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BY EMAIL: planningpolicy@warwickdc.gov.uk

11th March 2019

29543/A3/KV/sw

Dear Mr. Clarke,

WARWICK CUSTOM AND SELF-BUILD SPD CONSULTATION

Introduction

We write on behalf of our Client, Barwood Land (hereafter, 'Barwood'), and welcome the opportunity to respond to Warwick District Council's Custom and Self-Build Supplementary Planning Document (SPD) Consultation.

Barwood is currently working with the Council in respect of the delivery of the land at Kenilworth (Part of Site H06 as identified in the Adopted Local Plan). They also have interests elsewhere in the District.

Consultation Response

Section 1: Purpose and Context

Annex 2: Glossary of the National Planning Policy Framework (NPPF) (Framework) (published February 2019) defines Supplementary Planning Documents as:

"Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan." (our emphasis)



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Paragraph 33 of the NPPF outlines that:

"the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. (our emphasis)"

In this case, the SPD is founded on Policy H15 of the Adopted Local Plan which encourages the provision of custom and self-build housing on, amongst others, major strategic housing sites. In the case of Kenilworth, further detail is provided in the Kenilworth Neighbourhood Plan which was 'made' on the 16th November 2018 and advises that self-build should not exceed 5% of the total number of dwellings on these sites. In the case of Barwood Land's site (which forms part of site H06), this would equate to maximum of 38 dwellings across the whole of H06.

The Council's Custom and Self Build Progress Report 2018 shows that in the latest base period 31st October 2017 – 31st October 2018, 95 people registered for plots for self-build however only 6% (6 people) of these expressed an interest in Kenilworth as a preferred location. Turning then to the types of development in which people expressed an interest, 72% (of the 95 people) want a self-build one off home – only 1% (1 person) expressed an interest in a developer led project. This shows therefore that there is currently negligible demand for self-build / custom build on a developer led scheme in Kenilworth. This is not unsurprising given the inherent tension between the desire for a self-build property (and the desire for a bespoke dwelling of their own creation) and the supply of this on a developer led scheme where, by its very nature, schemes whilst on individual plots, are however surrounded by new 'non-custom build' development and therefore in such circumstances, the appeal of custom build is likely to be limited.

The Council's provisions within the SPD for the provision of custom build on larger sites are in general based on practical principles i.e. the clustering units rather than individual units dotted around the development. There is however a need for a link between the type of dwellings required and the type of dwellings provided. Whilst the preference for a mix which accords with the SHMA is understood, clearly the provision of plots for a 2 bed custom build plot is not practical if the demand as evidenced from the Council's register, is for 4 bed plots.

Whilst we appreciate the flexibility the Council are seeking to provide in allowing a self-build plot to revert to a market plot, if a plot has not sold after 12 months, we consider this length of time is too long when the Council's register should already contain details of those who would be interested. This is particularly the case towards the end of a build (bearing in mind the larger sites are likely to be sub-divided between a number of developers). If the plot(s) becomes available again after the developer has moved on from the site, that developer will not return to the site and re-mobilise a workforce for such a small number of dwellings. We consider this period should be reduced to ensure that parts of a site are not left undeveloped.

In reality, whilst the provision of self-build / custom build is supported, their attractiveness and deliverability are much reduced on large scale strategic sites. These matters therefore need to be considered on a site by site basis particularly when the current register shows that there is very no demand for such plots on developer led schemes (which will therefore be relevant for all large scale strategic sites).

We trust this submission is clear and helpful however should there be any queries in relation to the above, or consider a meeting would be helpful, please do not hesitate to contact me.

Yours sincerely



KATHRYN VENTHAM
Partner

cc: Sam Dorrian - Barwood Land

