

Publication Draft Representation Form 2014

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|-------------------|--|
| For Official Only | |
| Person ID | |
| Rep ID | |

This consultation stage is a formal process and represents the last opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) before it is submitted to the Secretary of State. All comments made at this stage of the process are required to follow certain guidelines as set out in the Representation Form Guidance Notes available separately. In particular the notes explain what is meant by legal compliance and the 'tests of soundness'.

This form has two parts:

- Part A – Personal Details
- Part B – Your Representations

If you are commenting on multiple sections of the document, you will need to complete a separate Part B of this form for each representation on each policy.

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the plan has been made available (see the table below). You can also respond online using the Council's e-Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be received by 4.45pm on Friday 27 June 2014

To return this form, please deliver by hand or post to: Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH or [email: newlocalplan@warwickdc.gov.uk](mailto:newlocalplan@warwickdc.gov.uk)

Where to see copies of the Plan

Copies of the Plan are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and at the following locations:

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| Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa |
| Leamington Town Hall, Parade, Royal Leamington Spa |
| Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash |
| Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa |
| Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick |
| Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth |
| Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa |
| Brunswick Healthy Living Centre , 98-100 Shrubland Street, Royal Leamington Spa |
| Finham Community Library, Finham Green Rd, Finham, Coventry |

Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.

Part A - Personal Details

| | 1. Personal Details* | 2. Agent's Details (if applicable) |
|-------------------------------|--|------------------------------------|
| | * If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2. | |
| Title | Mr | Mr |
| First Name | Bernard | Tom |
| Last Name | Swindells | Armfield |
| Job Title (where relevant) | | |
| Organisation (where relevant) | C/o Agent | |
| Address Line 1 | | |
| Address Line 2 | | |
| Address Line 3 | | |
| Address Line 4 | | |
| Postcode | | |
| Telephone number | | |
| Email address | | |

3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination Yes No

Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Yes No

The adoption of the Local Plan. Yes No

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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: | <input type="text" value="Local Plan"/> |
| Paragraph Number: | <input type="text"/> |
| Policy Number: | <input type="text" value="Strategic Policy DS6 (level of Housing Growth)"/> |
| Policies Map Number: | <input type="text"/> |

5. Do you consider the Local Plan is :

| | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|
| 5.1 Legally Compliant? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| 5.2 Complies with the Duty to Co-operate? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| 5.3 Sound? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

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: | <input checked="" type="checkbox"/> |
| Justified: | <input type="checkbox"/> |
| Effective: | <input type="checkbox"/> |
| Consistent with National Policy: | <input type="checkbox"/> |

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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.

Emerging Policy DS6 establishes that the Council will provide for 12,860 new dwellings between 2011 and 2029.

In the context of the Council's housing requirement, it is noted that emerging Policy DS2 highlights that the Council will provide in full for their Objectively Assessed Housing Need and ensure that new housing delivers the quality and mix of homes need in the District, including affordable homes and a mix of homes to meet identified needs.

Paragraph 7.79 of the Coventry and Warwickshire Joint Strategic Housing Market Assessment (SHMA), published in November 2013, identifies at page 111 (extract enclosed) that the overall evidence of the SHMA points to a need for a minimum of 660 homes per year, however the evidence does suggest that this would result in some suppression of housing formation. Therefore it considers that an appropriate level of provision, based on the evidence provided, would be around 720 new homes a year.

The housing requirement proposed by the Local Plan Publication Draft is therefore considered to not be positively prepared, as it is not based on the Objectively Assessed Housing Need, contrary to the NPPF and emerging Policy DS2.

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.**

It is our view that the housing requirement established in the Local Plan Publication Draft should be increased to 12,960 if emerging Policy DS6 is to be considered to be positively prepared and sound in the context of paragraph 182 of the NPPF.

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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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:

We wish to reserve the right to participate at the oral part of the Examination to emphasise the proposed amendments to emerging Policy DS6.

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:

Tom Armfield

Date :

18th June 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.

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