



WARWICK DISTRICT COUNCIL

DRAFT CORE STRATEGY 2012

HOUSING EVIDENCE BASE REVIEW PAPER

GALLAGHER ESTATES

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1. INTRODUCTION

- 1.1 The purpose of these representations are to review the proposed options for a new housing target for Warwick District between 2011 to 2029 and supporting evidence base. The robustness and credibility of the proposed policy approach to housing will be reviewed in accordance with national policy guidance, including the policy requirements of the NPPF and other relevant guidance.
- 1.2 The structure of the report will cover a number of factors, which provide the policy basis for the options for a new housing target for Warwick District. These factors are as follows: overall housing requirement; and housing land supply.

2. OVERALL REQUIREMENT

- 2.1 The Preferred Options level of growth for Warwick District is identified as 10,800 dwellings between 2011 and 2029, which is an annual average of 600 new homes each year. It further outlines that 550 new homes per annum will be delivered on new allocated sites (which does not include sites already with planning permission nor those the allowance proposed to be made for windfall sites).

Development Plan

- 2.2 In determining a housing supply figure, the first consideration is what figures are set out in the development plan. In respect of the situation regarding the West Midlands RS, the current position is that following the judgement on 10 November 2010 in the case of *CALA Homes (South) v Secretary of State for Communities and Local Government* the RS remains part of the development plan. The court determined that the proposal to abolish could be a material consideration in respect of development control decisions but in respect of development plan documents being prepared by an Authority, it would be unlawful for them to have regard to the proposal to abolish Regional Strategies.
- 2.3 The Localism Act intends for RS to be abolished, but this can only be following a Strategic Environmental Assessment. The consultation undertaken by CLG regarding the environmental report in the revocations of the West Midlands Regional Strategy ended in January 2012. In light of this, local planning authorities are in a difficult situation as the housing figures contained within the RS are based on out of date information (ONS

Subnational Household Projections dating back to 1996) plus the plan period over which only covers part of the plan period of the Core Strategy (i.e. to 2021).

- 2.4 Given that PPS 3 Housing has now been withdrawn, there is no policy requirement to have regard to the level of housing provision set out in the relevant emerging RS. The NPPF at paragraph 218 does though allow authorities to draw upon evidence that informed the preparation of regional strategies supplemented by up to date robust local evidence. The West Midlands Phase II Review has undergone public consultation and been subject to an examination in public that has reported. The housing requirement in the Draft Phase II Review for Warwick District Council, which took account of the Section 4(4), was 10,800 between 2006 and 2026 (540 dwellings per annum), which is consistent with the Preferred Option New Local Plan although the plan period is different between 2011 and 2029 (600 dwellings per annum). The housing requirement was subsequently increased by the Examining Panel to 11,000 between 2006 and 2026 (550 dwellings per annum). These figures were, however, based on the now out of date 2006 based subnational household projections. The Council therefore need more up to date and robust evidence to support their housing requirement.
- 2.5 In summary, figures in both the RS and the Phase II Review RS, can no longer be relied upon as they are considerably out of date. In addition, given the Localism Act 2011, it is likely that these documents will be abolished.

National Planning Policy Framework

- 2.6 The National Planning Policy Framework (NPPF) identifies that there is a need to look at more up to date information in order to determine the correct level of housing.
- 2.7 The NPPF sets out that local planning authorities should meet the full objectively assessed needs for market and affordable housing in the area. Factors to take into account include as scale and mix of housing which meets household and population projections, taking account of market trends and demographic change; addressing the need for all types of housing; and catering for housing demand and the scale of housing supply necessary to meet this demand (paragraph 50).
- 2.8 In respect of plan preparation, paragraphs 150 to 159 are of importance. They set out a need to provide for a Strategic Housing Market Assessment to assess the full housing

requirements, working with neighbouring authorities where housing market areas cross administrative boundaries.

- 2.9 At paragraph 179 of the NPPF, it sets out that joint working should enable local planning authorities to work together to meet development requirements, which cannot wholly be met within their own areas and that as part of this process they should consider producing joint planning policies.
- 2.10 At paragraph 182, Local Plan tests are set out which include the requirement to be: positively prepared – which seeks to meet objectively assessed requirements, including unmet needs from neighbouring authorities; justified – should be the most appropriate when considered against reasonable alternatives; effective – should be deliverable; and consistent with national policy – should enable the delivery of sustainable development.

Analysis of Local Planning Authority's Evidence Base

- 2.11 Given the very recent introduction of the above policy approach, Warwick District Council has not prepared a Strategic Housing Market Assessment strictly in accordance with the above requirements,. It is unknown whether a Strategic Housing Market Assessment compliant with the NPPF is due to be prepared. As highlighted above in relation to the procedural issues, it is disappointing, that this process has not taken place sooner i.e. in advance of the Preferred Options New Local Plan consultation/ or alternatively the Preferred Options New Local Plan consultation be delayed until this work has been completed in accordance with up to date policy as clearly the Preferred Options should be informed by such evidence, as specified within the NPPF.
- 2.12 The Strategic Housing Market Assessment March 2012 for Warwick District Council is the latest Housing Market Assessment prepared on behalf of the Council. There is concern that due to the timing of its publication, the SHMA does not reflect the latest policy guidance set out in the NPPF. It does, however, acknowledge the Draft NPPF. In the context of the NPPF, the main concerns are that the SHMA are that:
- it has not been prepared on a strategic basis with neighbouring authorities within the wider housing market area;
 - it does not meet household and population projections, taking account of migration and demographic change;
 - it does not address the needs for all types of housing; and
 - it does not cater for housing demand and the scale of housing supply necessary to meet this demand.

Not prepared on a strategic basis

- 2.13 Taking each point in turn, beginning with preparing the housing market assessment on a strategic basis, the report does not identify the extent of the housing market area/s within Warwick District. As identified previously, housing market areas often encompass wider areas beyond the administrative area of the District. It would be helpful if such relationships could be identified as it would then determine if sub regional discussions, as undertaken previously, are necessary to share growth. More comments in this respect are set out in relation to the Duty to Co-operate. For example, it is clear that the Major Urban Areas (such as Coventry, Solihull and Birmingham) within the West Midlands are unable (and potentially unwilling) to accommodate all arising growth and therefore it must be provided for elsewhere, in particular, sustainable locations surrounding the urban area. The emerging picture is that most authorities in the West Midlands are proposing to provide insufficient dwelling provision, which is contrary to national policy and will have severe social and economic implications for existing and arising households.

It does not meet household and population projections

- 2.14 In terms of the requirement to meet household and population projections, taking into account migration and demographic change, the SHMA has tested a range of scenarios for housing growth, which are in summary based on: varying levels of migration; zero growth (for migration, employment and population); varying levels of economic growth and varying rates of house building.
- 2.15 Early on in the assessment the 2008 based household projection figure for Warwick District is tested, however, it is dismissed and not taken into consideration within the conclusions. This is on the basis that more recent levels of migration show a lower level of migration. It is acknowledged that migration data for the past five years is used by ONS to calculate migration going forward. It is considered, however, that unique circumstances have arisen in the past five years, which have led to a lower level of migration occurring, such as: economic factors (within the last five years we have experience the most severe recession since post war); and lack of dwelling completions within the District over the past five years due to the implementation of a housing moratoria. In terms of this latter point, dwelling completions have reduced by 33% in the more recent five year period (1,709 between 2006 and 2011) when compared with the latest five year period relevant to the 2008 based household projection figure (2,559 between 2003 and 2008). In addition, it should also be noted that when comparing migration trends over the longer term there are fluctuations, where levels net migrants are in excess of 2,000 in one year for three consistent years. Indeed the migration level between 2003 and 2008 reflects quite a conservative position. The approach put

forward in the SHMA assumes a constant average level of net migration of 490 additional people per annum and does not cater for such fluctuations over the plan period. The 2008 based population projections do, however, reflect such fluctuations over time. Given the specific circumstances, it is therefore considered that the average level migration over the past five years of 490 net migrants per annum should not be applied to determine the future housing requirement nor are the other migration scenarios, which test sensitivity, are appropriate.

2.16 In terms of the zero growth scenarios, it is acknowledged that these have been prepared as a theoretical exercise in order to identify levels of indigenous growth, however, such scenarios should not be planned for as, for example, in terms of zero net migration, if migration is not catered for there will be additional pressure upon local housing markets. There are no mechanisms to prevent migration from occurring between areas of the UK. Restricting the supply of housing will reduce opportunities for local households to acquire homes on the open market. It is therefore important that migration is properly provided for to prevent the local indigenous households from being disadvantaged if the local authorities wish to secure sustainable communities. This also applies to situations where the only a proportion of the migration is being catered for as set out above.

2.17 In terms of achieving zero economic growth, clearly this is not a desirable policy outcome. It is contrary to the NPPF and vision set out within the Core Strategy. Similarly, population growth is inevitable given that people are living longer and the numbers of births outweigh the deaths in the District. A consequence of restricting population growth is that given people are living longer, there is likely to be an ageing population and the number of economically active people will reduce, which will have a detrimental impact on the economy. Such outcomes are unreasonable scenarios, which should not be planned for in any event.

2.18 In respect of the employment/ economic growth scenarios, without being able to access the West Midlands Integrated Policy Model we are unable to fully comment on this scenario. It is understood that there is a high economic participation within the District and that it performs well when compared with the regional and national average. In light of this, it is considered that projections for economic growth should remain ambitious and not be constrained by unjustified growth levels. Given the buoyant economy, the Council should plan to ensure the District remains competitive by ensuring there is an available workforce to meet the demands. Clearly, it is more sustainable for demand to be met within the District than outside and therefore the Council should ensure that there are sufficient dwellings to meet such needs.

2.19 A further comment in respect of such economic scenarios is that, as identified previously, does not consider arising housing needs and demands and the impact of policy planning. As

set out within the NPPF at paragraph 50, factors to be taken into account of when identifying an appropriate housing requirement include scale and mix of housing which meets household and population projections, taking account of market trends and demographic change. These scenarios do not consider such factors and should be discounted. The NPPF refers to catering for demand. The Council's methodology would potentially limit demand and does not show how actual demand would be met.

- 2.20 If the arising housing needs and demands as identified by the household and population projections are catered for it is likely (as presented in the Pegasus evidence) that the employment growth will increase further as there will be more people in Warwick. This additional population will contribute towards economic growth and therefore improve the economic success of Warwick. It is a shame that the SHMA does not include employment growth against the 2008 based household projections scenario as this would reveal that it is one of the best options to secure economic growth.
- 2.21 Finally, in terms of the scenarios based on varying house building rates, there is concern, however, that these scenarios do not consider arising housing needs and demands and the impact of policy planning. As set out within the NPPF at paragraph 50, factors to be taken into account of when identifying an appropriate housing requirement include scale and mix of housing which meets household and population projections, taking account of market trends and demographic change. These scenarios do not consider such factors and should be discounted.
- 2.22 If the arising needs and demands of the household and population projections are not provided for within the administrative boundary of Warwick District, the Council would need to ensure that appropriate arrangements through the duty to cooperate are in place to provide for the level of needs and demands not being provided in Warwick (this is applicable to almost all of the scenarios presented). There is no evidence of such cross boundary cooperation taking place. In fact, the opposite is taking place, whereby neighbouring authorities are also not providing for the arising population and household needs.
- 2.23 Further, it is clear that when examining past performance of housing delivery (i.e. 2001/02 and 2002/03, which delivered completions of 844 and 946 per annum respectively), it is clear a higher rate of delivery can be achieved (in order to respond to arising needs and demands). A few years following, the Council implemented a moratorium due to concerns that too many houses were being built in excess of the appropriate target at that time, after which the economic downturn occurred. It is acknowledged that there will be peaks and falls in housing delivery over the lifetime of the plan period as a consequence of the economic circumstances,

however, the development industry can achieve reasonably high annual averages and should not be constrained by a superficial target.

2.24 In addition, the 2010 based population projections have been published which identify that population growth between 2011 and 2031 is broadly consistent with the 2008 based population projection figure of circa 27,000 additional people. The household projections for the 2010 based data set have not yet been published, however, given that the level of population growth is similar the household projection figure from the 2008 based data (circa 15,500 households) is considered to be a good guide to identifying future housing requirements. It is therefore considered that the Council should pursue a housing requirement that meets the 2008 based household projections, taking account of migration and demographic change and is therefore consistent with the NPPF. This scenario should be reflected within the SHMA. Further evidence identifying a requirement that meets the 2008 based household projections is provided below under the heading of Pegasus Planning Group Evidence Base.

2.25 To conclude, the only option tested, although not presented as a scenario for dwelling provision within the SHMA, that is considered to be in accordance with national guidance is the 2008 based household projection. It is advised, however, that given more recent information is available in the form of the 2010 Based Population Projections, further options that incorporate this up to date data should be prepared and presented within the Strategic Housing Market Assessment and carried forward into the Local Plan.

It does not address needs for all types of housing

2.26 Paragraph 159 requires that SHMAs address the need for all types of housing, including affordable housing and the needs of different groups in the community (such as but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes). It is considered that the SHMA does not fully cover all categories identified. It acknowledged that the NPPF was published following the completion of the SHMA, however, it should be updated accordingly.

It does not cater for housing demand and the scale of housing supply necessary to meet this demand

2.27 There is concern that the SHMA does not cater for housing demand and the scale of housing supply necessary to meet this demand. For example, in Figure 7.17 identifies that the total net annual affordable need of 698 dwellings per annum. Clearly this does not reconcile with the 600 dwellings per annum identified in the Preferred Options New Local Plan. Based on

solely providing for affordable needs the Local Plan would need to deliver 12,564 dwellings between 2011 and 2029, which is some 1,500 dwellings in excess of the proposed housing requirement. Indeed, this does not address providing for market demand, which would be in addition to this figure. As identified previously, the SHMA should revisit housing provision scenarios in accordance with 2008/ 2010 based household projections and the migration assumptions associated with these projections.

- 2.28 To conclude in relation to the SHMA, there are a number of deficiencies as identified above. It is recommended that the SHMA and where relevant the Local Plan is updated as suggested in order to improve soundness.

Pegasus Planning Group Evidence Base

- 2.29 Given the approach of the Council, Pegasus Planning Group has prepared evidence, using demographic methodology (similar to that used by the National Housing and Planning Advice Unit), in order to identify an appropriate housing requirement for Warwick District. More sophisticated evidence, using the Chelmer Model, which is a demographic housing model that was developed by the Population and Housing Group at Anglia and Ruskin University, will be presented to the authority in due course. For this consultation exercise, however, a demographic method has been used to identify an appropriate housing requirement.
- 2.30 Firstly, in order to assess full housing needs, there is a need to take into account evidence of current and future demographic trends, market trends and needs of different groups in the community, in accordance with paragraph 159 of the NPPF.
- 2.31 As identified above, a SHMA has recently been produced here but its results are open to question because of its significantly different conclusions in comparison to the official government projections.

Needs of Different Groups in the Community

- 2.32 With regard to the needs of different groups in the community, the demographic assessment will produce additional household figures for a particular area. They do not however include figures for unmet needs.
- 2.33 With regard to the SHMA, this has been recently undertaken, as set out above. It is therefore relatively recent evidence. The figures relating to the projections are not considered sound, but the figures relating to affordable housing need are in many respects based on existing

factual information, for example the waiting lists of the Authority. The document sets out in figure 7.16 the total current housing need and then considers future need against affordable housing supply in Warwick District. It identifies that the current annual total housing need of 1,144 and a total net annual housing need of 698 dwellings. This means over a five year period need for affordable housing is estimated at 3,490 dwellings.

Latest Published Household Projections

- 2.34 The most recent household projections are the 2008 based household projections, which were published in December 2010. These set out an increase of 15,500 households 2011 to 2031 in Warwick District.
- 2.35 Support for using the 2008 based household projections, because they are the most up to date information, is to be found in an appeal decision dated 15 September 2011 in Nuneaton and Bedworth (APP/W3710/A/11/2153247). This is dealt with in paragraphs 6 to 14. The Inspector is clear that the use of RS figures is flawed because the council failed to take account of more recent evidence. He used the most up to date figures available which were the 2008 household projections and found a five year supply shortfall.
- 2.36 Indeed more recently, post publication of the NPPF, an appeal decision dated 1 June 2012 in Torquay ((APP/X1165/A/11/2165846) refers (in paragraph 51) that the CLG 2008 based household projections constitute the most reliable up to date figures, and therefore the best evidence on which to base the assessment of the housing supply position.
- 2.37 Additional factors need to be added in order to convert household projections into dwellings required. These factors include an allowance to deal with unmet need or backlog (concealed households and reduction in sharing households), take account of second homes and also to add a figure for vacancies. This is in accordance with the requirement in the NPPF to address the need for all types of housing and also to cater for housing demand. The approach is confirmed in the NHPAU document entitled "*Meeting the Housing Requirements of an Aspiring and Growing Nation*" (June 2008) paragraph 76, which outlined that the demographic method is the traditional approach used by planning authorities when developing housing plans.
- 2.38 Such factors can be added to arrive at a future dwelling provision figure. It can also be done by way of an established model which takes into account the most recently available data set. A recognised, reputable model for dealing with this is the Chelmer Model. As identified above, results using the Chelmer Model will be presented in due course.

(a) *Simple Conversion of Household Projections to Dwellings*

2.39 Dealing firstly with the simple conversion of the household projections to dwellings, in respect of Warwick the figure for unmet need as identified in the SHMA totals 1,144 dwellings required. With regard to second homes, a figure of 1.1% is considered to be appropriate according to NHPAU advice paragraph 90.

2.40 In respect of vacancy rates the figure I utilise below is 3%, again from the NHPAU advice Table B7 page 83 and paragraph B90, which represents a conservative estimate and was used in considering housing provision figures for the emerging RS.

2.41 Thus converting the households to dwellings gives the following:

2008 Household projections increase 2011 to 2029	15,500	
Unmet Need (SHMA)	1,144	
Second Homes at 1.1%	<u>171</u>	
Sub total	16,815	
Vacancy rate at 3.0% of sub total	<u>504</u>	
Approx number of additional dwellings required	17,319	861p.a.

2.42 Thus in respect of the evidence of future levels of need and demand it is clear that there is evidence for at least some 17,319 dwelling between 2011 and 2029.

Summary

2.43 It is clear therefore that based on guidance set out in the NPPF, there is concern that the housing requirement scenarios presented would be unsound as they are not consistent with national policy, it is not justified nor positively planned. The local planning authority should therefore review the proposed approach and increase the housing requirement accordingly to take account of the clear need for at least 17,319 dwellings 2011 to 2029 (861 dwellings per annum) based on evidence using the demographic method and therefore the LPA should test the implications arising from the latest information, which is likely to result in a significantly increased dwelling requirement.

3 SUPPLY OF HOUSING LAND

- 3.1 The NPPF requires local planning authorities to prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified requirement for housing over the plan period.
- 3.2 Warwick District Council published a Strategic Housing Land Availability Assessment in May 2012 which was a second review of the SHLAA, first published in March 2009 and subsequently reviewed in June 2009. The SHLAA refers to the Methodology Document produced in 2008. Whilst this document follows the requirements of the Practice Guidance, it also contains reference to now out of date planning policy and surveys being undertaken by the Council in 2008. It is considered that the Methodology Document should now be updated to reflect changes in the planning policy framework and more up to date survey work undertaken by the Council.

Stage 1: Planning the Assessment

- 3.3 Within the methodology, it is explained that the Council has set up a Partnership to assist with developing the methodology and share expertise and knowledge of the area. The Partnership includes a mixture of key stakeholders from the public and private sector. The SHLAA sets out at paragraph 3.13 the key conclusions from the SHLAA partnership in terms of the current housing market and the impact these issues would have on the future housing requirement and supply.
- 3.4 In addition to the SHLAA partnership, a number of service providers were consulted with to assess the capacity of local infrastructure to meet the demands generated by the new homes.
- 3.5 This approach is considered to be thorough and consistent with good practice.

Stage 2: Determining which Sources of Sites will be included in the Assessment

- 3.6 With regards the extent of the study, the SHLAA states that only sites in sustainable locations consistent with national planning policy were assessed in order to avoid wasting resources assessing sites not in conformity with national policy. This is considered to be inconsistent

with the Practice Guidance which requires the SHLAA to aim to identify as many sites with housing potential in and around as many settlements as possible in the study area (paragraph 7). The local planning authority should therefore encourage submissions from all settlements within the District.

- 3.7 The assessment adopts a site size threshold of sites with a capacity of 5 dwellings or more. It is considered that sites of 5 or fewer dwellings in smaller towns and villages could make a significant contribution to housing needs in these areas, particularly in terms of affordable housing provision and should be included within the assessment.

Stage 6: Estimating the Housing Potential of each Site

- 3.8 The SHLAA methodology (2008) sets out a number of methods which could be used to estimate the potential capacity of sites. Whilst all approaches are suitable for the task, it is considered that a consistent approach should be applied to ensure consistency.
- 3.9 It is recommended that whilst the estimates presented by the promoters of the site can be considered, these should not be relied upon when determining the capacity of sites, as the methodology undertaken by the promoters in this calculation is unknown.
- 3.10 The Local Plan policies referred to are now out of date and should not be applied in calculating the capacity of sites. There is inconsistency between the methodology Document (2008) and the 2012 SHLAA. In that the 2008 methodology refers to Policy DP5 which requires development to achieve net densities of no less than 50 dwellings per hectare in town centres and no less than 30 dwellings per hectare elsewhere. The 2012 SHLAA sets a reduced average density from the previous SHLAA, reflecting advice from the SHLAA partnership, of 35 dwellings per hectare (reduced from 40 dph in the previous SHLAA).
- 3.11 The methodology section of the 2012 SHLAA document (paragraph 3.15 – 3.20) provides a more consistent approach, explaining the proportion of sites calculated for residential development and the densities applied. This is considered to be an acceptable approach.

Stage 7: Assessing when and where the Sites are likely to be Developed

Assessment of Suitability

- 3.12 This part of the SHLAA methodology considers the desktop review of existing information, determining which sites and areas will be surveyed and carrying out the survey. Paragraph

3.6 identifies the criteria which have been considered in the assessment of sites. These are consistent with Paragraph 38 of the Practice Guidance.

- 3.13 Paragraph 3.9 explains the rationale behind the assessment of sites in rural areas, explaining that whilst small scale housing developments to meet a local need or support services may be acceptable, it would be contrary to policy to allocate large scale housing developments adjacent to rural settlements. The SHLAA methodology has already stated that a site size threshold has been set so sites under 5 dwellings are not assessed. As such, if, as stated above, larger sites are discounted for not being in accordance with national policy, and smaller sites are not assessed due to the adopted threshold, there is concern that no sites will be considered in rural areas. In addition, the methodology applied presumes that existing policy relating to development in rural areas will be retained. It is not the place for the SHLAA methodology to second guess future planning policy. It is considered that adopted policy, at the time of preparing the SHLAA, should be applied with any draft and emerging policies given the appropriate weight as a material consideration.

Stage 8: Review of the Assessment

- 3.14 The SHLAA sets out an analysis of housing supply as a result of the site assessment which sets out how much housing can be provided and at what point in the future. This is considered to be consistent with the Practice Guidance. The SHLAA identifies a potential capacity of 13,385 dwellings over the period 2014 – 2029. This exceeds the New Local Plan requirement of 10,800 dwellings between 2011 and 2029.

Stage 10: Determining the Housing Potential of Windfall

- 3.15 Finally, in terms of windfalls, the SHLAA includes 2,001 dwellings from a non site specific source (windfalls). The NPPF identifies that local planning authorities may make an allowance for windfalls in the five year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.
- 3.16 The only reason why windfalls appear to be included is on the basis that historically windfalls have come forward at very high rates. A robust SHLAA will have identified many of the sites that previously would have derived from windfalls and there are sites which only arose because of us of garden land, which is ultimately significantly over estimating the contribution that may be obtained from windfall today.

- 3.17 The approach of Warwick District is not consistent with other authorities in the West Midlands which, in the past have had high windfall rates. By way of example Lichfield District Council SHLAA does not include windfalls stating that where windfalls do occur in the future they will be accounted for in future reviews of the SHLAA. This approach should be adopted in Warwick District.

Summary

- 3.18 When reviewing Table Two of the SHLAA, it is clear that there is a capacity for circa 13,385 dwellings (excluding windfalls). When comparing this supply figure with the requirement figure identified earlier, there are insufficient sites to deliver the proposed requirement of circa 17,300. It should be noted that it is likely that the supply would be increased further as a result of taking the above comments on board (i.e. including other sites within settlements previously excluded and sites below the minimum threshold adopted).

4 CONCLUSION

- 4.1 It is considered that the housing requirement proposed in the Preferred Options New Local Plan should be positively prepared and fully justified in accordance with the NPPF, which means it should seek to meet objectively assessed development requirements and be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- 4.2 As demonstrated there is concern that the housing requirement does not meet the above tests and therefore the Local Plan on this basis would be unsound. It is suggested, based on evidence in accordance with the tests that the policy requirement be increased to provide for arising needs and demands to at least a minimum of 17,300 dwellings.
- 4.3 In terms of the proposed housing land supply, there are a number of concerns that need to be addressed in order to ensure that the evidence in respect of each source is robust and credible.
- 4.4 To conclude, it is considered that if the above concerns are addressed as part of preparing the New Local Plan, the proposed policies relating to the housing requirement and land supply will be more consistent with national requirements as set out in the NPPF and SHLAA Practice Guidance.