

Publication Draft Representation Form 2014

For Official Use Only
Person ID:
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

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


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:

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)
Title	Mr	
First Name	Richard	
Last Name	Brooke	
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
The adoption of the Local Plan.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

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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:

Paragraph Number:

Policy Number:

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

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:

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On 23 April 2014, I voted against the WDC Submission Draft Local Plan. In my view, it does not pass the test of soundness. In particular, having studied the evidence, I do not believe the plan, particularly the core strategic policies DS6 – DS11, are justified; and I do not believe the plan is consistent with the National Policy, particularly the NPPF’s ‘golden thread’ of sustainable development.

Shortly after publication of WDC’s Draft Local Plan, on 29 May 2014, the ONS published the latest projections for population growth. This projects a population change over the plan period 2011-29 is 15300. This is a substantial difference to the GLHearn Joint SHMA (JSHMA) report which shows at Table 50 under PROJ1A a projection of 23800 from 2011-31. Pro rata the JSHMA is 21400 over the 2011-2029 plan period. The JSHMA appears to have over-forecast by 40% of the latest (29 May 2014) ONS projections.

The JSHMA compounds this error by using a Household Headship Ratio (HHR) based upon trend data, without reflecting on the implications of this when compared to the Affordable and Market Housing mixes as shown elsewhere in the JSHMA at Tables 79 and 80. The last row of Table 50 of the JSHMA reveals an HHR of 1.66 people per new dwelling. However, for this to be realistic, it would require that either a) all of the new Market Housing would be occupied each by an average of 1 person, or b) that the affordable housing is under-occupied compared to the market housing – which is surely unlikely in the context of the Government’s abolition of the Spare Bedroom Subsidy. The table below shows that 2.0 is a realistic HHR for new dwellings.

	40%		proportion	av. pph		
Affordable	40%	1-bed	35%	1.0	0.14	
	40%	2-bed	30%	2.5	0.30	
	40%	3-bed	30%	3.5	0.42	
	40%	4+bed	5%	4.5	0.09	
Market	60%	1-bed	10%	1.0	0.06	
	60%	2-bed	30%	1.5	0.27	
	60%	3-bed	40%	2.0	0.48	
	60%	4+bed	20%	3.0	0.36	
				TOTAL	2.12	pph

In terms of the JSHMA, this means that either the HHR are too low for the new dwellings, or that the proposed mix of new dwellings should be skewed more towards 1-bed or 2-bed dwellings – from the JSHMA’s 50% 1- & 2-bed towards over 70%.

The latest ONS population projections (15400) and a realistic HHR of 2.0 yield a Level of Housing Growth of 7700 over the 2011-29 plan period. Even at the JSHMA HHR of 1.66, the level of Housing Growth is 9300. Both of these are far from the level of growth suggested in policy DS6.

Modification: Policy DS6 to read “The Council will provide for 9000 homes”.

Modification: Policy DS7, penultimate line to read “Sites Allocated in this plan 2238”.

Modification: Policy DS10, replace Greenfield Site allocations with “Greenfield sites on edge of Warwick, Leamington, Whitnash and Kenilworth 145”

Modification: Policy DS11, remove all Greenfield Sites except Red House Farm, Lillington



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:

To present evidence that shows the policy needs to be modified.

Continue on a separate sheet if necessary

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:

[Redacted signature]

Date:

27 June 2014

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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