

# Part B - Commenting on the Revised Development Strategy

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

Sheet  of

Which part of the document are you responding to?

REVISED DEVELOPMENT STRATEGY

Paragraph number / Heading / Subheading (if relevant)

RDS2 + RELATED PARAGRAPHS

Map (e.g. Proposed Development Sites – District Wide)

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).

SEE ATTACHED NOTE SH2

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Ref:

Rep. Ref.



# Note SH2 - Representations relating to RDS2 and related paragraphs

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## 1 THE STRATEGY

1.1 Section 4.1 sets out the process by which the Strategy provides for 12,300 dwellings for the plan period 2011-2029.

1.2 RDS2 sets out how this is requirement to be achieved:

“Sites completed between 2011 and 2013	447
Sites with outstanding planning permission at 1 April 2013	1,681
Small urban SHLAA sites which are assessed as being potentially suitable	300
An allowance for windfall sites coming forward in the plan period	2,800
Consolidation of existing employment areas	450
Sites allocated in this Plan	6,622
<b>Total</b>	<b>12,300”</b>

## 2 NATIONAL POLICY FRAMEWORK

2.1 Paragraph 47 of the NPPF sets out the government’s requirement for local authorities’ planning policies:

“47. To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, ...”

## 3 SUBMISSION

3.1 We submit that the process for assessing the housing target is deeply flawed and that the housing target set by the draft Strategy in 4.1.10 and RDS2 will therefore be inadequate and will lead to the Plan being found unsound. We say this for a number of reasons that we set out below in more detail. We set out many of these reasons in more detail in our representation to the Preferred Options Report in 2012.

3.2 First, despite best practice and government advice, the SHMA only covers a part of the identified Strategic Housing Management Area (see paragraph 10.6 of the SHMA). Thus it does not assess the “full, objectively assessed needs for market and affordable housing in the housing market area” as required by paragraph 47 of the NPPF and ignores the duty to cooperate imposed on this Local Plan by Section 110 of the Localism Act 2011.

3.3 Second, the Strategy is based on out of date household and population projections. The reference to the 2011 ONS Projections in paragraph 4.1.5 is cursory and the implications of these projections clearly have not been absorbed into the strategy.

3.4 Third, housing needs are based on much more than simple household projections, as is set out in the SHMA itself.

3.5 Fourth, the SHMA itself makes massive assumptions about in-commuting, which have significant implications both for Warwick and for nearby authorities. These assumptions are unsupported by evidence.

3.6 Fifth, although the absence of a 5 year supply of deliverable housing land would not, in itself, render the plan ‘unsound’ the Inspector will clearly have in mind that it is sensible to ensure that the plan begins on a firm footing, which this Strategy does not. In addition to underestimating the district’s overall housing needs throughout the plan period, no account has been taken of the undersupply from the previous period . Thus:



- Even with the lower WMRSP2 requirement of 550 dpa, given the shortfall from the previous period and the fact that Warwick is certainly a 20% buffer authority, the requirement in the first 5 years is likely to be some 900 dpa.
- If one takes the Strategy's interim assumption of 680 dpa for the whole plan period, the requirement in the first 5 years is likely to be in the order of 1100 dpa, and this is still without using a proper analysis of need, or an up to date assessment.

3.7 As it stands, the Strategy is clearly incapable of providing sufficient deliverable sites in the first five years of the plan period.

#### **4 CONCLUSION**

4.1 Until all of these matters are demonstrated, the Strategy is unsound in all four of the required ways set out in the NPPF:

- It is not based on objectively-assessed development requirements, including unmet requirements from either neighbouring authorities or shortfalls of delivery in recent years. It is not, therefore '**positively prepared**'.
- It has not been demonstrated to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. It is not, therefore, '**justified**'.
- It is not demonstrated to be deliverable and is not based on effective joint working on cross-boundary strategic priorities. It is not, therefore, '**effective**'.
- It does not enable the delivery of sustainable development in accordance with the policies in the Framework – in this case, specifically, sustainable development and Green Belt policies. It is not, therefore, consistent with national policy

4.2 On the basis of the above, we place on the record our strong objection to the level of housing (12,300) said to be required in the plan period. This is, we believe, likely to be a severe underestimate and, if pursued, the plan would be materially unsound. We also put on record our strong objection to the lack of suitable, sustainable and deliverable land proposed to meet even this severely under-estimated need, meaning that there is in fact no plan to meet their need, making the plan further materially unsound.

4.3 However, we note that the local planning authority itself only refers to this as an 'Interim' conclusion and that it will be revised following a re-evaluation of the housing requirements taking into account the latest ONS projections and the S110 duty to co-operate.

4.4 Whilst this is a welcome change of approach by the authority, we wonder why the authority did not heed the warnings given at the earlier Preferred Option stage (specifically about the faults in the SHMA, and the duty to co-operate) rather than waiting for the Coventry Inspector's instruction.

4.5 Indeed, we wonder why this Strategy has been published in its current form at all. Amendments to the housing requirement, whether up or down, will have significant implications for the location of development and particularly for Green Belt. It would surely have been better, and less confusing for members of the public, to get the evidence base correct in the first place.

4.6 Having said that we do welcome the local planning authority's commitment to correct the process and the evidence base and look forward to amendments that take on board the five issues set out above.

**Graham Parker**

**July 2013**