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29 July 2013

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

Dear Sir/Madam

Warwick District Council Local Plan 2011-2029
Revised Development Strategy Consultation

I am pleased to provide a response on behalf of our client, Bloor Homes, in relation to your consultation on the Revised Development Strategy June 2013 (RDS).

Level of Housing Growth 2011-2029

We are somewhat surprised that, give the work currently underway on a Joint Strategic Housing Market Assessment (SHMA), the Council has chosen to consult on what it refers to as an "interim level of growth" of new homes proposed between 2011 and 2029. It would seem premature to be proposing an interim housing figure in the context of work which we understand is underway and the early conclusions of which are now being discussed actively by the authorities involved in the exercise. Whilst it is instructive to read of the assumptions the Council is making with regard to future levels of housing growth in the District, including the relationship with economic modelling work, the key purpose behind the Joint SHMA is to ensure that all of the housing needs within the housing market area are met, and therefore this may imply the need for districts such as Warwick to meet unmet need arising in adjoining areas, particularly Coventry, should this prove to be necessary.

As such therefore at this time we offer no particular comment on the interim housing requirement figure of 12,300 homes over the period 2011-2029 until the work on the Joint SHMA is made public.

Broad Location of Development : Housing

We support the Council's proposals contained in draft Policy RDS3 in relation to criteria for the broad location of development. My client, Bloor Homes, is preparing a planning application in relation to an area of land north of Common Lane in Kenilworth, known as the "Crackley Triangle". This site accords with the

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criteria set out in draft Policy RDS3 in that it is on the edge of an existing urban area, is not in the Green Belt and is thus an alternative which is suitable and available, and is in a location which will not lead to the coalescence of settlements by virtue of the existing built form of Kenilworth surrounding the site on 2 of the 3 sides of the triangle.

Final changes to the scheme design are being made as a result of the recent public consultation exercise undertaken in Kenilworth on 25th June last. Indications as to the capacity of this site, which we have previously shared with officers from Warwick District Council, indicate that it will accommodate around 80 dwellings. This might be the reason why the site has not been identified thus far as an allocation on greenfield land on the edge of the existing settlement of Kenilworth. Given that our client is proposing to submit a planning application in the next few weeks on the basis of the lack of a 5 year supply of housing land in the District, as acknowledged by the Council, we are not at this stage raising a significant objection to the omission of the site from the housing allocations table at RDS5.

We also note that the RDS contains assumptions with regard to windfall sites coming forward in the plan period and assumes 2800 dwellings can be provided in this way. This is a challenging total but we assume that sites such as that at Common Lane, Kenilworth will provide a contribution to this ambitious target.

The configuration of the site off Common Lane, Kenilworth with its narrow point of access to the highway network, has perhaps previously suggested that development of the land might prove difficult. However, I am pleased to confirm that ongoing discussions with Warwickshire County Council have concluded that a safe and efficient means of accessing the site can be provided which meets all of the standards of the County Council, and has the ability to assist in traffic flows over Common Lane at a point where a restricted highway width at present makes driving conditions difficult in certain situations.

We will continue to liaise with planning officers at Warwick District Council as we prepare the planning application for submission in the next few weeks. I trust these comments in relation to the RDS are of some benefit, but should you wish to discuss anything further please do not hesitate to contact me.

Kind regards.

Yours faithfully



CHRIS MAY
Director

c.c. Duncan McKay, Bloor Homes