

## Publication Draft Representation Form 2014

For Official Use 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](http://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](http://www.warwickdc.gov.uk/newlocalplan) and at the following locations:

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

	<b>1. Personal Details*</b>	<b>2. Agent's Details (if applicable)</b>
	<small>* 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.</small>	
Title	Mr	Mr
First Name	Karl	John
Last Name	Hallows	Sneddon
Job Title (where relevant)	Development Director	Managing Director
Organisation (where relevant)	Methodist Homes	Tetlow King Planning
Address Line 1		Unit 2, Eclipse Office Park
Address Line 2		High Street
Address Line 3		Staple Hill
Address Line 4		Bristol
Postcode		BS16 5EL
Telephone number		0117 9561916
Email address		all@tetlow-king.co.uk

### 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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| The adoption of the Local Plan.  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

For Official Use Only

Person ID:

Rep ID:

## 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:

4.52 to 4.59

Policy Number:

H5

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 refer to the separate sheet attached to this submission

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.

Please refer to the separate sheet attached to this submission

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.**

For Official Use Only

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.

*Iain Warner*

on behalf of Tetlow King Planning

Signed:

27 June 2014

Date :

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.

For Official Use Only

Person ID:

Rep ID:

## REPRESENTATIONS IN RESPECT OF DRAFT POLICY H5

**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 to 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 co-operate, please also use this box to set out your comments.**

We consider that the inclusion of a specific policy to ensure the delivery of specialist accommodation for Older People is to be applauded and is in accordance with national policy. The National Planning Policy Guidance (NPPG) clearly sets out the requirement for Local Planning Authorities to meet the full objectively based housing needs (paragraph 47), and that new housing delivery should meet current and future demographic trends including those for older people (paragraph 50). This is reinforced at paragraph 159 in respect of the preparation of Strategic Housing Market Assessments and the requirement to Address “the need for all types of housing...and the needs of different groups in the community (such as, but not limited to...older people...)”

More recently the National Planning Policy Guidance (PPG) continues to demonstrate the government’s commitment to ensuring the delivery of this specialist housing, as noted in the Ministerial Statement accompanying the PPG which referred to including the delivery of housing for older people when assessing housing need as one of the 13 main topics of the guidance.

The PPG sets out under the heading ‘Housing and Economic Development Needs Assessments’ that:

“The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important.” [My emphasis]

The PPG further states under the heading ‘Housing and Land Availability Assessment’ that:

“Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan”. [My emphasis]

National guidance is therefore clear that the delivery of housing for older people is a crucial requirement of new housing delivery, and that Local Plans should provide the means by which to ensure this delivery.

The approach set out within the Draft Local Plan under Policy H5 and its supporting text seeks to link the delivery of this form of specialist housing with identified need as demonstrated within the Strategic Housing Market Assessment and agreed by the Warwickshire County Council. Whilst we consider that this is a sensible approach we would suggest some minor revisions to the wording of

the policy to ensure that it remains up to date at all times following any subsequent adoption, and so that it can also be measured against in terms of policy compliance. Notwithstanding these minor modifications, which only propose to include details that are otherwise set out in the supporting explanation paragraphs to the policy, we endorse the Council's approach to addressing this particular topic of housing need.

**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.**

As set out above, we endorse the Council's general approach to ensuring the delivery of specialist housing for older people and consider that this is in compliance with national policy. Notwithstanding this, we consider that some minor modifications to the wording of draft policy H5 will ensure that it is more robust and can be more effectively measured for compliance. On this basis we are suggesting the following revisions (highlighted in bold, with any deleted text struck out):

H5 Specialist Housing for Older People

Planning permission for specialist housing for older people will be granted where:

- a) the site is in close proximity to shops, amenities and public transport; and
- b) it can be demonstrated that satisfactory Primary Health Care services to serve the residents of the development will be available within reasonable proximity; and
- c) the development makes a positive contribution towards meeting the identified need **1,800 units of** specialist housing for older people **over the plan period** as identified in the ~~latest~~ **2013 Strategic Housing Market Assessment (or otherwise updated assessment of need)** and as agreed by Warwickshire County Council (as the provider of Adult Social Care).

The identification of a figure of 1,800 units over the plan period is expressed in paragraph 4.55 of the Local Plan, however we consider that this number would be better expressed within the policy itself in order to ensure that successful monitoring of the policy can be achieved. Without the proposed revisions to the policy wording we consider that the Council will struggle to be able to effectively monitor the delivery of this policy, and the effective provision of specialist housing for older people.