

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		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)	CREST STRATEGIC PROJECTS	D2 PLANNING LTD
Address Line 1		NITES 3 + 4
Address Line 2		WESTBURY COURT
Address Line 3		WESTBURY ON TRYM
Address Line 4		BRISTOL
Postcode		BS9 3BF
Telephone number		0117 3731666
Email address		d2developed2planning.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"/>

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:

STRATEGIC POLICY 056

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.

156 ATTACHED

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.

156 ATTACHED

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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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:

THE ISSUES RAISED NEED TO BE THE SUBJECT OF ADVICE AT
THE EXAMINATION

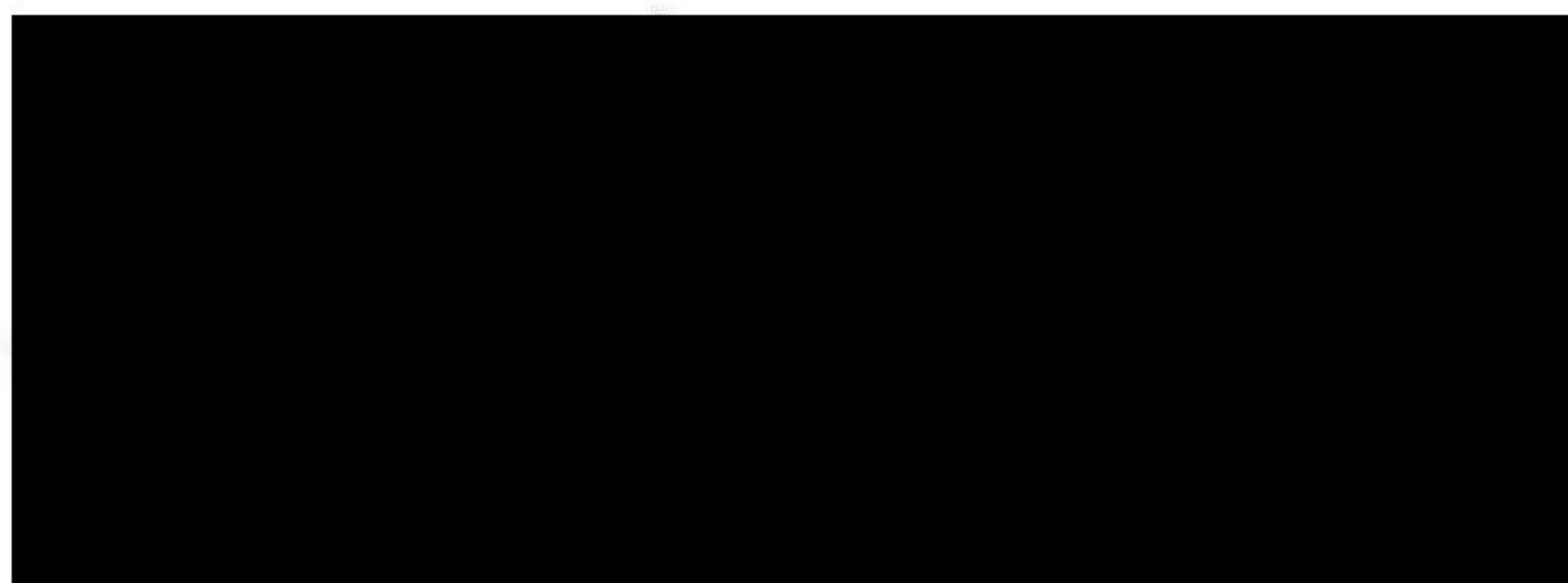
Continue on a separate sheet if necessary

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 :

24/6/2014

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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Rep ID:

Policy DS6 – Level of Housing Growth

Policy 159 of the NPPF requires Local Planning Authorities to assess their full housing needs including identifying the unmet needs of adjoining Districts.

Policy DS7 proposes 12,860 new dwellings between 2011 and 2029 to satisfy the housing needs of Warwick District Council i.e. 718 dpa.

However, the Joint SHMA indicates that the annual housing needs for the District is between 660 houses per annum to 772 houses per annum. A mid range figure has been arrived at albeit it is unclear what justification exists for this figure. The Local Plan accordingly makes provision for 718 dpa.

The Final Joint SHMA models 11 different scenarios including zero net migration, 5 year migration trends, 10 year migration trends, SNPP, undated SNPP, 2008 household rates, hybrid midpoint hardship rate 2010 employment growth, jobs baseline, resident in employment and post completions set out in Tables 49 and 50 (page 112). The housing projection rate is representative of Projection 1 (SNPP) but below Projection 1A (SNPP) updated of 13,173, Projection 2 (10 year mitigation trends of 14,497). Projection A (jobs baseline of 14,035 and Projection B (resident in employment) of 13,384) Projection 1A 2008 Headship of 15,441 and Projection 1A Midpoint Headship of 14,363.

The Council has provided no reasoned justification for selecting 718 dwellings per annum, especially as its housing requirement is considerably higher than this figure i.e. up to 900 dwellings per annum.

An increase in the overall housing provision would assist in meeting the high level of affordable housing need identified in the report. G L Hearn consultants recommend the provision of 268 dwellings per annum in supporting the stronger delivery of affordable housing.

The SHMA also does not identify un-met need in other areas. Paragraph 7.83 of the Coventry & Warwickshire SHMA Final Report states that the housing requirements do not include for any allowances for shortfalls in supply beyond the HMA.

Just as LPA administrative areas are not self-contained entities with border controls neither are HMAs. The DCLG Advice Note 'Identifying Sub-Regional Housing Market Areas' published in March 2007 in paragraph 6 states that

“sub-regional housing market areas are geographical areas defined by household demand and preferences for housing. They reflect the key functional linkages between places where people live and work.”

It is vitally important to consider inter relationships between neighbouring authorities and HMAs when formulating housing and development policies.

Coventry City Council was found to have failed to fulfil the legal requirements of the Duty to Co-operate especially because of the lack of joint SHMAA. Coventry’s withdrawn Core Strategy proposed a minimum of 11,373 dwellings (669 dwellings per annum) between 2011 – 2028 informed by a city only based assessment. Whereas the up-dated Coventry & Warwickshire SHMA Final Report recommends a minimum of 1,040 dwellings per annual (17,680 dwellings) and an assessed need of 1,180 dwellings per annum (20,060 dwellings) for Coventry City.

Of greater concern is Birmingham City Council’s most recent objective assessment of housing need, which indicates a requirement for between 80,000 to 105,000 new homes over its revised plan period 2011 – 2031 with only sufficient land (including windfalls) within its own administrative area to accommodate 43,000 new homes. At the minimum housing need of 80,000, there is an unmet need of 37,000 dwellings. Birmingham City Council is concerned that the emerging issue of its unmet housing needs is recognised and dealt with by plans well advanced in the plan making process but without stalling progress of such plans. As a neighbouring authority Warwick should give consideration to unmet need arising in Birmingham.

Policy DS7 is unsound because it is not based on the most up to date evidence and the housing requirement should be increased. The Council should be planning for up to 900 dwellings per annum based on the latest evidence presented in the Final Joint SHMA.