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Dear Sirs

Bishop's Itchington Neighbourhood Plan Consultation Response by David Wilson Homes

We are instructed by David Wilson Homes ("**DWH**") to submit representations to the Bishop's Itchington Neighbourhood Development Plan Pre-Submission draft ("**BINDP**"). We welcome the opportunity to comment at this time. DWH are promoting land to the east of Bishop's Itchington, on land to the north of Hambridge Road and to the east of properties on Old Road, as a residential led allocation.

We submitted comments previously to the Regulation 14 Pre-Submission Consultation in March 2021 and wish to make further comments on the Submission Version of the Plan. Our comments should be read in the context that land north of Hambridge Road is already identified as a proposed housing allocation in the emerging Stratford-upon-Avon Site Allocations Plan (BISH.02) with the potential capacity for 24 dwellings. The representations submitted previously advised that as a minimum, the Neighbourhood Plan should be consistent with the emerging Site Allocations Plan. However, the most appropriate approach is for the Neighbourhood Plan to allocate the full extent of the land (identified at Appendix 1), within the loop of the River Itchen as an allocation for residential development with public open space. We set out our detailed comments below.

Neighbourhood Plan Vision

The Vision for the BINDP set out at the top of page 12 of the Plan makes reference to Bishop's Itchington retaining and developing a strong sense of community and enabling families to stay close together through all stages of life. We fully support this aim, however, it is questionable how it will be achieved through the delivery of a Neighbourhood Plan that seeks to restrict new development to windfall sites within the village boundary only and makes no housing

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allocations of any type. This approach will render it harder for family members to remain within the village throughout the course of their lives as very little new housing will be provided. There is a clear need to plan for the development of new homes in and around the village in order to accommodate the future needs of residents who wish to live independently and also close to relatives to maintain family ties.

Strategic Objectives

The BINDP identifies a number of strategic objectives which we comment on accordingly;

SO1 – This Strategic Objective follows on from the Vision in that there is a desire to allow families to remain the village. Clearly, we have no objection to this but query how this is to be achieved if the Plan contains a range of restrictive policies to prevent new development coming forward.

SO2 – We do not object to this particular objective and consider that new development can be planned accordingly having regard to the existing role, environment and character of the village. New development could be designed to be consistent with this objective.

SO3 – Again we do not object to the principle of this objective but question how you are going to be able to attract businesses and employment into the village if there are not sufficient places for people to live. If it is expected that people are to work within the parish then sufficient and suitable housing should be provided to accommodate the workforce.

Paragraph 3.5

Paragraph 3.5 of the Neighbourhood Plan advises that the emerging plan is being prepared to be in accordance with the Stratford-upon-Avon Core Strategy, and the District's Emerging Site Allocations Plan. The Site Allocations Plan is being prepared to be in conformity with the Core Strategy, which is essential given that it is a Part 2 Plan. Policy CS15 – Housing development of the Core Strategy, requires the provision of 'at least' 14,600 dwellings during the course of the Plan Period. In addition, it requires the preparation of a Site Allocations Plan that identifies Reserved Housing Sites that can provide the equivalent of 20% of the total housing requirement at 2031. The Preferred Options versions of the Site Allocations Plan, which was the subject of public consultation between October and December 2020, identifies two Reserved Housing Sites at Bishop's Itchington to meet this requirement.

We disagree that the BINDP has been prepared to take account of the reasoning and evidence informing the emerging Site Allocations Plan for the following reasons. The Core Strategy states that Reserved Housing Sites will need to be identified. The Council's Strategic Housing Policy, therefore, says 20% of new homes will be identified in the Part 2 Plan. The emerging Site Allocations Plan included two draft allocations in Bishop's Itchington. In light of the draft allocation how can the BINDP be prepared in accordance with the Core Strategy and Site Allocation Plan if it does not reflect these allocations? The statement in paragraph 3.5 is

therefore incorrect. No sound rationale is provided for this within the Neighbourhood Plan. There are, therefore, two possible outcomes. Firstly, the Neighbourhood Plan risks being found unsound at the examination stage as it does not meet the requirements of the Development Plan. The second is that the Neighbourhood Plan is found sound but is rendered out of date as soon as the Site Allocations Plan is adopted making a Reserved Housing Site Allocation at Bishop's Itchington. The Neighbourhood Plan will, therefore, be a short term plan with a timescale likely to run into a matter of months before it is out of date. This is not a sound approach.

Paragraph 7.8

Further to the comments set out above in relation to paragraph 3.5, paragraph 7.8 of the BINDP states that it will have regard to the emerging South Warwickshire Local Plan ("**SWLP**"). The BINDP does not do this. The two Councils of Stratford-upon-Avon and Warwick District consulted on Scoping of Issues and Options on the South Warwickshire Plan which concluded in June 2021. The Scoping consultation included a housing requirement of 35,000 dwellings over the period up to 2050. This figure is the minimum housing need figure that will be needed for the Plan Period. Whilst the SWLP is still in the early stages of preparation, the standard method used for calculating housing numbers provides a very clear indication of what the housing requirement is going to be. It will not be lower and in all likelihood a higher figure will need to be adopted. The BINDP has no regard to this in the way that the Plan strategy or policies within it have been prepared. As such, the BINDP risks becoming out of date at the point of adoption or very shortly afterwards.

Furthermore, the Stratford-upon-Avon Core Strategy is now more than 5 years old and as such the standard method housing figure is the basis upon which 5 year housing land supply calculations should be carried out. Whilst we are not advancing a 5 year land supply point in respect of the Neighbourhood Plan, the standard method does indicate what the minimum housing requirement is and that it should be the starting point for considering how much housing is needed and should be planned for. Ignoring this key piece of evidence in the BINDP is likely to make the BINDP unsound and will result in it being out of date at the time of adoption or shortly afterwards, or incapable of adoption.

Policy BINDP1

The policy advises that outside the built up area boundary (**BUAB**) development will be restricted to those forms of development supported elsewhere in the Plan, included Core Strategy Policy AS.10 – Countryside and Villages. There is consequently a presumption against residential development outside of the settlement boundary.

This part of the policy fails to recognise that Core Strategy Policy CS.16, confirms that the housing requirement in the Core Strategy is a minimum. In addition, it is necessary for a Site Allocations Plan to be prepared that identifies Reserved Housing Sites with the capacity to deliver 20% of the overall housing requirement. The District Council commenced work on a

Site Allocations Plan that has now progressed through the Preferred Options Consultation and the Pre-submission stage is awaited. The Site Allocations Plan has identified land to the east of Bishop's Itchington as a Reserved Housing Site. Policy BINDP1 fails to recognise the requirements of Policy CS.16 of the emerging Development Plan, and therefore BINDP1 has the potential to be out of date immediately.

The Core Strategy confirms that additional site allocations are needed. The Site Allocations Plan identifies two draft allocations outside of the BUAB, specifically to meet the future housing needs of the District. The strategy set out by the Core Strategy and Site Allocations Plan both indicate that additional land and sites outside of the BUAB will be required. The BINDP is not, therefore, in accordance with the spatial strategy set out by the higher order Development Plan.

In addition, the land to the north of Hambridge Road offers the Parish Council the opportunity to take control of where housing will be allocated within the developing SWLP. The full extent of the land within the loop of the River Itchen extends to approximately 33 hectares and has the potential to deliver 250 dwellings and is within a location already identified by the District Council as suitable for housing. In light of the identified significant need for new housing for the period to 2050 and Bishop's Itchington's position in the settlement hierarchy, Bishop's Itchington will be required to make an appropriate contribution to the South Warwickshire housing need. The BINDP is the place to recognise this and set out policies and allocations to facilitate the delivery of housing in the parish and the land within the loop of the River Itchen would be a sensible allocation as it is extremely well contained and would not set any precedents in other locations around the settlement.

Clearly, if the Neighbourhood Plan continues with not making any allocations, it risks being out of date upon adoption. Including only the draft allocations identified in the Site Allocations Plan would help to ameliorate this, but only to a degree. However, the BINDP should be amended to allow sustainable development, not just within the settlement boundary, but also on identified land adjacent to and outside to the urban edge. This is the approach recommended by the Inspector examining the Burbage Neighbourhood Plan (in Hinckley and Bosworth District) which was subsequently adopted.

Policy BINDP2 – Local Housing Needs

The policy creates an illogical position whereby the policy supports the provision of affordable housing to meet local need, but does not support the development of market housing to meet local need. This means that when a household cannot afford their own property this policy can be used to support the development of housing, but, if a household is able to afford their own house they are discriminated against as the policy prevents the delivery of market housing. Paragraph 7.23 of the Plan identifies the various criteria to be used in establishing if someone has a 'local connection' for the purpose of this policy. These criteria apply equally to both households who can afford their own property and those who cannot, therefore, the criteria are inconsistent with Policy BINDP2.

There is no reasonable justification for this position. It is accepted that there is an affordable housing need within Bishop's Itchington, but there is also a market housing need. The policy should be re-drafted to reflect the need for both forms of housing in Bishop's Itchington.

Policy BINDP4 – Design

As worded, the policy requires that development should seek to minimise resource use, exceed minimum standards for energy efficiency and seek to be carbon neutral in order to reduce the effects of climate change. Whilst we do not object in principle to the aims of the policy, it is poorly defined. Greater clarity should be provided in respect to meeting building regulations. As such, this part of the policy should be deleted, or re-worded to refer to the achievement of building regulations within new developments.

The policy lists a very large number of criteria that will be used to assess development proposals. These cover a wide range of issues and matters many of which are covered by existing and proposed legislation and national policy against which Development is more appropriately tested. Therefore, the list of criteria should be deleted or referenced to relevant legislation and national policy.

Policy BINDP12 – Electric Vehicle (EV) Charging Infrastructure for New Homes

In principle yes, we agree that the Local Plan should seek to improve EV charging infrastructure. However, we disagree that the Plan should make it a requirement for every new house to provide an electric charging point. The use of electric vehicles is still in its infancy and as such, there is no overriding technology or more specifically charging connection that is standard across all manufactures yet. As such, DWH feel there is very little point installing connection type A when the occupier could have a vehicle that uses connection type B. Therefore, rather than attempting to pre-judge which connection point to install, the Local Plan could require the installation of the relevant wiring and circuitry so that the occupier can then install whichever connection point fits their car. Likewise, wiring for a communal charging point or points can be made and the final connection point installed when it known who is to maintain the charger.

Omission Site – Land to the north of Hambridge Road

The omission of land to the north of Hambridge Road from the BINDP is a serious weakness in the Plan. As stated above, part of the land north of Hambridge Road is currently identified as a draft Reserve Housing Site allocation in the Site Allocations Plan. As stated above the draft allocation should be included within the BINDP and there is considerable planning merit in including all the land within the loop of the River Itchen within a housing allocation in the BINDP. Allocating the site in the BINDP will ensure that the Neighbourhood Plan is not only in conformity with the Core Strategy and Site Allocations Plan but also that it has regard to the emerging SWLP. Furthermore, confirming an allocation for all the land within the loop of the

River Itchen will ensure the Neighbourhood Plan does not become out of date as other Plans progress towards adoption. An up to date BINDP will help ensure the proper planning of the Parish going forward and protect it from speculative applications.

In addition, allocating all the area within the loop of the River Itchen will present opportunities for substantial areas of new public open space adjacent to the river. The creation of this new public open space will be of particular public benefit to residents of Bishop's Itchington through increased public accessibility to the river. Furthermore, the river is a very strong boundary that will prevent further development eastwards.

We trust you will take our representations into consideration, should you do have any questions or points requiring further clarification please do not hesitate to contact us; we would be very pleased to discuss these matters with you.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J Pearce', with a long horizontal flourish extending to the right.

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Cc M Marais – DWH