

The Inspector to the Warwick District Local Plan Examination
C/o Ian Kemp
Programme Officer
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Worcestershire
WR9 7TA

BY POST AND EMAIL

24705/A3/TA/sw

20th May 2015

Dear Sir,

**WARWICK DISTRICT LOCAL PLAN EXAMINATION – COMMENTS ON COUNCIL'S
SUBMISSIONS FOLLOWING MATTER 3 HEARING SESSION**

We write on behalf of our Client, Kler Group, to provide comments on Warwick District Council's submissions following the Matter 3 Hearing Session.

At the Hearing Session it was discussed at length that the housing supply identified in the Council's Hearing Statement to Matter 3 provided minimal flexibility, with no discount or allowance made for non-implementation. The position advanced in the Council's 'Revised Approach to Urban SHLAA Sites and Windfall Allowance' document (EXAM 20) erodes this minimal flexibility completely and results in a shortfall of 75 dwellings in the housing supply across the Plan period against the 12,960 dwelling requirement of the Local Plan.

To ensure flexibility across the Plan period it is our view that, similar to the approach taken to five year housing land supply, a buffer of 5% should be included in the Council's housing supply across the Plan period. On the basis of the housing requirement being 12,960 this buffer would equate to 648 dwellings.

Notwithstanding the above, Barton Willmore advanced the case at the Matters 1 and 2 Hearing Sessions that the Council's objectively assessed need is more likely to be 18,648. In this instance a 5% buffer would equate to 933 dwellings.

At the Matter 3 Hearing Session the Council clarified that they had included the site at Burrow Hill Nursery in Burton Green (Site Reference: H24) within their five year housing land supply, yet the housing trajectory included in the EXAM 19 document shows the site not delivering any housing until 2026/27. There are concerns regarding the availability and deliverability of this site during the current Plan period owing to the impact of HS2, as outlined in our Matter 3 Hearing Statement and within the discussion at the subsequent Hearing Session. We also highlighted the wider impact of HS2 on Burton Green, identified as a 'Growth Village' in the emerging Plan, which could result in a net loss of 115 dwellings from the Council's housing land supply.

On the basis of the above it is our view that the Council should address the shortfall in their supply by undertaking Option 3b, identified in EXAM 20, and look to allocate sites for a high level of additional supply, including the release of Green Belt sites in the most sustainable locations. Whilst

this option may result in a delay to the Plan it is considered the most robust approach to providing a sufficient housing supply to meet the District's objectively assessed housing needs in accordance with the National Planning Policy Framework.

In this context we consider that the site at and to the rear of the Peeping Tom Public House in Burton Green would be a suitable site to make a contribution towards the shortfall in the Council's housing supply. It is available and deliverable now, it would be unaffected by HS2, both during construction and once operational. The benefits of the site are summarised below:

- Development of the site would be high quality, and would be well contained by existing and proposed landscaping ensuring development would not result in unrestricted sprawl, reducing the potential for adverse effects on the perception of the openness of the Green Belt and landscape character.
- The site is in a sustainable location, within walking distance of Burton Green Primary School, Tile Hill railway station, Warwick University, regular bus services and employment opportunities at Charter Avenue and Industrial Estate and Westwood Heath.
- Adequate access can be provided in order to deliver residential development at the Site to the rear of the Peeping Tom Public House.
- The Green Belt Review and Landscape and Visual Report undertaken by Barton Willmore in January 2014 and submitted with our representations to the Local Plan demonstrates that there is potential to establish residential development within the site with very limited adverse landscape and visual effects.
- Development of the site would include a commitment to the Peeping Tom Public House and potentially enhancing its offer, as well as ensuring a geographical spread of development within the village.

We trust our comments will be taken into consideration.

Yours faithfully,



TOM ARMFIELD
Senior Planner