



---

CLlr Andrew Mobbs  
Leader of Warwick District Council

Our Ref:

PINS/T3725/429/5

Date:

28 August 2015

---

Dear Councillor Mobbs,

## **Examination of the Warwick District Local Plan: request for suspension of the examination**

1. Thank you for your letter of 13 August 2015 in which you request a suspension of the examination. I appreciate the Council's willingness to seek to address the issues raised in my letter of 1 June 2015 in a constructive and pragmatic manner.
2. I note the discussions that have taken place with the other Coventry and Warwickshire authorities and that additional joint working is underway. As I understand it the intention is to undertake further work on the Objectively Assessed Need (OAN) for housing, complete capacity assessments and reach agreement on the distribution of housing provision to meet the identified needs for the Housing Market Area (HMA) in full, including any unmet needs from particular authorities. I note that a new Memorandum of Understanding will be recommended to the Shadow Economic Prosperity Board on 29 September 2015. This is a welcome development and brings forward the timescale for this process considerably compared with that presented to me at the initial hearings. My understanding is that the intention is for identified housing needs to be met in full through this round of plan making; again this is a welcome development.
3. Subject to the outcome of this joint working, you indicate a willingness to consider an increased housing requirement to accommodate a proportion of unmet needs from Coventry and to put forward additional site allocations or broad locations for growth, along with modifications to Policy DS20. I also note the intention to put forward additional site allocations to address my concerns over the reliance on windfall sites and the need to provide for an adequate housing land supply with a degree of flexibility.
4. You request a suspension of the examination until March 2016 to allow necessary work and consultation to be undertaken. However, much relies on the outcome of joint working currently underway and the meeting of the Shadow Economic Prosperity Board planned for 29 September 2015. In advance of this, it is not yet clear that there will be a strategy to meet the

housing needs of the HMA in full within this round of plan making. The level of housing provision required in Warwick District to achieve such a strategy is also not yet clear. The latter point has obvious implications for the amount of additional housing site allocations that may be required.

5. Whilst noting your views on the matter, I remain concerned over the potential extent of change to the submitted plan in terms of the scale and distribution of additional site allocations, particularly given the significant proportion of the District covered by Green Belt. I am also concerned that the process of identifying sites and potentially also broad locations for growth could well take longer than envisaged given the need to fully consider options and appraise them and the potential need for close working with neighbouring authorities for instance in relation to infrastructure provision. Full public consultation on potential additional sites would be necessary and experience elsewhere shows that this is likely to generate considerable interest from local communities and the promoters of alternative sites.
6. The Council itself highlighted concerns over the likely impact of identifying significant additional site allocations and broad locations for growth immediately following the initial hearings (para. 20 of EXAM 20).
7. I have reconsidered the option of suspending the examination in light of the proposals put forward in your letter and the further co-operation that has taken place between authorities since the initial hearings, in particular the revised timescale to identify and fully address housing needs in the HMA. I consider that in principle a suspension of the examination may be an appropriate way forward.
8. However, as set out above, at this point in time there is uncertainty as to the outcome of joint working, the scale of additional site allocations that would be required and how they would be brought forward. I remain concerned over the extent of change to the submitted plan and have some doubts regarding the realism of the timescale to bring forward and appraise site allocations and broad locations for growth.
9. It seems to me that a key stage in the process will be the outcome of the meeting of the Shadow Economic Prosperity Board on 29 September 2015. Hopefully this, along with other information you intend to provide, will help to clarify matters, particularly the scale of additional allocations required and the approach to identifying them. I will therefore review the situation following the outcome of that meeting and once the Council has provided me with the information referred to in your letter. It would be helpful if the Council could also provide further clarification at that stage in terms of how it intends to identify additional housing land i.e. through site allocations or broad locations and the process involved. In the meantime I can confirm that the examination process will be held in abeyance.

Yours sincerely

*Kevin Ward*

INSPECTOR