

Warwick District Local Plan

CPRE Warwickshire Representations June 2014

Main Response on key policy in Plan – level of new housing

Policy DS6 – Level of Housing Growth in Warwick District

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: **Local Plan**

Paragraph Number:

Policy Number: **DS6 Level of Housing Growth**

Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant? **No view**

5.2 Complies with the Duty to Co-operate? **No view**

5.3 Sound? **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: **Not justified**

Effective: **Not effective (not deliverable)**

Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

Housing Need and Demand

The population of the district grew by 14,800 (11.9%) between 2000 and 2010. This was a very much faster rate of growth than for the West Midlands (3.5%). The district's growth was fuelled by a high rate of net in-migration averaging 460 per annum between 2005 and 2010.

However averages are highly misleading in this case. Net in-migration fell from a figure of over 2,000 per annum in the years immediately following the millennium to 400 in 2008-9 and net out-migration of 700 in 2009-10. This is a very clear and striking trend. In view of this dramatic change it is not acceptable, as the 2012 SHMAA did, to take the 460 average and simply project it forward over the plan period. Unless the 2009-10 figure is shown to be an aberration, there is a real possibility that there will be net out-migration from rather than in-migration to the district over the plan period. Some of the projections in the 2013 Strategic Housing Market assessment (SHMA) opt for even higher in-migration assumptions.

We regard the past rate of growth of population and in-migration as unsustainable in the long-term. If continued, it would place inordinate pressure on the district's high quality environment and its infrastructure. It would also encourage out-migration from Coventry and weaken the urban regeneration efforts of that authority. In our view, the District Council should be planning for a very much lower level of growth in which housing and employment are balanced against environmental objectives. Although the District Council claim in paragraph 1.51 of the Plan that this is what the Plan does, we see little or no evidence that they are right.

The rate of house building has also been very high over the past decade. The housing stock grew by 6,011 between 2000 and 2010, an 11.3% increase, compared with the national figure of 7.1%. We cannot accept that Warwick District is suitable for a rate of growth over 50% higher than the national average.

The Plan draws on two recent Strategic Housing Market Assessments – for Warwick District alone in 2012 and for Coventry and Warwickshire in 2013. They have carried out a wide range of population and household projections based on different assumptions. In the 2012 Assessment, for example, six of the ten projections not based on house building scenarios fall within the range of between a 7,000 and 11,000 increase in households between 2011 and 2031 – ie averages of between 350 and 550 per annum.

However the SHMAs cannot claim to have been an objective assessment of housing need. The work was commissioned by local authorities and the steering committees were dominated by development interests who have a vested interest in talking up the housing needs figures. Wider interests such as residents' groups and environmental bodies were excluded from the process. Because the Local Plan draws on the Assessments, it is unsound. The Strategic Housing Land Availability Assessment (SHLAA) was also monopolised by narrow development interests without the moderating influence of organisations with wider policy concerns.

In preparing their plan, WDC have assumed population growth of 17% between 2011 and 2029. This rate of growth would be above that for almost all the SHMA Projection Scenarios, despite the plan period being two years shorter than that of the SHMA. No justification is provided in the Plan for the choice of this figure.

The District Council have recognised the importance of relating housing need to economic growth forecasts. However the latter are also subject to great uncertainty, particularly at the level of an individual district. The link between economic activity and employment is particularly difficult to forecast because it depends on labour productivity, and the implications for housing need cannot be assessed without explicit assumptions about the level of in- and out-commuting in future, which appear to be lacking in this plan.

The Plan proposes (policy DS6) housing provision of 12,860 between 2011 and 2029 – a higher figure than in previous versions of the Local Plan on which consultation was carried out.. Provision was 12,300 in the Revised Development Strategy and 10,800 in the previous version. The text does not make clear how the latest figure has been arrived at, or how it relates to the evidence in the SHLA, SHMAAs and elsewhere. The Plan is therefore unsound in its provision for housing.

In May 2014, the Office for National Statistics published new 2012-based population projections for England. They suggest that population may grow by 20,900 (15.1%) in Warwick District between 2012 and 2037. This is a very much lower rate of growth than the growth that actually occurred between 2000 and 2010. It is also much lower than the equivalent figures from the 2010-based and 2011-based projections. The differences are attributed mainly to rebasing of trends following the 2011 census, but there are also changes in trends on births, marriages and migration, and changed assumptions about international migration. Both Warwick's and Warwickshire's population are now forecast to increase at a slower rate than the national average. We have reservations about the validity of population projections for individual districts, but if taken literally, the new projection would suggest that the need for new homes is about 3,700 below what the Plan has assumed for this reason alone.

Another reason why housing need may be lower than the Plan assumes is the assumption about average household size. This figure had been falling for a long time. However it has stabilised since 2001 and evidence suggests that it is increasing again. The latest figure we have is 2.295 persons per household (2011), as opposed to the 2001 figure of 2.245. Despite this, the Plan assumes a figure of 2.181. Housing need assessments are very sensitive to assumptions about average household size. WDC have assumed too rapid a fall in average household size during the plan period.

Taking all these factors into account, we consider that the Plan is unsound because its housing provision is based on out-of-date information and on an over-optimistic, inflated view of both employment and population growth prospects. The District Council have convinced themselves that continuing high growth is desirable, but this view is not shared by those responding to public consultation on previous versions of the Plan, and is increasingly at odds with the facts and with the latest ONS population projections. These issues need to be thoroughly debated at the examination in public in the light of the latest information then available.

CPRE's view is that housing provision of about 8,000 dwellings 2011-2029 is likely to be realistic and sustainable.

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend policy DS6 to read “The Council will provide for approximately 8,000 new homes between 2011 and 2029.”

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, we 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 advance our argument further, to take account of the views of other parties, and to answer any response by the local planning authority

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: **Mark A Sullivan for CPRE Warwickshire**

Date : 26 June 2014

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