



**WARWICK LOCAL PLAN EXAMINATION**

**MATTER 3: SUPPLY & DELIVERY OF HOUSING LAND**

**REPRESENTATIONS ON BEHALF OF WARWICKSHIRE COUNTY COUNCIL**

**APRIL 2015**

**Introduction**

1. Savills has previously submitted representations to the emerging Warwick District Local Plan on behalf of Warwickshire County Council Physical Assets Business Unit (referred to hereafter as “WCC”), most recently with respect to the Publication Draft and Publication Draft Focused Consultation stages.
2. WCC owns an area of land to the south of Warwick / Leamington, bounded by Gallows Hill to the south and Europa Way to the east, within the Local Plan proposed ‘Land West of Europa Way’ allocation (ref H01) and for which outline planning permission was approved on 03 April 2015 for up to 425 dwellings<sup>1</sup>. This provides the context for the comments WCC wishes to submit with respect to Matter 3, which are set out below. WCC however wishes to stress that it is not seeking to delay the Local Plan Examination.

**Question 1 – What is the up to date situation regarding completions to date in the plan period and what is the residual amount of housing that needs to be delivered?**

3. No comment

**Question 2 – What is the potential total supply of new housing? What is the basis for this figure and how is it justified? How much would be developable within the plan period? How does total supply compare with the planned level of provision?**

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<sup>1</sup> Application reference W/14/0967 – Development of up to 425 dwellings (Use Class C3), medical centre, community hall, formal and informal open spaces, sports and recreation provision, structural landscaping, new roads, footpaths and cycleways, site access and ancillary works (outline application including details of access). Land North of Gallows Hill, Warwick, CV34 6SJ.

4. In terms of the supply of new housing, WCC wishes to highlight that the allocation quantum of 1,112<sup>2</sup> dwellings applied to the greenfield allocation H01 in the plan should be treated as a minimum. This allocation area comprises 3 separate land parcels, comprising approximately 38.5 ha owned by the Europa Way Consortium, for which outline planning permission has been granted for up to 735 dwellings<sup>3</sup>, approximately 23.1 ha owned by WCC, for which planning permission has been granted for up to 425 dwellings and approximately 1.5 ha owned by Gallagher Estates (with an estimated capacity of circa 45 dwellings). The estimated total capacity of these three parcels is therefore circa 1,305 dwellings.
5. Cumulatively therefore the area within allocation H01 has the potential to deliver in excess of the 1,112 dwelling capacity identified within the emerging Local Plan. It should be noted that 3ha of the land subject to WCC outline planning permission reference W/14/0967 has been safeguarded for stadium use for a period of 5 years. If this area of the WCC site is ultimately required for a stadium (which may reduce the capacity of the remainder of the site), it is still considered that the area within allocation H01 can deliver in excess of the identified 1,112 dwelling capacity. In addition, all of the housing within this allocation area is considered to be developable within the Plan period. WCC therefore requests that the developable capacity of allocation H01 is taken into account in considering the total supply of new housing for the Plan period.

**Question 3 – What is the estimated total supply in the plan period from: a) existing planning permissions; b) other commitments e.g. sites subject to S106; c) allocated sites; d) other sites specifically identified e.g. SHLAA; and e) windfalls?**

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<sup>2</sup> This figure excludes the 125 dwellings for land within H01 at Myton School, which is reported separately to the remainder of H01, in Policy DS11.

<sup>3</sup> Application reference W/14/1076 - Construction of up to 735 dwellings; a mixed-use neighbourhood centre to include retail development (Use Classes A1, A2, A3 & A4) and/or community and health uses (Use Class D1); safeguarding of land for education use; provision of formal and informal open spaces including sports and recreation provision, children's and youth play areas and allotments/orchards; strategic landscaping and drainage works including surface water attenuation ponds as part of a sustainable urban drainage system; provision of two vehicular accesses, one off Europa Way and one off Saumur Way; car parking; creation of new footpaths and cycleways and their connection to adjoining networks; ground remodelling; undergrounding of overhead powerlines including a new pylon to link to off-site overhead lines; formation of ponds as an ecological mitigation measure to accommodate the translocation of great crested newts. Land between Myton Road, and Europa Way, Warwick.

6. The total supply from planning permissions should take account of WCC planning permission reference W/14/0967. Please also refer to the answer to question 2 above for comments on the potential contribution from Local Plan proposed allocation H01.

**Question 4 – What are the assumptions about the scale and timing of supply and rates of delivery from these various sources? Are these realistic? Has there been any discounting of sites with planning permission for example?**

7. No comment.

**Question 5 – Specifically, is the figure for windfalls realistic and justified?**

8. No comment.

**Question 6 – What are the potential sources of windfalls? Given that the Local Plan and SHLAA have provided the opportunity to identify specific sites, are windfalls likely to come forward on the scale envisaged? What would be the implications if they didn't?**

9. No comment.

**Question 7 – How has flexibility been provided in terms of the supply of housing? Are there other potential sources of supply?**

10. WCC notes that the explanation for Policy DS7, at paragraph 2.21 of the submitted Local Plan, states that WDC considers that it has allocated sites for a potential of 6,892 homes, which is stated to be in excess of the amount WDC needs to allocate, to provide an element of flexibility. However this will need to be reconciled with the final agreed objectively assessed housing need (OAHN) for the District, as discussed at Matter 2. A fall in OAHN from that used to inform the submitted version of the Local Plan would translate into a further flexibility in the housing land supply position being provided for through the Local Plan.
11. Please also refer to the comments made with respect to question 2, in terms of the ability for proposed Local Plan allocation H01 to deliver more housing than its stated capacity.

### Question 8

12. No comment.

### Question 9 – Would the Local Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?

13. Paragraph 47 of the NPPF requires LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The Planning Practice Guidance (PPG) interprets this as requiring LPAs to have identified a five-year housing supply at all points during the plan period<sup>4</sup>.
14. The WDC housing land supply position, as submitted to support the Local Plan Examination, appears to be informed by a combination of submission documents HO06, HO07 and HO09-HO13. The most up-to-date submitted housing land supply position would therefore appear to be that set out in HOU12<sup>5</sup>, which states that WDC has a deliverable housing land supply during the period 2014-2019 of 2,360 dwellings, which increases to 2,970 dwellings when an allowance has been made for windfall housing. It is also clear that the May 2014 Housing Trajectory (HO06 and HO07) provides an indication of WDC's expectations for the delivery of the housing land supply identified at that time, including allocations, across the plan period.
15. Nevertheless, WCC contends that this submitted position falls short of actually providing a full assessment of whether WDC considers that it can demonstrate a five year deliverable supply of housing land against its OAHN position.
16. However WCC notes that in November 2014 WDC published an update report<sup>6</sup> contending that it could demonstrate 4.5 years supply. This report and the supporting list of sites has not been submitted by WDC to support the Examination. More recently, at the start of the WDC Planning Committee on 31 March 2015, WDC officers orally reported that it could demonstrate a 5.16 year supply of deliverable housing land.

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<sup>4</sup> PPG Paragraph: 030 Reference ID: 3-030-20140306

<sup>5</sup> Strategic Housing Land Availability Assessment – Main Report (May 2014), pages 11-12.

<sup>6</sup> 'An Update of the Five Year Housing Land Supply Situation from 1<sup>st</sup> April 2014 to 11<sup>th</sup> November 2014'

17. The WCC outline planning application for up to 425 dwellings was approved on 03 April 2015. In accordance with footnote 11 of the NPPF and reiterated in the PPG<sup>7</sup>, sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that the schemes will not be deliverable within the next five years. The granting of planning permission for the WCC site would therefore represent a further improvement on the deliverable housing land supply figures that WDC reported to its planning committee in March 2015. The WCC site is estimated to be able to contribute up to 200 dwellings within the first five year period, with the delivery of the remainder of the housing from the site contributing to the housing land supply for beyond five years.
18. WCC acknowledges that the housing land supply position is therefore constantly changing. However, WCC is not clear at this moment in time, from reviewing the published and submitted evidence base information, on how many years housing land supply WDC considers that it can demonstrate, although it is assumed that WDC's position will become public through WDC's submission with respect to Matter 3. Therefore WCC wishes to reserve the right to comment further on WDC's current housing land supply position when this information becomes available, if deemed appropriate to do so.
19. However WCC wishes to stress that the final housing land supply position needs to account for the deliverability of housing on the WCC site within the consideration of the five year housing land supply, which is important because the sustainable WCC site forms part of one of the Local Plan strategic housing allocations.

**Question 10 – In overall terms would the Local Plan realistically deliver the number of dwellings required over the plan period?**

20. No comment.

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<sup>7</sup> PPG Paragraph: 031 Reference ID: 3-031-20140306