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**Development Policy Manager**

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

29 July 2013

Dear Sir/Madam,

**Warwick District Council Local Plan – Revised Development Strategy**

We set out below our response to the Local Plan Revised Development Strategy currently the subject of consultation until Monday 29<sup>th</sup> July 2013.

**Local Plan Revised Development Strategy**

In general terms we extend our support for this document that proposes an interim level of growth of 12,300 homes between 2011 and 2029. We welcome the flexibility this allows to adjust the overall level of growth following completion of a Joint Strategic Housing Market Assessment with its neighbouring authorities.

We do however query the level of windfall provision (2800) that comprises some 23% of the total housing requirement. Added to this, sites in the form of 'Small Urban SHLAA Sites' (300) and 'Consolidation of Existing Employment Areas' (450), means that almost 29% of the housing requirement proposed is unidentified. The National Planning Policy Framework (NPPF) advises Local Planning authorities that they may make allowance for windfall sites in the five- year supply if they have compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. This has not been the case in Warwick District, that currently has only a 2.6 year supply of housing land.

Support is extended to the allocation of land at Woodside Farm for 280 houses and open space to be provided in phase one of the Local Plan period. In view of the lack of a five-year housing land supply, an outline planning application has now been submitted by Thomas Bates and Son Ltd for this site, in accordance with the NPPF and emerging local policy. Officers of the Council have verbally confirmed that support will be given to such applications in terms of a committee recommendation for approval, in advance of the adoption of the Plan, where the proposals meet other emerging policies of the plan.



We refer to advice recently given to Maldon District Council in Essex, by Nick Bowles - Planning Minister, and the Assistant Director for Development Plans and Major Casework at the Planning Inspectorate – Keith Holland (KH). This is comparable and relevant to the Local Plan position in Warwick District. This advice confirmed the importance of meeting objectively assessed needs and the need to look at all reasonable options to fulfil this, for example by expanding growth on existing preferred sites etc. Maldon were advised to overcome identified constraints and warned that it would 'struggle' if it wanted to rely on highway constraints and/or landscape value to justify a lower housing target. Indeed the scale that PINS were putting on highway considerations was very modest and the government placed a higher priority on building houses than the impact of delay on the roads.

On the issue of five-year land supply and inviting planning applications KH stressed that without a five year land supply the local planning authority were very vulnerable in the case of a planning appeal. He suggested that the Council may want to look at the possibility of bringing forward a number of smaller and more deliverable sites in the short term to boost its five year supply.

In the context of the above we submit that the local plan should be amended to include a policy or supporting text that confirms that:

*Proposals for housing submitted in respect of the allocations as specified, and in accordance with the phasing indicated, will be approved where the proposed scheme is in accordance with the plan.*

It is submitted that policy on Housing Mix should be advised by the awaited SHMA. The affordable housing target of 40% is not in conformity with the NPPF and its call for flexibility. In the light of the emerging CIL and the impact of this on the viability of sites coming forward, the affordable housing provision should remain to be agreed with the Council on a site-by-site basis.

If you would like to discuss the contents of these representations or require further information on the issues referred to within please do not hesitate to contact Julie Cross at this office or via email [julie@am-plan.com](mailto:julie@am-plan.com)

Yours faithfully

**ANDREW MARTIN - PLANNING**