



Representation on Warwick District Local Plan:

Where the local plan falls down on population and housing projections.

Population projections are at the heart of the decisions on what form our district will take in the future and so they are fundamental to the plan. Projections produced by GL Hearn provide the basis for the predictions of housing need and are set out in the Strategic Housing Market Assessment for Coventry and Warwickshire. Since the publication by the ONS of the latest population figures on 29th May 2014 it is clear that the estimates the plan has been based on are discredited.

Based on the new ONS figures for mid 2012, population projections for an 18 year plan are much lower with population growth of 15,313 rather than 21,472, a fall of 6,159 persons or 28.7% reduction. This is very significant since it changes the number of dwellings that will be necessary, the amount of infrastructure needed to support the increase in population, reduces the greenfield needed to be taken for housing and improves the 5 year housing land supply position.

Of equal significance in influencing housing needs is the rate of occupancy of both our new and existing houses. The Joint SHMA, incomprehensibly, predicts significantly lower occupancy rates than appear to be justified by the statistics.

They suggest occupancy rates will reduce by 2029 to 2.181 from the 2011 census density of 2.294 when, between 2001 and 2011 censuses, rates rose from 2.245 to 2.294 persons/household. ie., plus 0.049 in 10 years - suggesting that household sizes are rising, not falling. We can see no reason for a fall from 2.294 to 2.180 over 18 years and no evidence has been given that this will happen. We are also of the view that occupancy rates in future will continue to depend on the numbers of rooms and bedrooms in properties, particularly in the new development areas.

It is our view, therefore, that the SHMA underestimates the future housing occupancy rate in the district and as very small changes in household density can make a big difference, the housing needs for the district should be revised taking into account these two significant factors.

This research, undertaken locally by campaign groups advised by respected University of Warwick economists, shows conclusively that maintaining a housing target of 12900 by 2028 cannot be justified on the basis of the latest figures. A decision to continue to work towards this target can only be based on the leadership of Warwick District Council being determined to "go for growth" in the face of the community's expressed wish for a plan that would do no more nor less than meet the needs of the natural growth of the local population with a modest level of inward migration to satisfy a reasonable level of demand which would enable the economy of the district to continue to thrive.

The results of the research done by the campaign groups is set out on the attached power point handouts. These show that:-

1. Warwick's population projection is now 28.7% less than the consultation draft local plan so is no longer up to date.



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2. All the other authorities in the Housing Market area are also showing similar reductions in their population projections, including Coventry after allowing for the temporary student bulge. Overall it is 36.3% lower than the JSHMA.
3. The method by which population is converted into the number of dwellings required needs better determination by calculation, using the known housing type and size to be included in the plan.
4. The lower housing target will require the list of sites to be included in the plan to be reduced. In sustainability terms this would imply brownfield sites being put first and only including greenfield where essential.
5. To delay a revision of the 5 year housing land supply calculation in the light of the new evidence of a much lower need for housing would be neglectful.
6. Dependent matters such as infrastructure needs and costs will then need to be matched to the new lower target.

It can be concluded on the basis of the foregoing, and on the more extensive work in this area undertaken by the Bishops Tachbrook Parish Council which we understand is the subject of a separate representation, that the local plan is unsound through having over-estimated the housing needs of the district. It would be neglectful of the council to persist in basing its calculations of need on the basis of superseded estimates of population growth.

Annex: Reprinted Powerpoint slides: New evidence that shows the WDC publication draft Local Plan needs revision.