



## Publication Draft Representation Form 2014

For Official Use Only	
Person ID:	4687
Rep ID:	

This consultation stage is a formal process and represents the last opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) before it is submitted to the Secretary of State. All comments made at this stage of the process are required to follow certain guidelines as set out in the **Representation Form Guidance Notes** available separately. In particular the notes explain what is meant by legal compliance and the 'tests of soundness'.

This form has two parts:

- Part A – Personal Details
- Part B – Your Representations

**If you are commenting on multiple sections of the document, you will need to complete a separate Part B of this form for each representation on each policy.**

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 (see the table below). You can also respond online using the Council's e-Consultation System, visit: [www.warwickdc.gov.uk/newlocalplan](http://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 received by **4.45pm on Friday 27 June 2014**

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](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:

**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

**Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.**

# 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

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Address Line 2

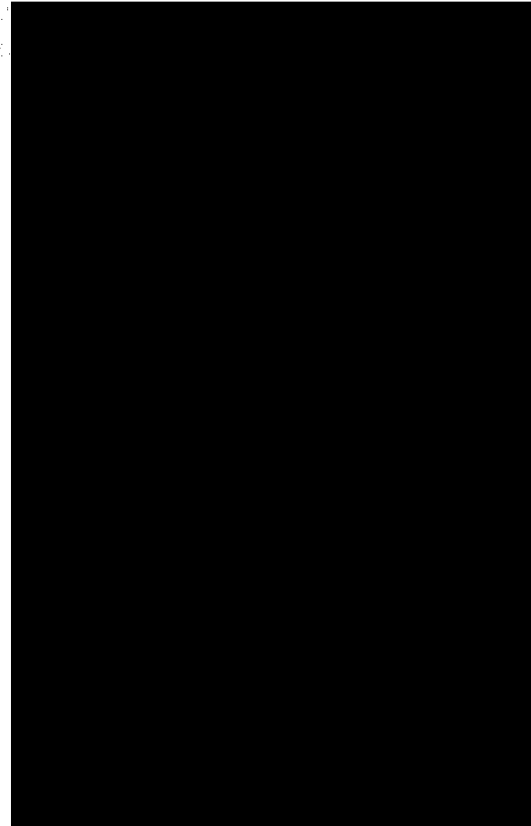
Address Line 3

Address Line 4

Postcode

Telephone number

Email address



## 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 Local Plan for independent examination

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

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# Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

## 4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA: *Local Plan*  
Paragraph Number:  
Policy Number: *DS 2, ~~DS 2.5~~, DS 6*  
Policies Map Number:

## 5. Do you consider the Local Plan is :

- |   |     |  |
|---|-----|--|
| 5.1 Legally Compliant?                    | Yes | No                                     |
| 5.2 Complies with the Duty to Co-operate? | Yes | No                                     |
| 5.3 Sound?                                | Yes | No <input checked="" type="checkbox"/> |

## 6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Please see attached 3 sheets of paper, all signed.

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan 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.

Please see attached page, signed

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 modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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## LOCAL PLAN RESPONSE

### Section 7

**DS2 & 2.5 Objectively assessed housing need**

**DS6 & 2.20 Level of Housing Growth & Ref. Joint SHMA**

Over the Plan period the Joint SHMA was based on ONS 2011 projections which showed a population growth in Warwick District of 21,474 over the Plan period to 2029 (average 1,193 a year.) These figures are now out of date.

The latest 2012 ONS local projections, published in May 2014 and including the benefit of real 2011 census figures, indicate population growth in the district, over the same period, of 15,313 (average 850 a year.). This is 28.7% lower growth rate than that used as a basis for the Draft Plan.

Projections of growth rates for most neighbouring District authorities over the Plan period are similarly much reduced using the most up to date ONS figures.

There is, however, one neighbouring authority – Coventry – which shows a striking difference from these trend projections of the 2012 ONS figures. Why is Coventry alone now projected to grow at a much greater rate?

WDC has argued that an error in projecting population growth in Warwick is of relatively minor importance if it is off-set by an error of similar magnitude but of opposite sign elsewhere in the sub-region. This argument is questionable because building homes in the wrong place leads to losses to society (for example, due to increased commuting) even if the right number of homes in aggregate is built.

Nevertheless, taking this argument at its face value, it may be argued that the reduction in projected population growth in Warwick is off-set by the increase in projected population growth in Coventry that is revealed in the same ONS projections. For Coventry, the Joint SHMA projected population growth averaging 2,438 per year, whereas the latest ONS data projects 4,040 per year.

In absolute terms this is of course a much larger increase than the reduction of 343 in Warwick's predicted annual growth. However, as the Joint SHMA noted, projections of population growth for Coventry are highly uncertain. The main source of growth is net inward migration from abroad, which has been highly volatile in recent years. The projected population growth of 4,040 per year is almost exactly equal to the net inward migration projected by the ONS of 4,280 per year which is 1.2% of the 2013 population. The corresponding figure for England is 0.28% and for comparable cities such as Birmingham and Leicester is 0.4%. The estimated 1.2% rate of Coventry migration is therefore implausibly large. Unless some explanation can be found for Coventry's projected net immigration from abroad being three times as large, relative to population, as Birmingham's and Leicester's, these projections should not be used to justify building homes in Warwick.

#### **Housing needs arising from ONS 2012 projections**

Projection of population figures is evidently not a precise science. But the best basis available for the Plan is the most up to date ONS projection for Warwick District. The NPPF requires an objective assessment of need in full – not an under supply nor an oversupply – and that is what the Joint SHMA attempted. However the 2012 based ONS projections, including real information from the 2011 census, clearly demonstrate that the Warwick District Draft Plan is not soundly based.

The Draft was based on a 2029 District population reaching	156,150
The latest ONS figures project a 2029 population of	149,991
The mid 2011 estimate of population in Warwick District was	134,678

(These figures all exclude communal establishments)



## POPULATION GROWTH during the Plan period :-

Assumed by the Joint SHMA (Proj 1A)	was	21,472
Projected by the ONS 2012 figures	is	15,313

### Household Size

The calculation of need for additional homes is extremely sensitive to assumptions of average household size. To house an increased population of 15,313 would require the following numbers of new dwellings, depending on the average household size in the District :-

	<u>Household Size</u>	<u>Extra Dwellings</u>
2001 Household size (census)	2.245	8,132
2011 “ “ (census)	2.295	6,672
2029 Plan Assumption	2.181	10,100

There are varied arguments on household size, with conflicting possible trends, and no very clear or certain outcome. The Draft Plan has assumed a substantially reduced average household size, although that trend was not supported in the actual figures provided by the 2001 & 2011 census.

What plainly emerges is that the Plan's DS6 figure of 12,860 extra homes is excessive by a large margin. Based on the latest ONS projection and even accepting the Plan's own household size of 2.181 the Plan proposal is at least 2,760 more dwellings than are needed. Using actual current census based figures for household size, the Draft Plan is even further adrift

### Allocated Housing Sites

DS10 & DS11 allocate housing sites on the basis of an alleged total need for housing which is shown (above) to be unsound.

Much of this allocation is on green field sites to the south of Warwick and Leamington. The consequence for transport and other infrastructure are severe, damaging and expensive (see below).

This allocation arises from an attempt to provide a very large number of new houses in a District which comprises some 80% green belt land – mainly north of Warwick & Leamington.

Since well over 2000 houses allocated in the Draft are demonstrably in excess of projected need the allocation of sites is rendered unsound both in quantity and location. A large proportion of housing need can in fact be filled on brownfield sites as a priority – as preferred by the NPPF.

### Sustainable Lifestyle / Sustainable Communities

At various points, the Draft repeats an aspiration for sustainable lifestyles :-

- DS3 (e) a low carbon economy and lifestyles and environmental sustainability
- DS5 Presumption in favour of Sustainable Development
- P. 79 HO Housing (b) locations which enable sustainable lifestyles
- BE1 (j) Convenient , safe & integrated cycling and walking routes . . .
  - and for public transport.
- 5.9 “Keen to encourage” . . .environment
- TR1 Access and choice . . .
- TR2 Traffic generation & Air Quality
- HS1 (d)(e) Walking & cycling
- HS6 (b) Creating Healthy Communities (b)

The repetition of aspirations and good intentions are perhaps an attempt to tick boxes in relation to

environmental sustainability. But to satisfy the NPPF, a Plan needs to demonstrate achievable policies and not just words of hope or aspiration for sustainable lifestyles. The draft fails to set effective priorities and policies to this end. On the contrary, the plan prescribes low density suburban sprawl on a large scale - which will be overwhelmingly dependent on motor cars and will by its very layout discourage alternative forms of transport – whether by bus, cycling or walking.

It is also notable that new households - dependent on multiple possession of motor cars for daily needs - will be put under substantial financial stress. This is not a sustainable option in economic terms as well as environmentally and is a direct consequence of an unsound strategy for the layout of new communities.

The draft gives a nod to walking and cycling but fails to spell out practical policies to facilitate these choices. Widened and ever busier road networks (see below) will intimidate and discourage pedestrians and cyclists. The proposed low density suburbs do not provide a sound basis to enable operation of an effective bus service as a genuine and convenient alternative mode of transport.

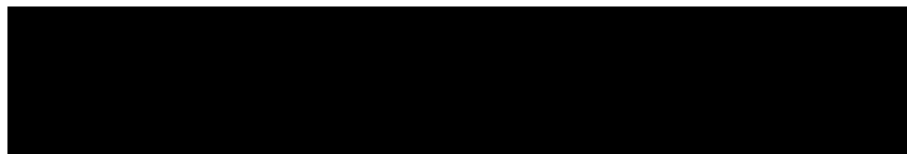
### **Infrastructure**

The Draft Plan is not backed by clearly developed and properly costed infrastructure proposals.

The few pages tacked onto the back of the Plan are replete with phrases expressing hopes and wishes, not firm commitments. (eg *Draft Infrastructure Delivery Plan*, p.1,1.2 & 1.3)

The proposed new suburbs clearly present a severe challenge in terms of transport. There is great reliance on simply widening roads and up grading junction capacity to mitigate increasing traffic congestion. Large sums are suggested for road works to prevent total gridlock. But the consequences for the streets of Warwick & Leamington town centres– especially the worsening air quality and health outcomes – have not been adequately addressed.

There are no significant policy proposals, and only a tiny proportion of budget, allocated to genuine choice so as to facilitate alternative and lower carbon modes of transport. This is a failure to meet the policy guidelines of the NPPF.



## Section 8

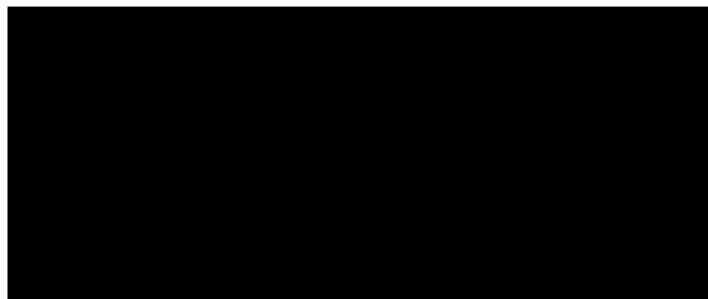
Recognise the 2012 ONS projections of population growth for Warwick District and re-calibrate the housing needs accordingly.

Given the uncertainty about future trends in average household size, the Leamington Society is of the view that a sound Plan should propose a housing target somewhere between the figures of 10,100 and 6,672 set out above (“Household Size”).

Based on the new, lower housing needs, review the planned allocation of new housing sites. As much of both the employment growth and the population growth in the region is predicted to occur in Coventry, building houses in Whitnash and south of Warwick must increase commuting and traffic problems in and around the town centres of Warwick and Leamington Spa. It would be more sustainable to build houses near the anticipated new centres of employment.

Various advantages follow from WDC adopting this course:-

- Most of the new houses could be built in brownfield sites at urban densities
- The Council can prioritise its need for affordable housing, social housing and starter homes with 1-3 bedrooms.
- WDC would meet the requirement for a five year supply of housing land.
- Expensive and non-sustainable infrastructure (widened roads and new junctions) would be largely avoided.
- There would be less air pollution from cars because people living in or close to town centres are able to use public transport and/or walk or cycle to jobs, schools, shops, etc.



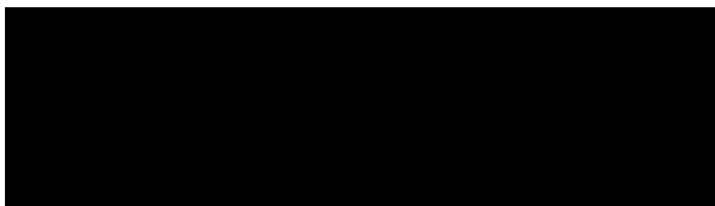


### Section 10

The basis for compiling the Joint SHMA and the ONS methodology in its population projections are complex and technical matters. Professionals in our membership have applied time and expertise to understand and analyse the processes which underlie this critical evidence base. We believe their work is at least on a par with that undertaken by WDC planning officers and their consultants. We have previously submitted significant analysis of this during the Plan consultation procedures. Since WDC has taken a decision to submit a Draft Plan – without modification or any apparent recognition of the new ONS projections – this is likely to be a contested issue. We therefore believe it essential that we can make oral representation to consider these issues with the Inspector.

If the Inspector is prepared to consider the existing Draft Plan in spite of the new ONS evidence, the necessary adjustments to housing numbers will give rise to substantial changes to the whole plan particularly in the appropriate allocation of housing sites and the appropriate supporting infrastructure.

Having made considerable representations, at all stages in development of the Plan to date, the Leamington Society wishes to contribute to the discussion of such changes.



9. If your representation is seeking a modification, 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:

Please see attached page, signed

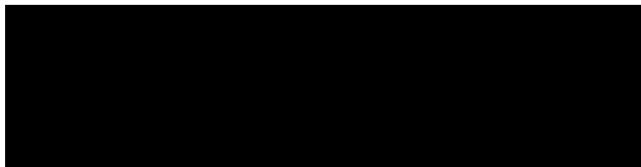
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Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish 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:



25<sup>th</sup> June 2014

Date :

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.

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