

Warwick District Local Plan Proposed Modifications 2016**Supporting Statement to Accompany Response to Proposed Modifications Refs.
Mods 4, 5 and 6****On behalf of a Consortium of Developers**

- 1.1 This statement is prepared on behalf of a Consortium made up of several leading national house builders and developers with interests across the Coventry and Warwickshire Housing Market Area (HMA). Detailed representations with accompanying evidence on the issue of Objectively Assessed Housing Need (OAHN) were submitted to the Warwick District Local Plan Publication Draft in June 2014 and subsequently we submitted further updated evidence to the Council in February 2015 and more recently appeared at the Initial Examination Hearing for Matters 1 and 2.
- 1.2 This statement provides a composite response in relation to the following **Proposed Modifications: Ref. Mods 4, 5 and 6.**

Background

- 2.1 On behalf of the Consortium, Barton Willmore has undertaken research with regard to the OAHN within the wider HMA, highlighting concerns that evidence provided within the Joint SHMA of November 2013 and its subsequent update in September 2014 had failed to provide a full, objective assessment of housing need within the HMA.
- 2.2 More recently, the relevant authorities within the HMA commissioned a further update to the assessment of OAN for the HMA, as detailed within the 'Updated Assessment of Housing Need' by G L Hearn of September 2015. This update was reviewed by Barton Willmore's Research Team, alongside a review of our previous work and more recent evidence, resulting in the preparation of a further update of our OAN Report which is enclosed with these representations. This continues to show that in order to fully accommodate forecast economic growth and in turn address worsening market signals issues, there is a requirement for **at least 5,005 dwellings per annum / 100,100 dwellings in total across the HMA during the Plan period 2011-2031**. This indicates a shortfall in the full, objective assessment of housing need across the HMA of **at least 14,660 dwellings** when compared against the most

recent update to the joint SHMA of September 2015, indicating a requirement of 4,272 dpa / 85,440 dwellings in total. It should be noted that our assessment of the full, OAN for the HMA makes no allowance to meet any unmet need arising from outside the HMA, including that from Birmingham City.

- 2.3 The same evidence prepared on behalf of the Consortium has been issued to other relevant authorities within the HMA, most notably Stratford-on-Avon District Council as part of the Examination of their development plan, as well to the emerging Local Plans for Coventry, Nuneaton and Bedworth, Rugby and North Warwickshire.

Why the Proposed Modifications are considered to be Unsound

- 3.1 As detailed above, the evidence base on which the Council has determined its OAHN for the District is not considered to provide a full and objective assessment of housing need within the wider HMA. As a result, it is considered that there is a significant risk that the Plan as proposed for modification continues to fail to plan adequately to meet the housing needs of the HMA.
- 3.2 As such, the Consortium consider that the Plan as proposed to be modified, and particularly Mods 4, 5 and 6, is unsound for the following reasons:
- It is not positively prepared – the Plan fails to identify and meet in full, the objectively assessed housing needs of the HMA as required by the Framework;
 - It is not justified – the Plan does not represent the most appropriate strategy as the evidence indicates that housing need across the HMA is much higher and the most appropriate strategy would be to ensure this is met in full, as required by the Framework;
 - It is not effective – the Plan is not based on effective joint cross-boundary strategic priorities, particularly meeting in full the objectively assessed housing needs of the HMA; and
 - It is not consistent with national policies – the Plan is based on evidence that does not provide a full, objective assessment of housing needs for the HMA that is compliant with national policy. As such, the Plan itself cannot be considered to be consistent with national policy if the evidence it is based on is unsound.

What Changes are proposed to make the Plan Sound

- 4.1 In order to address the concerns raised above and by the accompanying report, the full, OAHN for the HMA should be reviewed in light of more recent evidence in order to ensure that the Plan is based on a sound evidence base prior to progressing further with the Examination, and that the associated implications of meeting the increased unmet need can be fully planned for by the relevant authorities within the HMA through the Duty to Cooperate.

- 4.2 Subject to the above, changes to Policy DS6 and DS7 would be necessary should it be found that a higher housing requirement within the District was appropriate. Other related to changes to the Plan as a result of any increase in the housing requirement would also need to be made as necessary.

Why is it considered necessary to attend the Oral Examination

- 5.1 We consider it is necessary to attend the oral examination in order to present the detailed evidence which accompanies these representations and to respond to any questions from the Inspector and/or Council that may arise.