



Your ref:
Our ref: RB/1072

12/12/14

Development Policy Manager
Development Services
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH

By email: newlocalplan@warwickdc.gov.uk

Dear Sir Madam

REPRESENTATIONS TO THE PUBLICATION DRAFT LOCAL PLAN: FOCUSED CONSULTATION

These representations have been prepared by HOW Planning on behalf of Barwood Strategic Land II LLP ('Barwood') in response to the Publication Draft Local Plan: Focused Consultation being undertaken by Warwick District Council ('the Council').

These representations must be read in conjunction with those submitted by HOW Planning in response to the Warwick Local Plan 2011-2029 Publication Draft consultation, submitted in June 2014.

The objections raised in June, which demonstrate that the Plan is unsound, still stand and as detailed in the accompanying representation forms relate specifically to draft policies DS4, DS6, DS7, DS10, DS11, DS19 and DS20.

These representations have been prepared to specifically respond to the publication of the Coventry and Warwickshire Strategic Employment Land Study (ELS) October 2014, which is a key part of the Council's evidence base underpinning the emerging Plan. It is understood that the Council in the preparation of the Publication version used the emerging ELS (March 2014) to inform the Plan, however presumably at the time the ELS had not been finalised and certainly it was not publically available.

Barwood appointed specialist consultancy Peter Brett Associates (PBA) to carry out an independent assessment of the Study, in order to establish the key implications for the housing market area.

A report by PBA is attached, however in summary it is clear that if the local authorities accept the findings and recommendations of the ELS, then a significantly increased amount of housing will need to be delivered over and above the Strategic Housing Market Areas demographic scenarios if the economic strategy is to be delivered. There would need to be compelling reasons to justify why the recommendations of the report might not be followed.

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The ELS and in particular its recommendations have implications which go to the heart of the emerging Local Plan and have a specific bearing on draft policy DS6: Level of Housing Growth and DS20: Accommodating Housing Need Arising from Outside the District.

Previous work undertaken by PBA, presented in Barwood's June representations, highlighted that the Council had underestimated its proposed level of housing growth and therefore that draft policy DS6 is unsound. The recommendations of the ELS only serve to support PBA's findings.

Draft policy DS20 sets out that in the event that unmet housing need arising outside the District needs to be met within the District, then a review of the Plan will be carried out. Barwood's previous representations highlighted the shortcomings of this policy, but the Council's approach is undermined further with the recommendations of the ELS clearly pointing towards the need for additional housing across the HMA. The likelihood therefore of additional housing being needed in the District is increased by the ELS recommendations and there can be no assurance that the Council's approach will translate to the HMA's unmet housing requirements being provided for.

In summary, as set out in the attached representation forms, it continues to be Barwood's firm opinion that the Council's new Local Plan cannot be considered sound unless fundamental amendments are made as detailed in these representations and those submitted in June.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Barton', written in a cursive style.

RICHARD BARTON
ASSOCIATE

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Enc. Completed representation forms
PBA report