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By Email

22034/A3/RC/KV

29th July 2013

Dear Mr. Barber,

REPRESENTATIONS TO WARWICK DISTRICT COUNCIL REVISED DEVELOPMENT STRATEGY – JULY 2013

We write on behalf of Taylor Wimpey UK Ltd in respect of their land interests at land at Brembridge Close, Barford as per the attached Location Plan.

The site has recently been discussed with the Council as part of pre-application discussions on land at Wellesbourne Road, Barford and has been submitted to the SHLAA for consideration. The Site is capable of delivering approximately 11 dwellings and we are confident that the site is suitable, available and achievable. It is capable of meeting a small part of Barford's wider needs and would complement the significant provision that the Wellesborune Road site can deliver.

We respond to the respective policy areas and chapters below of the Revised Growth Strategy document:

Plan Period
The draft document refers to a 15 year plan period however the plan commencement and end dates of 2011 – 2029 are 18 years apart and the Council should clarify the plan period.

Duty to co-operate
The Localism Act and Paragraphs 17, 157 and 178 of the National Planning Policy Framework (NPPF) require neighbouring authorities to work in a joint manner and co-operate in order to address planning issues which cross administrative boundaries or on matters that are larger than local issues. Indeed under Paragraph 181 of the NPPF, Local Authorities are required to demonstrate evidence of having co-operated effectively when their local plans are submitted for examination.

Whilst it is acknowledged that the Council is working closely with the other authorities (Coventry, Warwick, Nuneaton & Bedworth and Rugby) in its Strategic Housing Market Area (SHMA) as identified in Paragraph 4.1.1, when the Warwick New Local Plan DPD is submitted for examination, the Council will have to demonstrate co-operation within the wider context of neighbouring authorities. Significantly it is considered that this will include an assessment of the joint working

with Solihull and Stratford upon Avon Councils who are not involved in the production of the joint-SHMA.

It is noted that following the revocation of West Midlands RSS (WMRSS) on 20th May 2013, there has been a significant drop in the total level of housing provision being promoted by local authorities across the West Midlands. The WMRSS was based on a strategy to deliver significant growth within the Metropolitan Urban Areas (MUA) and therefore provide for the vast majority of projected households over the Plan period. With the loss of the guidance at the Regional level it is noted that this approach is being undermined and recent research by the HBF shows that in total all the adopted and emerging plans for the West Midlands will only provide for 17,085 homes per year compared to the previous target of 19,795 per annum.

There is currently a high-level of uncertainty in neighbouring authorities over the level of housing provision required to meet objectively assessed needs for both market and affordable housing as set out in the NPPF.

Rugby Borough Council adopted its Core Strategy in 2011 based on the requirements in the WMRSS housing figure of 540 dwellings per annum.

Stratford upon Avon District Council is in the early stages of its plan preparation with a draft plan proposing a housing figure aligned with the revoked WMRSS dwelling number but substantially below the identified housing need.

Solihull Metropolitan Borough Council is consulting on the Proposed Modifications to its Local Plan following on from the Examination. The Plan proposes 11,000 new dwellings (2006-2028) as recommended in the revoked WMRSS. Nevertheless, in his Interim Conclusions Report dated 5th April 2013 the Planning Inspector, Stephen Pratt, wrote "*16. The Council recognises that the SHMA will need to be reviewed soon, to take account of more recent household projections and the needs of the wider housing market, and ensure that the plan is up to date, as envisaged in the NPPF (Paragraph 158). The supporting evidence confirms that the SHMA will be reviewed and up dated in 2014, and the results may require the plan itself to be reviewed. This review will also need to update and review the original objective assessment of housing requirements undertaken for the WMRSS Phase 2 Review insofar as it relates to the relevant housing market area. The firm commitment and need to undertake this review should be confirmed in the Local Plan.*" It continued "*18. However, this assessment is now becoming dated, and in order to ensure that the housing provision figure is robust, enduring and up-to-date, there should be a firm commitment in the plan to review and up date the objective assessment of housing requirements. This should take account of not only Solihull's future housing needs, but also the needs of the wider housing market, including the needs of Birmingham City, if this becomes necessary as a result of the sub-regional work already envisaged and planned*".

On 16th April 2013, the Coventry City Council Core Strategy was withdrawn after the Council failed to satisfactorily comply with its Duty to Co-operate under Section 33(A) of the Planning & Compulsory Purchase Act 2004 as amended by Section 110 of the Localism Act 2011. The plan proposed a significant reduction in the total housing requirement from 33,500 in the previous Core Strategy to 11,373 dwellings. As part of the Annex to the Preliminary Hearing Session on the Coventry City Council Core Strategy DPD Examination, the Inspector, Robert Yuille wrote "*47. It cannot, therefore, be established that the needs of the housing market area have been considered in the round. 48. However, as far as the Coventry housing market area is concerned, the significance of this Statement of Common Ground (SOCG) is undermined by the absence of a joint SHMA – a crucial piece of evidence in understanding the housing needs of the area – and uncertainty as to whether individual SHMAs have used broadly consistent methodologies and assumptions. 49. This in turn undermines the statement, insofar as it relates to the Coventry housing market area, that each council can meet its own housing need within its own area. Finally the mechanism for dealing with any shortfall, should one arise is no more than an agreement to seek to agree in the future. 50. These factors significantly reduce the overall substance of the SOCG in as far as it relates to the*

Coventry housing market area. I share the view expressed by Nuneaton & Bedworth Borough Council that while the SOCG identifies matters of cross boundary interest it does not resolve them".

The Warwick District Council Revised Growth Strategy document states in paragraphs 1.3 and 4.1.1 that it is awaiting the outcome of a new SHMA. It is important to note that, despite its neighbouring authorities having not drawn attention to any matters of a strategic nature, such strategic pressures do still exist. If any neighbouring authorities are not adequately meeting their own assessed housing needs then it is anticipated that these housing pressures could impinge upon Warwick District Council. We therefore request that any SHMA publication and associated amendments to the development strategy are consulted upon in full to enable a suitably robust consultation strategy and record of engagement with neighbouring authorities.

Amount of housing

In terms of section 4.1 and the overall housing requirement for the District, it is not considered appropriate to comment fully on this matter until the results of the joint-SHMA are available, which is expected to be in late 2013. As is stated in paragraph 4.1.1 of the document, the figure of 12,300 dwellings *'may be revised pending the findings of the Joint SHMA'.*

It is noted that the figure of 12,300 dwellings is explained in Paragraph 4.1.10; and it is based upon the latest ONS projections of 11,500 plus a local growth rate of 2.4%. However Paragraph 4.1.6 indicates a potential growth of between 11,300 – 14,300 dwellings over the period 2011 - 28 as modelled by G L Hearn in the SHMA 2012 and Paragraph 4.1.8 suggests a total need of 13,300 – 13,800 dwellings taken from the Economic and Demographic Forecasts Study (December 2012).

There are widespread concerns with an over reliance on the 2011-based interim household projections, which suggest only an average need of 624 new households per annum 2011 – 2021. These results are heavily influenced by a period of sharp economic recession and the Council should not use these figures to justify a low housing requirement that fails to meet needs during a different economic period and following a time of volatility in the housing market. These matters are set out in more detail in the Cambridge Centre for Housing & Planning Research (CCHPR) report 'Choice of Assumptions in Forecasting Housing Requirements Methodological Notes' dated March 2013.

The guidance from the Government in the NPPF in terms of housing delivery is part of a broad pro-growth strategy that the coalition Government has implemented and continues to support. The NPPF itself states that, *'significant weight should be placed on the need to support economic growth through the planning system'* (Para. 19, NPPF) and this should not be ignored.

In addition, the Council should give weight to documents and statements such as 'Laying the Foundations: A Housing Strategy for England' (November 2011), the 'Get Britain Building' fund (December 2011) and 'Housing and Growth' (September 2012). All of these documents highlight the significant role that residential development can have in assisting with the economic recovery of the Country. Warwick District, by embracing this pro-growth strategy, can make a valuable contribution to the economic recovery of the region and the Country as a whole.

Housing supply

Paragraph 47 of the NPPF emphasises that local planning authorities should continue to demonstrate a 5 year housing land supply, which is to be supplemented by an additional buffer of either 5% or 20% to ensure choice and competition in the land. Paragraph 49 of the NPPF continues *"relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites".*

It is known from the Council's July 2013 five-year supply document and the Revised Growth Strategy that Warwick DC cannot demonstrate a five-year supply of deliverable housing.

As stated in the Inspectors letter for the Erewash Core Strategy Public Examination dated 23rd May 2013 written by Mr Mike Moore *"The National Planning Policy Framework seeks to boost significantly the supply of housing (Para 47). Local planning authorities should identify and update annually a*

supply of specific, deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer which, as the Council concludes that there has been a record of persistent under delivery, in this case should be 20%. Relevant policies for the supply of housing will not be considered up to date if the local planning authority cannot demonstrate a 5-year supply of deliverable housing sites (Framework Para 49). As such, if the CS is not to be out of date on adoption in this regard then it is important that the land supply requirement is achieved. If there were not reasonable certainty that this would be the case then the plan would not be sound as it would be neither effective nor consistent with national policy."

Without a five year housing land supply, the Council should aim to identify and release more development land in a range of locations or formulate a deliverable strategy that will provide for housing needs across the Plan period. The local plan needs to demonstrate maximum flexibility to ensure delivery of an objectively assessed housing need in accordance with NPPF. As part of this the Council the provision of 5% or 20% buffer in its land supply must be addressed to be compliant with Paragraph 47 of the NPPF.

Distribution of growth

We support the intention to focus development on the edge of existing urban areas so as to deliver the most sustainable strategy for the District. However, we consider that in order to plan for sustainable and achievable growth within the District over the Plan period it is essential to apportion a sufficient level of growth to sustainable settlements within the District.

Barford is recognised as a sustainable settlement and is included as a 'Secondary Service Village' with a requirement to deliver 70-90 dwellings over the Plan period. It is not clear from the document what evidence base has informed the specific housing requirements apportioned per settlement, however, it is considered that a higher level of growth should be planned for Barford to take account of its sustainability.

Significantly the final level of housing agreed across the District may also impact on the need to provide extra residential growth in sustainable locations such as Barford.

The Site is capable of delivering approximately 12 dwellings and smaller sites of this nature should be used to complement the delivery of more significant sites such as Wellesbourne Road, Barford. It is considered that the larger sites will provide the Council with significant confidence in their ability to meet local needs, however, the addition of a selection on smaller sites will add variety to the local housing offer and provide increased options for future residents.

We would be grateful if you could inform us of all future consultation events for the New Local Plan, and any other relevant documents that the Council produce as part of the process. In the meantime, if you require any further information or wish to discuss the above in greater detail, then please do not hesitate to contact me.

Yours sincerely,

[redacted]

KATHRYN VENTHAM
Partner

cc Sarah Milward - Taylor Wimpey UK Ltd