

WARWICK DISTRICT LOCAL PLAN

EXAMINATION 2015

MATTER 3 – THE SUPPLY AND DELIVERY OF HOUSING LAND

RESPONSE TO EXAM 19 AND EXAM 20

ON BEHALF OF GALLAGHER ESTATES LTD

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**MATTER 3 – RESPONSE TO WARWICK DISTRICT LOCAL PLAN 2011-2029
EXAMINATION DOCUMENTS 19 AND 20**

1. Examination Document 19

- 1.1 Examination Document 19 provides notes on an Updated Trajectory: Matter 3 Statement Appendix 3.3 in response to three requests from the Inspector.
- 1.2 The first request of the Inspector was with regard to providing more information about the confidential SHLAA sites. Details of three sites have been released. This disclosure of information is helpful to improve the robustness of this land supply source, however, greater detail in respect of availability, suitability and deliverability and in particular site size, density etc. is not provided in the SHLAA for sites W39 and 42. In light of this, it is difficult to determine if delivery assumptions identified by the Council are appropriate.
- 1.3 The third request was for the allocated sites with and without permission to be differentiated within the trajectory. This information has been updated. Interestingly, despite refusing planning permission for Grove Farm (land south of Harbury Lane), completions are due to be delivered from 2017/18 onwards. It is unclear when permission is likely to be granted, however, should delivery falter it is possible that dwellings will be completed outside the plan period, which could jeopardise the delivery of the plan requirement. This example emphasises that the dwelling supply identified by the Council is insufficient and does not include sufficient flexibility. Additional sites should, in our view, be brought forward in order to ensure arising housing need is met.
- 1.4 When comparing the revised Appendix 3.3 with the previous version, there remains concern that there is double counting within the table 'All Sites - 5 Year Bands'. This is because commitments (sites <10) are included as well as a windfall allowance of 175 dwellings per annum. For example, in 2015/16 sites <10 totalled 103 dwellings, which has been incorporated in the trajectory alongside 175 windfall dwellings. As discussed within the hearing session there is concern that a duplication has occurred which potentially over estimates dwelling completions from small sites in years 2015/16, 2016/17 and 2017/18. Indeed the total supply has increased when compared to the earlier version, which is

perverse in light of the proposed changes to the Council's position set out in Exam 19 and 20 that ultimately reduces supply from windfalls and SHLAA sources. It is recommended that this approach is reviewed and updated in order to provide a true picture of housing delivery from small sites.

2. Examination Document 20

- 2.1 This document sets out a revised approach to Urban SHLAA Site and Windfall Allowance.
- 2.2 The Council has prepared a table setting out past trends of windfalls since 1996 (Table A) and identifies an average. A commentary is provided as to the changing circumstances yet continued windfall delivery over this period. There is no consideration, however, of different planning policies in place that have possibly influenced varying levels of windfalls, such as increased density requirements within PPG 3. It is our view that such policy initiatives will have resulted in an increased level of conversions and flatted development. As previously raised, there is a finite supply of available sites and demand for apartment opportunities and therefore conservative estimates should be adopted in future assumptions.
- 2.3 Another consideration not factored into the Council's assumptions is that due to the policy vacuum of previous years, demand is driving developers to seek out redevelopment opportunities for residential schemes, which is resulting in other uses relocating elsewhere to less accessible/ sustainable sites (i.e. relocating Council services, schools and commercial facilities to other locations). Once, however, planned sites adjoining the urban area are providing a reasonable amount of supply, demand for recycling land uses could decline.
- 2.4 The Council's revised assumptions to calculating future windfall development are welcomed. There is concern, however, that there remains possible duplication between SHLAA sites and Redevelopment & New Build (5+ Homes). Based on the revised assumptions and against a requirement of 12,960 over the plan period, there is a shortfall of 75 dwellings.

- 2.5 As identified in the hearing session, the Council admitted that based on the surplus figures in the Council's hearing statement the supply of housing land to meet 720 dwellings per annum was 'rather tight' and this takes no account of any arising unmet need. As expressed within previous representations, it is the view of Pegasus Group that in order to avoid under achieving the plan requirement, discounting for non delivery of plan allocations should be applied in order to provide a comfortable buffer. For example, this would allow for delays to delivery within the trajectory, which could very well happen due to circumstances out of the control of the Council as identified above.
- 2.6 It is recommended that as a result of applying discounting to selected sources, additional sites should be identified for delivery in the short to medium term as it is within this period that the problems are likely to arise. In terms of the types of sites that could be allocated, it is considered there are sufficient sustainable sites that can be identified consistent with the spatial strategy (e.g unconstrained land adjoining Warwick/ Leamington). It is considered that the options presented by the Council are very 'Black and White' and do not present a more practical combined approach of options that would be most suitable.
- 2.7 To conclude, it is our view that in light of the Council's land supply deficiency against a dwelling requirement figure of 720 dwellings per annum, they should be required to identify additional sites, which includes a surplus of land over and above the plan requirement to allow for flexibility and changing circumstances.