

**WARWICK DISTRICT COUNCIL LOCAL PLAN EXAMINATION - MATTER 12:
HOUSING POLICIES**

This Statement is prepared on behalf of Taylor Wimpey UK Ltd in relation to their various land interests within Warwick District. We respond to each relevant question in turn below.

Policy H0: Overarching Policy**1) Should it be amended to reflect the Council's position in terms of accommodating unmet needs from other authorities? How could this be done?**

1.1 Yes. We consider that the policy should be amended to reflect the Council's position in terms of accommodating unmet needs from other authorities, including Coventry City Council. This is considered important as the Council needs to assist in meeting the needs of the Housing Market Area (in accordance with paragraph 47 of the NPPF), as has been incorporated into Policy DS2 within the Proposed Modifications. We would suggest that similar wording could be incorporated into Policy H0 to achieve this objective.

1.2 We would suggest that the following is added to criterion a) of the Policy to reflect the position of unmet need from other authorities:

"a) provide in full for the District's Housing Requirement and for unmet housing need arising from outside the District where this has been agreed in accordance with Policy DS2."

Policy H1: Directing New Housing**3) Is the approach to development beyond settlement boundaries appropriate and justified? Is it sufficiently flexible?**

3.1 No. We are not of the opinion that the approach offers sufficient flexibility to deliver the required number of dwellings over the Plan period. We would refer to numerous suitable and logical sites within the District which could come forward for development such as land to the north of Hampton Magna, to which we have previously made representations upon, and would provide an opportunity to sustainably expand development currently outside of settlement boundaries.

3.2 In the case of the release of the site to the north of Hampton Magna, this would necessitate the release of the site from the Green Belt. Although we are of the opinion that the site is readily available and deliverable now, there also remains the opportunity to safeguard the land

for future development. Without doing so, this leaves the Plan with little room for flexibility and headroom of around 7%. As with a number of sustainable settlements, Hampton Magna is constrained by Green Belt and consequently the opportunity to release further land will not come around again until the next Plan review.

3.3 By safeguarding land such as that to the north of Hampton Magna, this will ensure that the District has identified longer-term areas for growth, ensuring permanence to the Green Belt beyond the Plan period in accordance with paragraph 83 of the NPPF.

4) Are the boundaries themselves appropriate and justified? Are any modifications required?

4.1 On the whole we consider that the boundaries to settlements are appropriate and justified.

4.2 We have separately made representations to the Proposed Allocation of H28 in Hatton Park, whereby we consider that logically the boundary should be extended along that of Ugly Bridge Road to the east and Smith's Covert to the north. This amendment would allow for the allocation to come forward as a comprehensive development of the site and allow for the sufficient landscaped border to Ugly Bridge Road and Smith's Covert to the north to be incorporated, as well as providing permanent Green Belt boundaries.

4.3 We would also comment that the site at Old Milverton is proposed for safeguarded land (Sites H44 and S2) has the potential to come forward during an earlier stage of the Plan period rather than remain as safeguarded land for future development. This would assist in the comprehensive redevelopment of the site as a whole and add additional flexibility to the plan in accordance with the delivery and trajectory proposed which we have previously provided comments upon.

4.3 We further consider land to the north of Hampton Magna (east of Birmingham Road) to provide a suitable and sensible site for proposed development which offers logical and permanent boundaries to the Green Belt. We have previously made representations in relation to this site and so will not enter into detail the points previously raised in support of the site.

4.4 The site would offer the opportunity to provide additional flexibility to the Plan in terms of the delivery of the required housing numbers to meet the objectively assessed need and that of unmet need of adjoining authorities. The site offers a logical and sustainable extension to a Growth Village, being in close proximity to public transport interchanges and existing services and facilities within the village itself.

Policy H2: Affordable Housing**11) Is the policy sufficiently flexible, particularly in terms of the effect on viability and the potential for off-site contributions?**

11.1 We consider that the policy is sufficiently flexible to allow for negotiation on the delivery of affordable housing should viability issues be a potential issue on any site coming forward for development. It is set out in the policy that in exceptional circumstances, contributions of an equivalent value in lieu of on-site delivery will be acceptable.

11.2 It is understood that a demonstration of such exceptional circumstances can be undertaken through an appropriate viability assessment which should remain as commercially sensitive information throughout the application process.