

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

Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		Mr
First Name		Alasdair
Last Name		Jones
Job Title (where relevant)		Director of Planning
Organisation (where relevant)		Marrons
Address Line 1		1 Meridian South
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Address Line 3		Leicester
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Telephone number		0116 289 2200
Email address		alasdairjones@marrons.net
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		
Ethnic Origin		
Age	<input type="checkbox"/> Under 16	<input type="checkbox"/> 16 - 24
	<input type="checkbox"/> 45 - 54	<input type="checkbox"/> 55 - 64
		<input type="checkbox"/> 25 - 34
		<input type="checkbox"/> 35 - 44
		<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 Preferred Level of Growth

Paragraph number / Heading / Subheading (if relevant)

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).

Please see attached sheet.

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PO1 Preferred Level of Growth

We have a number of concerns about the proposed level of housing provision, which are set out below.

a. The Relationship between Housing and Employment Growth

- i. A summary of the projections used to inform Policy PO1 is set out at Figures 2.21 and 2.22 of the Strategic Housing Market Assessment (March 2012) (SHMA). Three of the thirteen (13) projections set out in the SHMA are summarised in Table 5.1 of the Plan. Each of these are at the upper end of the range that can be identified from the thirteen projections, which extend from 191 dwellings per annum (PROJ6) to 800 dwellings per annum (PRJOJ13).
- ii. The three projections “considered to be worthy of further consideration” and as referred to in Table 5.1 are as follows:

Projection 1. (PROJ1 of Fig 2.21/22.) Trend based and assuming continued in migration of 400 persons per annum. The resulting housing requirement is 596 dwellings per annum or 11,921 dwellings 2011 – 2031.

Projection 2. (PROJ7 of Fig 2.21/22.) Projected employment growth of 11,860 jobs. Within this projection migration levels are adjusted so that the growth in the labour supply matches the growth in the demand for labour (jobs). The resulting housing requirement is 716 dwellings per annum or 14,310 dwellings 2011 - 2031. The demand for new housing could be adjusted downwards by increasing levels of in-commuting.

Projection 3. (PROJ8 of Fig 2.21/22.) Projected labour force growth derived from a population growth of 17,070 persons. Taking account of existing commuting dynamics, this results in a growth in jobs of 7,895 jobs. The resulting housing requirement is 569 dwellings per annum or 11,376 dwellings 2011 – 2031.

- iii. Projection 3 is not considered appropriate, because the increase in jobs (11,860 see Projection 2) is not matched by an increase in homes. Projections 1 and 2 were considered the more appropriate basis for estimating growth in the District.
- iv. Policy PO1, however, is based on the provision of 600 homes per annum. To balance homes and jobs would require 716 homes per annum. In order to support the forecast of 11,860 jobs there will need to be an increase in in-commuting to the District from adjoining areas to provide the necessary labour force.
- v. If the housing policy remains at 600 dwellings per annum, then the economic growth of the District will require the provision of some additional homes (about 116 dwellings per annum, i.e. $716 - 600 = 116$), in those Districts, which presently show commuter flows into Warwick.

b. **Evidence of the Co-operation with Neighbouring Authorities**

- (i) If the broad strategic objectives of the plan are to “facilitate the growth and development of the local economy” (see para 2.5), maintain high levels of employment and to balance housing growth with employment growth, then the plan should make provision for the development of 716 dwellings per annum or 12,888 dwellings over the plan period 2011 – 2029. Development at this scale would not be reliant on adjoining authorities acting as “hosts” to growing numbers of in-commuters to the District over the plan period so that the growth I employment opportunities can be realised.
- (ii) In the alternative, should the Local Plan be progressed on the basis of providing 600 new homes per annum or 10,800 dwellings over the plan period, then some of the housing to “match the growth in employment”, will be provided outside the District. However, that assumption must be supported by evidence to indicate that the local authorities who “host” the anticipated growth in the number of in-commuters to Warwick are content to provide land for the necessary number of new homes. For the plan to be sound and in conformity with the advice in the NPPF at paragraphs 178 – 181 it cannot be appropriate to rely on the intention set out in paragraph 5.12 of the plan, which states that:

“The Council will, however, be consulting neighbouring authorities on its proposals.”

For the plans proposals to move forward on the basis of completing 600 dwellings per annum it must demonstrate how and where some 116 homes per annum (716 – 600) are to be constructed. It will be wholly inappropriate to progress the plan to submission stage without evidence that this issue has been resolved on the basis of an agreement at sub-regional level.

- (iii) Notwithstanding the observation at (ii) above, Policy PO3 and Tables 7.1 and 7.2 note that the plan will provide for “allocations” totalling 8,360 dwellings; some 1,374 dwellings or 76 dwellings per annum more than the required scale of new housing to be provided on allocated sites (see Table 7.1). These planned allocations together with the addition of some further suitable SHLAA sites could, in our view, meet the higher level of provision required to achieve the balance between housing and employment.

c. **Concluding Comment**

Accordingly, we would advise that Policy PO1 be amended to a total of 12,800 dwellings; about 2,000 further homes over the plan period. This would secure the provision of new housing commensurate with the forecast level of new jobs and would not rely on adjoining authorities acting as “host” to a growing number of in-commuters to the District.

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
- 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

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 and at the following locations.

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