

## Preferred Options Response Form

2012

For Official Use Only

Ref:

Rep. Ref.

Please use this form if you wish to support or object to the Preferred Options version of the new Local Plan.

**If you are commenting on multiple sections of the document you will need to complete a separate copy of 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 plan has been made available for members of the public. You can also respond online using the LDF Consultation System, visit: [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)

### Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title	MR	
First Name	GRAHAM	
Last Name	PARKER	
Job Title (where relevant)	DIRECTOR	
Organisation (where relevant)	PJ PLANNING	
Address Line 1	5 ST PAULS TERRACE	
Address Line 2	82 NORTHWOOD ST	
Address Line 3	BIRMINGHAM	
Address Line 4	B3 1TH	
Postcode		
Telephone number	07545 075942	
Email address	GRAHAM.PARKER@PJPLANNING.COM	
Would you like to be made aware of future consultations on the new Local Plan?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
About You: Gender	MALE	
Ethnic Origin	WHITE	
Age	<input type="checkbox"/> Under 16	<input type="checkbox"/> 16 - 24
	<input type="checkbox"/> 25 - 34	<input type="checkbox"/> 35 - 44
	<input type="checkbox"/> 45 - 54	<input type="checkbox"/> 55 - 64
	<input type="checkbox"/> 65+	



## Part B - Commenting on the Preferred Options

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet  of

Which document are you responding to?

e.g. Preferred Options (Booklet) Preferred Options (Full Version)

Preferred Options (Full Version)

Which part of the document are you responding to? Preferred Option Box (e.g. PO1)

PO1

Paragraph number / Heading / Subheading (if relevant)

Paragraph 5.5 et seq

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support



Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

We submit that the housing target of 600 per annum set by the Preferred Options Report (POR) will be inadequate and will lead to the Plan being found unsound. We say this for two principal reasons.

First, despite best practice and government advice, the SHMA (on which the POR is based), only covers a part of the identified Strategic Housing Management Area (see paragraph 10.6 of the SHMA). It is poor practice to project the housing needs of one part of the SHM Area in isolation from the others since the resultant internal transfers of 'need' and 'demand' within the SHM Area will be underestimated or ignored altogether and, consequently, the estimate of housing need (particularly in a popular area such as Warwick) will be significantly underestimated.

This failing of the SHMA could be overcome if the local planning authority and its neighbors were able to provide evidence that they are complying with the 'duty to co-operate' set by Section 110 of the Localism Act. Under this duty, amongst other things, local authorities should aim to be sure that *all* sources of housing need within the SHM Area have been taken account of, including any 'overspill' from neighbouring districts both within and outside the SHMA. The POR does not provide the evidence that this has been done.

Second, the POR sets an objective<sup>1</sup> of providing sustainable levels of economic growth maintaining, encouraging and creating jobs and balancing this with housing provision. This is an objective that, we believe, is almost unimpeachable. However, the option that would achieve this – option 2 – is dismissed in paragraph 5.23 for no better reason than that the local planning authority does not believe that sufficient 'strategic' sites exist to deliver it. With respect, that is putting the cart some way before the horse, since the SHLAA contains a wide range of sites - large, medium and small - that would be capable of delivering the necessary numbers in sustainable locations.

<sup>1</sup> Incidentally, there is no paragraph 4.13 – 4.15 as suggested in numerous places in the Preferred Option.

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Which part of the document are you responding to?

Preferred Option Box (e.g. PO1)

PO1

Paragraph number / Heading / Subheading (if relevant)

Paragraph 5.5 et seq

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

In other words, there is no evidence that Option 2 – which is the most sustainable of the options considered since it would significantly reduce commuting – is not achievable. Furthermore, as the SHMA itself (para 10.14) states, this aspect is a key element of the discussions that will be needed under the 'duty to co-operate'.

It follows that it is perverse not to make provision for Option 2 and that the 600 dpa 'preferred' should be regarded as the bare minimum necessary rather than a target.

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Preferred Options (Full Version)

Which part of the document are you responding to? Preferred Option Box (e.g. PO1)

Paragraph number / Heading / Subheading (if relevant)

Paragraph 5.19 – 5.23

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support



Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Para 5.19 sets out the number of dwellings 'preferred' by the local planning authority. However, equally important is that the Local Plan should demonstrate how it is to achieve a 5-year supply taking account of:

- Objectively-assessed need for the district
- Any under-supply from previous years (using the Sedgefield method, since the residual method has no place in the NPPF)
- The appropriate 5% or 20% buffer.

It is evident that this aspect is extremely important in achieving the government's objectives for the early delivery of housing, yet it is entirely absent from the Preferred Option how the local planning authority intends to achieve delivery in the crucial first 5 years.

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Which part of the document are you responding to? Preferred Option Box (e.g. PO1)

Paragraph number / Heading / Subheading (if relevant)

PO4 – Distribution of sites for housing

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support



Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

It is important that the 'plan led system' forms the basis for the local planning authority's decisions. However, it is clear from three aspects of PO4 alone that we are still some way short of that.

First, the local planning authority anticipates that some 33% of all sites will be windfalls. By any yardstick this is an extremely large proportion and is the antithesis of the plan-led system.

Second, it is important that decisions on distribution as well as overall numbers be taken on the basis of the most up to date evidence available. With that in mind, the preferred option contains no justification whatsoever either for the overall allocation of 500 homes to the Category 1 villages or for the allocation of 100 to each of them individually.

The NPPF urges local planning authorities, both in their plan-making and their decision-taking functions, to maintain a presumption in favour of sustainable development.

It is important, therefore, to ensure that Local Plan decisions are taken on the basis of achieving sustainable development. That can, frankly, only be done on a village-by village approach. The local planning authority has the necessary evidence in the SHLAA that will enable the authority to identify appropriate sites within or adjacent to each village. Some, for example, Barford, are clearly capable of accommodating more than the notional 100, whilst others may not be. However, this evidence does not seem to have figured at all in the decisions implicit in PO4.

Third, these issues are even more important since the local planning authority is proposing to take the radical step of changing Green Belt boundaries. However small these changes might be, they all need to be justified by reference to Exceptional Circumstances. It is unlikely that those circumstances will be capable of being demonstrated whilst there are other sites in sustainable locations outside Green Belt that are available but that have not been adequately explored.

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## Guidance on Making Representations

- Please use the attached response form as it will help the Council to keep accurate and consistent records of all the comments on the Plan, alternatively complete online at [www.warwickdc.gov.uk/newlocalplan](http://www.warwickdc.gov.uk/newlocalplan)
- If you wish to make comments on more than one aspect of the Plan, please use a separate copy of Part B of this form for each
- You may withdraw your objection at any time by writing to Warwick District Council, address below
- It is important that you include your name and address as anonymous forms cannot be accepted. If your address details change, please inform us in writing.
- All forms should be received by **4.45pm on Friday 27th July 2012**.
- 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.
- To return this form please drop off at one of the locations below, 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.

Location	Opening Times
<b>Warwick District Council Offices</b> Riverside House, Milverton Hill, Royal Leamington Spa	Mon – Thurs 8.45am – 5.15pm Fri 8.45am – 4.45pm
<b>Leamington Town Hall</b> Parade, Royal Leamington Spa	Mon – Thurs 8.45am – 5.15pm Fri 8.45am – 4.45pm
<b>Warwickshire Direct Whitnash</b> Whitnash Library, Franklin Road, Whitnash	Mon – Weds 10.30am – 5.00pm Thurs Closed Fri 10.30am – 4.00pm Sat 10.30am – 1.30pm
<b>Leamington Spa Library</b> The Pump Rooms, Parade, Royal Leamington Spa	Mon – Weds 9.30am – 6.00pm Thurs 10.00am – 7.00pm Fri 9.30am – 6.00pm Sat 9.30am – 4.30pm Sun 12.00am – 4.00pm
<b>Warwickshire Direct Warwick</b> Shire Hall, Market Square, Warwick	Mon to Thurs 8.00am – 5.30pm Fri 8.00am – 5.00pm Sat 9.00am – 4.00pm
<b>Warwickshire Direct Kenilworth</b> Kenilworth Library, Smalley Place, Kenilworth	Mon and Tues 9.00am – 5.30pm Wed 10.30am – 5.30pm Thurs and Fri 9.00am – 5.30pm Sat 9.00am – 1.00pm
<b>Warwickshire Direct Lillington</b> Lillington Library, Valley Road, Royal Leamington Spa	Mon 9.30am – 12.30pm & 1.30pm – 6.00pm Tues and Fri 9.30am – 12.30pm & 1.30pm – 5.30pm Weds Closed Thurs 9.30am – 12.30pm & 1.30pm – 7.00pm Sat 9.30am – 12.30pm
<b>Brunswick Healthy Living Centre</b> 98-100 Shrubland Street, Royal Leamington Spa	Mon - Thurs 9.00am – 5.00pm Fri 9.00am – 4.30pm
<b>Finham Community Library</b> Finham Green Rd, Finham, Coventry, CV3 6EP	Mon 1.00pm – 7.00pm Tues, Thurs and Fri 9.00am – 7.00pm Sat 9.00am – 4.00pm

Warwick District Council strives to ensure that all people regardless of ethnic origin or disability can access its services. Where possible, information can be made available in other formats, including large print, cassette tape, CD & other languages if required. Telephone 01926 450000.