

## Part B - Commenting on the Preferred Options

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

Sheet  of

Which document are you responding to?

e.g. Preferred Options (Booklet) Preferred Options (Full Version)

Preferred Options full version

Which part of the document are you responding to?

Preferred Option Box (e.g. PO1)

PO1

Paragraph number / Heading / Subheading (if relevant)

Preferred Level of Growth

Map (e.g. Preferred Development Sites – Whole District)

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).

Please see attached

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Ref:

Rep. Ref.

## Summary

The provision of 10,800 dwellings within the District between 2011 and 2029 is insufficient and will not provide sufficient housing to meet identified needs. The level should be increased to in the region of 13,000 for the same period.

## Discussion

The key aims of the emerging Local Plan, as set out in paragraph 2.5 of the document, include:

- Facilitating the growth and development of the local economy; and
- Meeting the housing need of the existing and future population of the District

This must be balanced against any likely adverse impact on the environment and on infrastructure. We strongly support these aims.

Projections of employment growth for the West Midlands were published in July 2010 and forecast 11,860 jobs for Warwick District between 2011 and 2031. Following the completion of this document the Council instructed GL Hearn to prepare a Strategic Housing Market Assessment, which was published in March 2012. This concludes that 11,900 dwellings will be required between 2011 and 2031 based on past population trends and population dynamics in the District (595pa). This would give a growth in the resident labour force of 8,250 jobs (12.3%), substantially below the projections of employment growth from the independent research in 2010. In order to provide housing to meet the 11,860 job forecast (with the same levels of in- and out-commuting), the report states there is a requirement for 14,300 additional homes (715pa).

The Preferred Option for the level of growth between 2011 and 2029 is stated to be 10,800 dwellings, equating to 600 dwellings each year. The justification for the choice of the lower figure is that the employment growth forecast is based on an improving economy from 2011 whereas in practice employment levels are not yet showing any signs of recovery (paragraph 5.22). In addition there is a 'lack of certainty' that the sufficient numbers of houses could come forward on strategic sites within the Plan period (paragraph 5.23).

In respect of the first matter it may well be the case that the jobs market has not progressed as fast as anticipated in 2010, but that does not mean we should not seek to support the projected level of growth. 20 years is a long time and just because we do less well at the start does not mean the economy will not catch up with itself in the later years. The Council must aim high in order to meet its objective of facilitating the growth and development of the local economy. Only by providing sufficient housing can this be achieved. Without the necessary housing companies will not locate to the area. If they do staff will either be forced to commute long distances, or pay excessively high prices for accommodation (to the detriment of the wider housing market). Alternatively companies may not be able to attract staff.

In respect of the second matter the Strategic Housing Land Availability Assessment (SHLAA), if taken on face value, indicates there is sufficient land available to provide some 13,400 dwellings by 2029. This would meet the higher figure recommended by the SHMA. In addition to this we would argue that other land is available and suitable for development, increasing the figure suggested by the SHLAA.

Finally it is important that high levels of housing are provided as this is the only way to meet the considerable affordable housing requirement. The SHMA indicates a net annual need for 698 affordable homes (paragraph 10.22). Whilst it is recognised the full need will not be met the higher the housing requirement the greater the chance of reducing the housing need across the District.