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(Representations submitted by email to [newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk))

22<sup>nd</sup> April 2016

**Re: Proposed Modifications (2016)**

Dear Sir/Madam,

**Introduction**

Gladman Developments Ltd (Gladman) specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, Gladman understand the need for the planning system to deliver the housing and economic needs of an area, whilst responding positively to the wider opportunities for growth.

Gladman have considered the documentation and accompanying sustainability appraisal prepared by the Council, which propose additions and changes to the Warwick District Local Plan as was submitted originally to the Secretary of State for examination. Since the initial phase of the examination concluded in May 2015 significant progress has been made by both the Council and the surrounding districts within the Coventry and Warwickshire Housing Market Area (HMA), which have necessitated changes to the plan. Gladman note the significant amount of work undertaken by the Council since the pause in the examination.

**Objectively Assessed Need and the Housing Market Area**

The Inspectors Interim Findings effectively found the plan unsound, and recommended the Council withdraw the plan, however following discussions involving the Secretary of State it was considered that a more practical way forward may be for further joint working to be undertaken to attempt to address, amongst other things, the unmet housing needs of the HMA. Since that time the HMA authorities, with the exception of Nuneaton and Bedworth, have signed a Memorandum of

Understanding to deal with the level of unmet need. This has led to a proposed modification to increase the housing requirement for Warwick from 600 to 932 dwellings per annum.

Gladman still have a level of concern about how the underlying figure of 600 dwellings per annum for Warwick may have been derived, but are supportive of the Council in its approach of attempting to tackle the unmet needs of the HMA. It is, however, also understood that Nuneaton and Bedworth are reluctant to take their share of the unmet need, this relates to the claimed constraints in the authority. Indeed in the Pre Submission version of the Nuneaton and Bedworth plan there was a shortfall of some 201 units per annum against the requirement for the authority when incorporating its share of the unmet needs of the HMA. There is therefore a concern about whether or not the housing needs of the HMA are being met in full, this was one of the Inspectors key concerns in the original interim findings. We therefore question the soundness of **Modifications 4, 5, 6, 17 & 18**.

There may be a need to revisit the housing requirement, in the very least to incorporate the full picture on unmet housing needs for the HMA. It is also worth noting that this current unaccounted for housing need of 201 units per annum is not dissimilar to the 234 figure of unmet need which the Inspector considered significant in his interim findings<sup>1</sup>. Gladman have concerns therefore that the Local Plan is not fully dealing with the issue of unmet need, which we already know exists. In that context we question the soundness of the current mechanism for plan review, which in theory could trigger an immediate review of the Local Plan. It would seem sensible to deal with these issues now.

We would also note that with regard the wider level of housing need there is still an absence of information with relation to the unmet housing need emanating from the Birmingham HMA. The recently published Inspectors report into the Birmingham Local Plan identifies a level of unmet of housing need of 38,000<sup>2</sup> a considerable figure. The impacts of this considerable level of unmet need must be considered not only in the context of how this level of unmet need may influence Warwick District directly, but also if there are knock on impacts for the other partners in the Coventry HMA. As we have addressed above there is already doubt with one member as to whether it can meet the Coventry HMA needs.

All of the above noted the proactive planning and evidence prepared by Warwick and the HMA partners is supported. This is especially true in relation to the evidence and subsequent proposals with regard to sustainable releases from the Green Belt. Whilst therefore we believe there may need to be further consideration of what the OAN for the district is, following further discussion with Nuneaton and Bedworth and Birmingham, we believe this can be done in an expedient fashion to allow for considerations to be taken into account and for that element of the plan to be ultimately sound.

## **5 Year Land Supply**

In addition to the above the current picture on 5 year housing land supply, which the plan will provide upon adoption, is unclear. Whilst Gladman acknowledge the trajectory produced alongside the Proposed Modifications it is not made directly clear how this translates to a land supply position for Warwick moving forward. From our initial calculations, and using the data as submitted in the Councils trajectory, for the period 2016/17 to 2020/21 we calculate that only a **4.53 year land supply** exists. We are unsure therefore how, or indeed if, the Council are claiming that the submitted plan will

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<sup>1</sup> Para 21 Inspectors Interim Findings 1<sup>st</sup> June 2015

<sup>2</sup> Para 217 Report of the Examination of the Birmingham Development Plan 11<sup>th</sup> March 2016

provide a 5 year housing land supply upon adoption. We would note that there will need to be a detailed examination of all of the Councils proposed sites, lead in times, build out rates and other associated evidence once a detailed 5 year land supply position for the plan is published by the Council. Our view as expressed in this letter should therefore be seen as our interim position and subject to change following consideration of the information discussed above.

### **Conclusion**

With all of the above points noted we do, however, consider that whilst the plan may be considered **unsound** at present the issues raised in this representation can be resolved to enable Warwick to adopt a sound plan. Given the position on 5 year land supply and the remaining unmet housing need, from at least the Coventry HMA, we would contend that there is a need to allocate an additional layer of small to medium sites (circa 50-150 dwellings per site). These will be required to deliver additional housing in the first 5 years of the plan period, to meet both the additional level of unmet HMA need and to provide a 5 year land supply. We believe that by identifying such sites, either through the allocation of omission sites or by giving consideration to the extension or enlargement of existing smaller allocations, it will be possible for the soundness issues expressed in this letter to be overcome and for a sound plan to be finalised.

We trust that these representations are helpful, we would request the right to be heard at the reconvened examinations to discuss the above points in further detail and to elaborate on the points expressed in this letter.

Yours faithfully

Mathieu Evans  
Planning Policy Manager  
Gladman Developments