

## Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

### 4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Local Plan

Paragraph Number:

Policy Number:

DS6

Policies Map Number:

### 5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes

No

5.2 Complies with the Duty to Co-operate?

Yes

No

5.3 Sound?

Yes

No

### 6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

For Official Use Only

Person ID:

Rep ID:

**7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Please see below

Continue on a separate sheet if necessary

**8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The Plan period should be extended to 2031. The housing requirement should be increased to include provision for the additional two years. It should also be increased to make provision for housing needs arising from adjoining authorities and for other reasons as set out by other objectors.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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Person ID:

Rep ID:

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**11. Declaration**

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed: 

Date : 25/06/2014

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

- Q7 Policy DS6 sets out the total number of houses which will be provided within the District between 2011 and 2029. There are two key issues with this:
- That the plan period is too short; and
  - That the total housing requirement is too low
- Failure in this respect means the Plan is not positively prepared, is not justified and is not consistent with national policy.

As outlined in a separate response to Paragraph 1.29 the Council has no justification for planning only until 2029. For the reasons outlined in that separate response the Plan period should be extended to 2031 as a minimum, not least because this will give 15 years post adoption, but also because it would then fall in line with the Joint Coventry and Warwickshire Strategic Housing Market Assessment 2013. Failure to do this means the plan is not justified and is not consistent with national policy

Extending the timeframe for the Local Plan will inevitably result in a higher housing requirement. There are several other reasons why the overall housing target might increase and other parties will look in detail at these using recognised forecasting methods. It is not proposed to repeat the arguments here. However it is noted that the Plan fails to make provision for some of the acknowledged shortfall arising from the West Midlands conurbation, particularly Birmingham, Solihull and Coventry. Each of these authority areas has accepted they are unable to meet their own housing needs in full and will be looking to have the shortfall met by surrounding Districts. The precise distribution of that shortfall has yet to be determined, but some allowance should be made within Warwick District even at this early time.

Failure to do so means that the plan is not positively prepared - it does not meet the objectively assessed housing needs from within its own boundaries and from neighbouring authorities; it is not justified – it does not adopt the most appropriate strategy; and it is not consistent with national policy which requires the objectively assess housing needs to be met, to include cross boundary provision where necessary.