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Lt Village Housing Options Consultation Response 170114

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Dear Sir / Madam

### **Village Housing Options and Settlement Boundaries Consultation**

The following comments on the Warwick District Local Plan Village Housing Options and Settlement Boundaries Consultation Document are made on behalf of the Bateman Settled Trust and Mr A Rajkowski in relation to land east of Station Lane, Kingswood.

As well as the comments set out below, please find attached a short A 3 document which illustrates the potential for a small scale village housing development on land to the east of Station Lane at Kingswood. This scheme has been designed to address the previous concerns regarding site 8 in Kingswood (identified in the consultation document as land to the south of Kingswood Close), which is identified as a Discounted Option in the consultation document. Since our original representations on this land, the proposed development now incorporates additional land at Kingswood Farm, which allows satisfactory access to be accommodated without affecting any of the oak trees on the Station Lane frontage (one of the reasons for discounting this site), and in a form that is satisfactory in access terms (another reason given for previous non acceptance).

Two example schemes are shown, one for a small number of houses on the site frontage to Station Lane, with a new footway introduced to run along behind the oak trees, connecting with and extending the existing footway to the north. The proposed footway would be set back behind the mature trees along Station Lane, and would increase road safety for pedestrians using this section of Station Lane which lacks a footway at present. The development would be accessed by a low impact, sensitively designed new access lane behind the new properties, so that the frontage and the mature oak trees would be retained in their present form. The existing character of Station Lane would be retained and protected.

This approach will retain the tree lined, treed avenue character of this part of the lane and the proposed building line respects the established pattern of development in the area. The scale, location and design of the proposed houses would reflect the local village housing character. Examples of house sizes and styles that have been approved and constructed recently in a similar village context elsewhere are included in the A3 document. This shows that new village housing can be handled in a manner which ensures that the village character is retained and amenities are not harmed in any way. The character and setting of the listed farmhouse at Kingswood Farm would also not be harmed. A significant area of open land is retained between the proposed small development area and the canal corridor and the pattern of small scale paddocks would be preserved, ensuring that development is entirely compatible with the landscape character of the area.

The present field pattern and landscape character of meadows to the rear could be retained and protected by a management agreement as part of any allocation and planning permissions (addressing the landscape character reason why this site was omitted, and ensuring that the landscape character is protected).

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A second option shows how a slightly larger development could be achieved, by creating an enclave of village housing behind the frontage dwellings. This could provide a slightly larger number of village houses, developed in similar character, with one group of houses fronting Station Lane and the other fronting the fields beyond, served by the same type of informal access lane. The third plan in the document shows how an area of land behind the housing enclave could be utilised (if the village required it) as open space, parkland, or as a bowling green, playing field or other similar local amenity space for the village. This would be delivered by the housing scheme for the wider benefit of the entire village, meeting some of the community needs recently identified in the village survey, in which facilities and open space were identified as being required. We have also indicated the line of a possible walking route for village residents alongside the canal, through land owned by our clients, which might form the basis of a future comprehensive route along this side of the canal, running the length of the village.

We appreciate the concern to have local housing for local people, rather than sites being allocated and simply accommodating people, from a wide area. In response we were happy to consider and hold dialogue about how a proportion of the new dwellings might be reserved for local people, restricted to those currently living within Kingswood / Lapworth, the Parish or a defined area. This has been achieved elsewhere.

The illustrative layout and examples of village housing, including new houses close to existing mature oak trees, collectively show that a form of development can be achieved on this site which overcomes all of the reasons why the site was omitted. This work also shows that the authority can be confident that if allocated with appropriate policy wording, a satisfactory and suitably sensitive form of development can be delivered. Properly allocated and carefully controlled, a relatively small development can deliver useful facilities (new footway on Station lane, landscape management, opportunities for a village green space accessible for all, future linear footpath routing alongside the canal) whilst importantly delivering local housing for local people.

The site represents a sustainable, well located and deliverable opportunity for a sensitive and discrete development entirely in keeping with its surroundings that would help to meet identified housing needs. Following our original representations, and these further submissions, we will be continuing our promotion of this site through to the Local plan examination, but we trust that on the basis of this additional information now submitted a revised site allocation can be included in the emerging plan.

We would welcome the opportunity to discuss the proposals with the Council in more detail following these submissions.

## **Chapter 2: Contextual and Policy Overview**

The identification of Kingswood as a Primary Service village to accommodate 100-150 dwellings over the plan period in the Revised Development Strategy is fully supported. Kingswood represents a sustainable location for new housing development to meet identified needs. Kingswood is the main settlement in the parish of Lapworth, which has a population of approximately 2,000 people. The village has a range of facilities including pre-school and primary school, GP surgery, village hall, shops, pubs and restaurants. The settlement benefits from a railway station on the Chiltern Line from London to Birmingham, offering regular services to Birmingham, Solihull, Warwick and Leamington Spa.

It is considered that there is potential to accommodate growth at the upper end of this range set out in the Revised Development Strategy at Kingswood in a sustainable manner. It is acknowledged that there are important environmental considerations to be taken into account, however the evidence presented in the Village Housing Options and Settlement Boundaries Consultation and supporting documentation does not justify any reduction in housing provision for Kingswood.

The document submitted alongside this consultation response illustrates how additional growth could be accommodated at Kingswood on land to the east of Station Lane. These proposals fully address the constraints identified in the supporting evidence base studies.

It is also noted that work on a Joint Strategic Housing Market Assessment is (SHMA) is being undertaken and this may result in a revised figure for housing provision across the District. This will need to take account of unmet development needs arising from adjoining local authorities. This is likely to increase pressure on the District to accommodate new development and it is essential that all of the opportunities for the larger villages to accommodate sustainable development are fully and thoroughly explored.

### **Chapter 3 Green Belt and Exceptional Circumstances**

There is a clear justification for new Green Belt boundaries to be drawn up around the larger villages to allow for future development. As well as accommodating the level of new development as proposed in the plan, the revised Green Belt boundaries should be drawn to allow for the longer-term development needs of the Primary Service Villages, as proposed in the Kingswood situation, with the addition of the areas shown in these representations.

Paragraph 85 of the NPPF states that when defining Green Belt boundaries, local planning authorities should identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. This should ensure that Green Belt boundaries will not need to be altered at the end of the development plan period. The proposed Green Belt boundaries set out in the Village Housing Options and Settlement Boundaries Consultation document are drawn tightly, consideration should be given to the longer term growth needs of the villages including consideration of safeguarded land. If not allocated this time for housing, the land east of Station Lane should be shown as safeguarded land for future development needs to be met without having to review the Green Belt again.

### **Chapter 5 Site Selection Process and Methodology**

It is noted that the site selection process and methodology is based on a 'long list' of sites pulling together information from Warwick District Council's SHLAA. The site assessment for Kingswood site 8 (land to the south of Kingswood Close) has been undertaken on the basis of SHLAA site R110, but does not take account of the availability of adjoining land at Kingswood Farm that would allow access to be provided without harm to the tree frontage. Our representations submitted in response to the Revised Development Strategy in July 2013 included land at Kingswood Farm as part of a wider proposal with a range of potential access options, and these have not been fully considered.

### **Chapter 7 Village Plans and Housing Options, sub-section 10: Kingswood (pages 53 and 53) including the Indicative Settlement Boundary for Kingswood and Discounted Site Option 8**

We object to the identification of Kingswood site 8 (land to the south of Kingswood Close) as a discounted option. The evidence base has been carefully reviewed and there are very clear opportunities to accommodate development in this location without harm to the environmental constraints in the wider area or the purposes of the Green Belt.

The evidence base on which site 8 has been discounted has failed to take into account the availability of land adjoining Kingswood Farmhouse, which provides an opportunity to access the site without any impact on the tree frontage along Kingswood Lane, a key reason for discounting this option in the Council's assessment. The accompanying A3 document demonstrates indicative layout options for small scale development which addresses the reasons for discounting the site as follows:

- Landscape – the proposed layout provides a substantial buffer between the site and the canal corridor. The small scale field pattern and significant areas of permanent pasture are retained and can be managed.

- Ecology – the habitat along the canal corridor is not impacted by the proposed development and opportunities for biodiversity and landscape would be provided.
- Highways – access to the site can be provided via Kingswood Farm with out the need to remove any mature trees, and the retention of the trees will add to the treed avenue effect which already prevails, as shown in attached photographs. .
- Heritage – the setting of the listed Kingswood Farmhouse is provided by the open land to the east of the farmhouse. The farmhouse would be well screened from the proposed development by established vegetation and the small scale field pattern that provides the setting the listed Kingswood Farmhouse would be preserved and managed. The scale, location and design of the proposed houses would ensure that the setting of the listed farmhouse would not be harmed.
- Green Belt - development of the scale proposed will not compromise the role and function of the Green Belt
- Pattern of development - the proposed options both show how the building line respects the established pattern of development in the area. The design and layout would ensure that development is entirely in keeping with its surroundings.

In summary, the site represents a sustainable, well located and deliverable opportunity for a high quality village housing development entirely in keeping with its surroundings that would help to meet identified housing needs.

The site should therefore be removed from the Green Belt and allocated for development to meet the housing needs of the area. We would welcome the opportunity to meet with the Council officers and / or with the Parish Council to discuss the proposals further.

We trust that these comments and the attached document will assist the Council in the progress of the Local Plan with this land properly included for meeting local housing needs, subject to appropriate stringent policy wording.

Yours sincerely

**Tim Hoskinson**  
Associate