

Consultation on Proposed Modifications (2016) Response Form

For Official Only	
Person ID	
Rep ID	

Please use this form if you wish to support or object to the Proposed Modifications

This form has two parts:

Part A – Personal Details
Part B – Your Representations

If your comments relate to more than one proposed Modification you will need to complete a separate Part B of this form for each representation.

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the Modifications have 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 returned by **4.45pm on Friday 22 April 2016**

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

Where to see copies of the documents:

Copies of the proposed Modifications, updated Sustainability Appraisal and all supporting documents are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and also at the following locations:

- 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, CV3 6EP

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
First Name		Tim
Last Name		Watton
Job Title (where relevant)		Technical Director
Organisation (where relevant)	Lenco Investments	RPS Planning & Development
Address Line 1		Highfield House
Address Line 2		5 Ridgeway
Address Line 3		Quinton Business Park
Address Line 4		Birmingham
Postcode		B32 1AF
Telephone number		0121 213 5500
Email address		Tim.Watton@rpsgroup.com

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 Modifications to the appointed Inspector

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

4. To which proposed Modification to the Submission Plan or the updated Sustainability Appraisal (SA) does this representation relate?

Modification or SA:	<input type="text"/>
Mod. Number:	<input type="text" value="Mod 4"/>
Paragraph Number	<input type="text"/>
Mod. Policies Map Number:	<input type="text"/>

5. Do you consider the Local Plan is :

5.1 Legally Compliant? Yes No

5.2 Sound? Yes No

6. If you answered no to question 5.2, do you consider the Proposed Modification is unsound because it is not:

(Please tick)

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modifications, please also use this box to set out your comments.

1. Modification 4 of the Council's consultation document proposes an adjustment to Policy DS6: Level of housing growth. The modification proposes an increase of 3,916 dwellings across the plan period, taking the Council's requirement to 16,776. The reason behind this uplift is to align figures with those agreed by the Coventry and Warwickshire authorities as part of a Memorandum of Understanding (MoU), published in September 2015.
2. There are two strands to this calculation; the Full Objectively Assessed Need for housing (FOAN) in the district and secondly, the proposed distribution strategy to meet unmet need from Coventry. These are both technical issues and warrant separate interrogation.

Full Objectively Assessed Need

3. There are concerns that the FOAN presented as part of the 2015 SHMA, which has formed the basis of the Council's calculations of housing need. The assessment makes the determination that the demographic component of need for Warwick is 600 dwellings per annum. The SHMA then makes an adjustment for each of the other authorities to reflect the need increase affordability in the HMA. This is done through an adjustment to household suppression in the 25-34 age group. Such an adjustment is not made to Warwick however. Lenco Investments queries the legitimacy of this decision, especially when the SHMA itself provides evidence demonstrating the extent of the issues in the District. A few key points are included below:
 - "Since mid-2012 house prices have increased in all of the HMA authorities reflecting some recovery in the housing market. In absolute terms, the strongest growth in prices was in Warwick District" (paragraph 5.9).
 - "The analysis shows comparatively stronger growth in private rental prices in Warwick where the median monthly price has grown by £130 (22%) since September 2011" (paragraph 5.29).
 - "The average lower quartile price to income ratio in the HMA is equal to the national average at 6.5 (based on 2013 data). It is above this in the southern parts of the county, with a ratio of 6.5 in Warwick" (paragraph 7.29).
 - "The affordable housing need however represents a higher percentage of the demographically based need in North Warwickshire, Stratford-on-Avon and Warwick District" (paragraph 6.59).
4. It is clear from the Council's own assessment that the adjustment for affordability has not been applied correctly. The FOAN for Warwick district cannot be relied upon until this component of housing need is re-evaluated.

Unmet need from Coventry

5. Lenco Investments does not consider that the Council has correctly accounted for the figures within this document and as a consequence, will not be able to meet need from within the District in addition to unmet needs from Coventry.

6. The Coventry and Warwickshire MoU outlines a strategy for Warwick District to take the largest apportionment of unmet need from Coventry, equating to 35.6% of Warwick's overall need. This is a significant figure and one which the Council has agreed to meet in order the Full Objectively Assessed Need for housing (FOAN) identified in Coventry and Warwickshire.
7. This equates to a need for 6,640 dwellings over the plan period, which is set between 2011 and 2031, in a similar way to all other authorities in Coventry and Warwickshire, apart from North Warwickshire – however they are undertaking a review of their plan to align with the MoU. The plan period for Warwick operates between 2011 and 2029. There is no objection to this, as the NPPG is not explicit on the length of plans, leaving the decision in the hands of local authorities.
8. Where the objection remains however, is the calculation for the apportionment from Coventry. The Council's approach applies the 18 year plan period to the 20 year need from Coventry, thus reducing the figure from 6,640 to 5,976. This presents a shortfall of 664 dwellings that will not be met outside of Warwick, thus leaving Coventry's needs unmet.
9. In addition to the Council's method of calculation, there is also concern with the approach to redistribution which has been agreed to as part of the MoU. The approach to calculating this split is included within the agenda for meeting of the Coventry, Warwickshire and Hinckley & Bosworth Joint Committee for Economic Growth and Prosperity board on 29 September 2015, as part of appendices 4 and 5. This methodology remains currently untested in its approach, however it is clear that no other options for distribution have been presented.
10. The approach to use commuting and migration data as indicators of functional links between Coventry and the other local authorities appears to be credible. This information has already been used to define the wider Housing Market Area. As part of this approach, It would have also been useful to consider the impact of Travel to Work Areas (TtWAs), which provide a contextual indicator of the functional economic boundaries, an approach advocated by the NPPG (para 2a-011-20140306 refers).
11. The methodology separates out the components of Coventry's unmet need to reflect an uplift to support economic growth and a further redistribution based on commuting and migration links. The approach taken to justify the proportion of Coventry's need that is related to support economic growth is unclear.
12. The component for supporting economic growth has been applied to North Warwickshire, Nuneaton & Bedworth and Stratford, identified in Table 53 of the 2015 SHMA. This relates to the additional dwellings required in each of these authorities to uplift the FOAN. This does not mean, as the MoU erroneously interprets, is that economic linkages with Coventry are limited to only these three area.
13. This is highlighted by the fact that no uplift has been made to Warwick in this regard, particularly when the Warwick is considered to have the highest levels of commuting and migration to Coventry. The approach here needs further requires further review.

8. Please set out what change(s) you consider necessary to make the Proposed Modifications to the Submission Warwick District Local Plan legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Local Plan/Sustainability Appraisal 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.

Full Objectively Assessed Need

- Adjustments needed to reflect an adjustment to the demographic component, increased for suppressed affordability.

Unmet Need from Coventry

- Warwick should meet the full apportionment of need from Coventry to avoid a shortfall of 664. These figures were agreed as part of the Coventry and Warwickshire MoU and should be adhered to in order to satisfy Duty to Cooperate provisions and the FOAN for the Coventry and Warwickshire HMA.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations. 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 change, 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:

- RPS has presented a number of objections to the Proposed Modifications and would like the opportunity to discuss these matters in more detail.

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:

Tim Watton

Date:

21 April 2016

Copies of all the comments 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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