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L 140114 NH Village Consultation Rep



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

Naomi Hubbard  
E: nhubbard@savills.com  
DL: +44 (0) 1865 269 176  
F: +44 (0) 1865 269 001

Wytham Court  
11 West Way  
Oxford OX2 0QL  
DX 96205 - Oxford West  
T: +44 (0) 1865 269 000  
savills.com

Dear Sir/Madam

### **Village Housing Options and Settlement Boundaries Consultation Representations on behalf of Gleeson Developments Ltd and The Sundial Group Ltd**

Savills is instructed by Gleeson Developments Ltd (Gleeson) and the Sundial Group Ltd (Sundial) to submit the following response to the Council's current consultation period concerning the Village Housing Options and Settlement Boundaries Document.

Gleeson and Sundial control the land at Southcrest Farm (K17) and Woodside Training Centre (AS 1b), to the east of Kenilworth. Representations have previously been submitted to the Council highlighting the lack of constraints on this land, its suitability for development and its deliverability.

These representations maintain our view that a wider, long term, approach to development at Kenilworth should be taken, including the land at Thickthorn and K17/AS1b. This will enable a comprehensive approach that will meet the aims and objectives of Garden Suburbs. It will provide better linkages into the town, provide improved services and maintain the existing playing fields/sporting facilities in the area.

As a minimum, the whole area of land should be taken out of the Green Belt and safeguarded in accordance with the advice in the National Planning Policy Framework.

### **Distribution of Housing to the Villages**

Gleeson and Sundial support the principle to 'concentrate growth within, and on the edge of, the existing urban areas' [our emphasis] as set out in RDS3 of the Revised Development Strategy and therefore question the Council's approach to allocating 1,000 houses to the rural villages.

The National Planning Policy Framework (NPPF) is clear in identifying the need to deliver sustainable development. For plan-making this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area; and
- Local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
  - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
  - Specific policies in the Framework indicate development should be restricted.

Sustainable development comprises three dimensions: economic, social and environmental roles. The Government identifies that the economic role should contribute to 'building a strong, responsive and



competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation'. The social role should support 'strong vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being'. The above two roles should be considered with the need to 'protect and enhance our natural, built and historic environment'; an environmental role.

The NPPF identifies the need to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'. This is supported by Paragraph 37 of the NPPF which identifies that a significant boost is required to the supply of housing. Paragraph 17, highlights that Council's need to manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are sustainable. Whilst we support growth within the rural settlements to maintain and bolster economic development we object to the level of growth proposed in the Village Housing Options and Settlement Housing Consultation document.

Housing should instead be directed towards the more sustainable urban areas within the district. It is evident that such areas can accommodate increased housing numbers. For example previous representations made by Savills indicate that the land at Southcrest Farm and Woodside is developable and deliverable and is on the edge of one of the most sustainable settlements in the District.

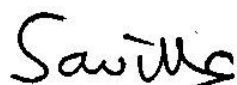
The current strategy is considered to be unsound in that it is not positively prepared, justified, effective or consistent with national policy. We recommend that the overall housing numbers to rural areas is significantly reduced.

### **Green Belt Boundary Review**

In order for the Council to deliver 1,000 dwellings through village development, a review of Green Belt boundaries will need to take place for 10 out of the 13 listed villages. When reviewing Green Belt boundaries the NPPF requires local authorities to take account of the need to promote sustainable patterns of development. This should include considering the consequences for sustainable development of channelling development towards more sustainable urban areas where a long term review of Green Belt boundaries can take place. In contrast to the more piecemeal approach set out in the Village Housing Options and Settlement Housing Consultation document.

We would be grateful to be kept informed of progress in respect of the Council's Local Development Framework. Should you have any questions please contact Naomi Hubbard at the above address.

Yours faithfully

A handwritten signature in black ink, appearing to read "Savills", written in a cursive style.

**Savills**