EXAMINATION IN PUBLIC HEARING STATEMENT

In respect of
MATTER E: SPATIAL DELIVERY OF HOUSING

On behalf of
BARRATT AND DAVID WILSON HOMES (MERCIA)

Ref: RCA043f
Date: December 2014
1.0 **MATTER E: SPATIAL DELIVERY OF HOUSING: ‘THE BIG PICTURE’**

1.1 This Hearing Statement has been prepared on behalf of Barratt and David Wilson Homes (Mercia) in connection with the spatial delivery of housing in relation to the Stratford-on-Avon District Core Strategy (2011 – 2031).

1.2 The Statement provides answers to the Inspectors questions as outlined in his guidance for the matters, issues and questions for discussion.

*Question 1a – Is the Plan’s vision and policies for the distribution of housing development around the District sustainable when considered against the reasonable alternatives?*

1.3 It is not considered that the current approach for the distribution of housing development is sustainable in the longer term when considered against the alternatives. The District Council consider that they have adopted a Dispersal Strategy (but we consider this is rather limited in comparison to neighbouring authorities such as Wychavon).

1.4 The proposed allocation of a new settlement to Gaydon/Lighthorne Heath is not, as yet sufficiently justified in our view. We have previously commented in representations that Gaydon/Lighthorne Heath are currently categorised as Category 3 and 4 Local Service Village settlements and as such are not sustainable locations for this quantum of development. The over-reliance upon JLR as the main source of employment would also expose this settlement to structural economic change on a huge scale if JLR were to move operations elsewhere. However, as an allocation of 2,500 dwellings, we do not consider it sufficient to support a sufficient level of services and facilities to protect it longer term.

1.5 We therefore, do not agree with the current distribution of housing development and consider that a ‘true’ dispersal strategy should be adopted for the Plan which would represent more appropriate sustainable development across the District as a whole. Should there be a large-scale increase in housing numbers
for the District during this Examination, then we would expect a significant proportion of housing to still be considered for settlements constrained by green belt, such as Studley and Wootton Wawen before a large settlement to serve JLR is taken seriously.

**Question 1b – Is the hierarchy of existing settlements in Policy CS15 justified?**

1.6 We consider that the hierarchy of settlements is both justified and appropriate in taking the Plan forward.

**Question 1c – Is the balanced dispersal of dwellings between the existing settlements, in which approximately 25% of dwellings would be built in Stratford-upon-Avon, 27% in Main Rural Centres and 18% in Local Service Villages, appropriate?**

1.7 We consider that the overall dispersal of dwellings between the hierarchy to be appropriate in principle. Based on the fact that in general, higher order services and facilities (including employment opportunities) tend to be located within the larger settlements. However, there also needs to be some acknowledgement that other settlements that fall within lower categories (for example, Moreton Morrell is Category 4 and Tredington is a Category 3) do have good access to neighbouring settlements with significant facilities such as high schools, hospitals and so on. A true dispersal strategy would change the ratio of dwellings outside of Stratford town in favour of the rural settlements. Further comments are made in relation to the allocated numbers for each settlement in the appropriate Hearing Statement covering those matters (Matter I).

**Question 1d – Is there any consensus that this 70% should be allocated to the existing settlements, even if the exact proportions between settlement types is not necessarily agreed?**

1.8 To a degree the answer to this question will become clearer when the housing target is substantially increased. Clearly 70% of 15,000 dwellings is significantly better than 70% of 10,800.
Question 1e – Of the remainder, does the Plan strike the right balance in seeking to develop a new settlement adjacent to the existing employment site at Gaydon, whilst rejecting a more dispersed pattern, options for sustainable urban extensions and not fully utilising the opportunities that exist in the District to re-use previously developed rural sites?

1.9 No – we consider that there should be a more dispersed pattern of development, fully utilising brownfield opportunities and reviewing opportunities to release sustainable sites from the green belt before an entirely new settlement can come forward. Particularly as the new settlement proposed we consider is too small to be truly sustainable.

1.10 It is considered, and demonstrated in our previous representations, that the allocation of a new settlement in an unsustainable location (when taken on its own) that the District Council have not given sufficient consideration to the possibilities for proportionate growth to those Main Rural Centres and Local Service Villages which can accommodate such growth, subject to satisfying landscape concerns and in some cases green belt issues (e.g. Studley).

Question 2a – Does the Plan provide sufficient detail over what will be permitted where?

1.11 No comment.

Question 2b – Is there evidence to show that the amount of development proposed in the strategic allocations, including in each of the 4 categories of Local Service Villages, is justified?

1.12 No. In particular, allocations of between 10-25 homes in Category 4 villages run the risk of being undeliverable – most volume housebuilders will seek a minimum development level of 30 homes and there are very few smaller developers seeking sites of that scale.
1.13 10-25 homes will also not bring sufficient community infrastructure with them to assist with the infrastructure needs of these villages longer term.

Question 2c – Noting the modification proposed as new paragraph 5.2.7, does this require a further modification to parts 1 and 2 of Policy CS15 to refer to the Site Allocations Plan and to part C of Policy CS16 to refer to Stratford-upon-Avon and the Main Rural Centres?

1.14 Yes it is agreed that there should be further modifications to parts 1 and 2 of Policy CS15 and part C of Policy CS16 to reflect those modifications identified as the new paragraph 5.2.7 to ensure that there is consistency throughout the Plan and that such provisions are included within the formal policy wording for future potential.

Question 2d – In the absence of a review of the Plan, how could a change in the status of a Local Service Village, as suggested in part 4 of Policy CS15, be realised?

1.15 The status of each settlement within the plan area should kept constantly kept under review, with the cooperation of the Parish and Town Councils. As services and facilities change/grow/disappear, this could have implications for the distribution of development. With a review in 2021, additional capacity could then be identified (for instance) more easily.

1.16 We would contend that to only review certain Local Service Villages would render the process unsound and that a comprehensive review should be taken of all Local Service Villages to determine the level of services and facilities available for residents and to ensure transparency and fairness when undertaking such a review.

Question 2e – How will the Plan quantify the amount of Local Needs housing that might come forward? Alternatively, given the proposed change to Policy CS16 that refers to at least 10,800 additional homes, is there a need to put a figure on this source of homes?
1.17 We consider it would be difficult to quantify an “amount” of Local Needs housing to come forward in the Plan given that these are very specific schemes provided through community funding for those people in local need of housing to those individual settlements.

1.18 Boosting the windfall assumptions may allow some scope for this to be addressed within the plan.

**Question 3a – Insofar as the Plan seeks to identify Built-up Area Boundaries is it justified and effective?**

1.19 We consider that the Built-up Area Boundaries to be justified and effective in accordance with the provisions of the National Planning Policy Framework. Given that there are extant permissions from the adopted Local Plan that fall outside of the existing Built-up Area Boundaries, then it is considered that a comprehensive review of the boundaries is justified. Indeed, this may also be pertinent if the District Council decide to undertake a green belt review to release new sites for housing.

**Question 3b – Is it agreed that any Built-up Area Boundaries should include all allocated sites and extant permissions?**

1.20 We consider this to be appropriate given that allocated sites are on the whole situated on immediately adjacent to the settlement boundaries and that extant permissions should be included within the boundaries of settlements.

**Question 4 – Does Policy CS15 need to be revised to make clear that the Plan is not proposing a brownfield first approach?**

1.21 No comment.

**Question 5 – Is it appropriate for part D of Policy CS16 to monitor for over-provision of housing?**
1.22 We consider it important to allow for continual and annual monitoring on the delivery of residential development and that such gathering of information should be made publically available as a minimum annually.

1.23 We do not consider such monitoring should be used to justify another moratorium, which, at a time when the Framework is advocating the need to significantly boost housing supply in general.

**Question 6a – Why are contingency sites only proposed to be identified in Stratford-upon-Avon and the Main Rural Centres?**

1.24 No comment.

**Question 6b – Alternatively is part D of Policy CS16 simply not required on the basis that sustainable development would be brought forward in the event of any under-supply?**

1.25 We do not consider that this element of Policy CS16 is required, given that it provides further continued monitoring of the provision of supply across the District and as such any under-supply can be dealt with at an earlier rather than later stage to ensure that the continued provision of sustainable development across the District can be delivered throughout the Plan period.

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