

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 | | Paul |
| Last Name | | Harris |
| Job Title (where relevant) | | Principal Planner |
| Organisation (where relevant) | | Cerda Planning |
| Address Line 1 | | Vesey House |
| Address Line 2 | | 5-7 High Street |
| Address Line 3 | | Sutton Coldfield |
| Address Line 4 | | West Midlands |
| Postcode | | B72 1XH |
| Telephone number | | 0121 748 1620 |
| Email address | | Paul.harris@cerda-planning.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 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

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

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

| | |
|---------------------------|---|
| Modification or SA: | Modification |
| Mod. Number: | Mod 2, Mod 3, Mod 4, Mod 5, Mod 6, Mod 7, Mod 8, Mod 9, Mod 17 |
| Paragraph Number | Para 2.6, Policy DS4, Policy DS6, Para 2.20, Policy DS7, Para 2.21-2.24, Policy DS10. Paras 2.37 & 2.38 |
| Mod. Policies Map Number: | 18 |

5. Do you consider the Local Plan is :

| | | | | |
|------------------------|-----|-------------------------------------|----|-------------------------------------|
| 5.1 Legally Compliant? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| 5.2 Sound? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

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

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.

See Attached Sheet

Continue on a separate sheet if necessary

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.

See Attached Sheet

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 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.

For Official Use Only

Person ID:

Rep ID:

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:

To discuss the OAHN in the context of unmet housing need from outside district buffers, flexibility of the plan and historic undersupply.

To discuss trajectory and 5 year supply in the context of unmet housing need from outside the district buffers, flexibility of the plan and historic undersupply.

To discuss the merits of additional residential land allocation at Barford.

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:

Paul Harris

Date:

22nd 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.

For Official Use Only

Person ID:

Rep ID:

Warwick District Council - Local Plan Modifications (April 2016)

Modification Policies Map No.18 – Barford

Item 7 (Attached Sheet)

Cerda Planning Ltd has been instructed by Taylor Wimpey (Midlands) Ltd to make representations to the Proposed Modifications (February 2016) to the Warwick Local Plan.

The representations relate to the following modifications **2, 3, 4, 5, 6, 7, 8, 9, 17 and to Policy Map modification 18.**

It is appreciated that the Proposed Modifications are a response to the Local Plan Inspector's interim conclusions issued June 2015.

At present Warwick District's proposed housing target would not appear to account for the Objectively Assessed Housing Need (OAHN) arising from the unmet housing demand being exported from Birmingham.

Paragraph 178 of the Framework requires cross boundary working to meet strategic objectives such as housing delivery. Whilst Proposed Modifications 4 and 5 deal with the exported housing demand from Coventry, there does not appear to be any provision for addressing the inevitable housing demand arising from Birmingham.

The acknowledged shortfall in the housing provision in Birmingham has been set at a minimum of 38,000 homes. This cannot be met within the Greater Birmingham HMA and as a result this unmet will need to be accommodated within the adjoining HMAs, the majority of which are also struggling to accommodate their own OAHN. Given Warwick District's geographical proximity to Birmingham, there is an inevitability to the role that Warwick will need to play in accommodating this overspill demand.

Proposed Modification 6 sets out a total of 17,577 homes which provides a buffer 4.5% (801 dwellings more) than the housing target of 16,776 set out at Modification 4.

Modification 17 notes that there would be a full or partial review of the Plan if changing circumstances could not be accommodated within the existing strategy. The current 4.5% buffer would therefore only be sufficient to deal with very minor changes to the demand or supply. Accordingly, the Plan is not considered sound in so far as there is insufficient flexibility to cater for either i) sites not coming forward for development or ii) greater than anticipated levels of demand. It is submitted therefore that further allocations are required to increase this buffer by at least 100%.

The Council's latest Five Year Housing Land Supply Paper Dated March 2016 sets the annual housing requirement for Warwick based on the OAHN at 600 dwellings and the historic undersupply at 941 dwellings. Planning Policy guidance advocates the use of the Sedgefield method for calculating supply where planning authorities should aim to deal with any under supply within the first 5 years of the Plan period where possible.

Due to the persistent under delivery of housing in Warwick District, it has been accepted that the 20% buffer set out in Paragraph 47 of the National Planning Policy Framework applies.

The effect of this is that the annual housing requirement for Warwick District is increased to 908 dwellings. Modification 5 sets the OAHN at 600 dwellings per annum for Warwick District, with an additional 332 dwellings per annum to meet the unmet housing demand from Coventry. This does not however account for the historic undersupply that must be dealt with in the first 5 years of the plan period or the 20% buffer, nor does it appear to account for the inevitable unmet housing demand for Birmingham.

Furthermore, it does not appear that the minimum 5% buffer has been applied to the unmet housing need from Coventry. It seems clear therefore that the housing target needs to be revised upwards and the delivery of housing brought forward in the plan period to deal with both the historic under provision and the buffers required by paragraph 47 of the Framework.

The Council's Latest Five Year Supply Paper applies a 5% non-implementation rate to extant permissions, small SHLLA sites and allocated sites. A more realistic and usual rate is considered to be 10%. This would in turn further increase the housing target set out at Modification 4.

Accordingly, it is submitted that the following modifications are required to make the plan sound:

1. Additional allocations and/or increased densities on proposed allocations to deal with the identified increase needed for the housing target and allow for greater flexibility to deal with changing circumstances;

2. Bring forward the delivery of housing in the plan period to significantly boost the supply of housing sites in the first five years of the plan to deal with the historic under supply.

To this end, the land which immediately adjoins Allocation H48, south of Westham Lane is considered an excellent candidate for further allocation.

Barford is one of 3 identified Growth Villages in Warwick District not in the Green Belt. The site lies within the proposed village envelope where infill residential development will be acceptable in principle.

Like Allocations H48 and H22, the site is located away from the village's more sensitive historic core but within easy walking distance of its extensive amenities. Combined with Allocations H48 and H22, residential development on this site would form an entirely logical and natural conclusion to the western side of the settlement where it would be contained physically by the raised landform of the A429 bypass which immediately flanks the western edge of the site.

The site is some 1.17 ha and thus could accommodate up to approximately 40 dwellings at a responsive density. Vehicular access could be gained via the road infrastructure which would be delivered as part of Allocations H48 and H22 which effectively forms a continuation of Bremridge Close. The geometry of this road is more than capable of supporting a greater quantum of development than would be delivered by this parcel, and that of Allocation H48 and Allocation H22 combined.

There are no known significant features of ecological or arboricultural interest on the site. Nevertheless, it is considered that any impacts could be satisfactorily mitigated against. The size and shape of the site is such that it has low economic value as agricultural land. Its loss for agricultural purposes would therefore be clearly outweighed by the substantial benefits of boosting housing supply to address the District's needs.

Furthermore, the size of the site is such that it is available for immediate development without the need for any phasing. It will therefore play an important role in assisting the Local Planning Authority in boosting its housing supply in the short term.

For all these reasons, it is submitted that the allocation of this site would be a logical addition to the proposed plan, especially in light of the need to deliver more homes than the plan proposes in order to address:

- i) The acknowledged historic undersupply in the first 5 years of the Plan; the inevitable further unmet housing demand from Birmingham; and the need to increase housing target flexibility to a more realistic level.

- ii) Furthermore, given the site lies within the proposed settlement boundary of Barford there is little logic in a non-allocation on the basis that the principle of residential development on this site would be acceptable in any event.

Paul Harris BSc (Hons) MASP MRTPI

Principal Planner

Cerda Planning