

Warwick District Local Plan Examination Initial Matters and Issues identified by the Inspector

N.B. These only relate to the duty to co-operate, soundness in terms of overall provision for housing and soundness in terms of the supply and delivery of housing land which will be considered at the initial hearing sessions. Other issues such as the distribution of development across the District, the approach to the Green Belt and specific site allocations will be dealt with in due course, if the examination progresses.

Matter 1 – The duty to co-operate

Issue

Whether the Council has complied with the duty to co-operate in the preparation of the Local Plan.

Questions

General

- 1) What are the genuinely strategic matters as defined by S33A(4) of the Planning and Compulsory Purchase Act?
- 2) Who are the relevant local authorities and prescribed bodies in terms of co-operating on these strategic matters during the preparation of the Local Plan?

Overall housing provision

- 3) Is the Council's assessment of the extent of the Housing Market Area (HMA) correct? What is the evidence that supports this view? Is there evidence to support an alternative view of the extent of the HMA?
- 4) What is the situation regarding commuting and migration patterns between authorities in the HMA? What are the interrelationships in terms of housing markets? In particular what are the relationships between Coventry and other authorities in terms of commuting, migration and housing markets?
- 5) How do these interrelationships affect Warwick District specifically?
- 6) When did co-operation with other authorities on overall housing provision within the HMA begin?
- 7) What form has co-operation taken? Has it been ongoing during the preparation of the Local Plan?
- 8) To what extent is there agreement between the authorities in the HMA regarding the level of objectively assessed need for housing (OAN) for the HMA and individual authorities? Is this as set out in the 2014 SHMA Addendum?
- 9) What is the evidence that the level of need in individual authorities and the HMA as a whole will be met i.e. in terms of capacity assessments/SHLAAs/Green Belt studies etc.?
- 10) Will there be unmet needs within the HMA? In particular will there be unmet needs in Coventry? If so, what is the scale of this unmet need?
- 11) What are the issues as far as Warwick District is concerned in addressing unmet needs from other authorities i.e. Coventry?
- 12) What is the situation regarding housing needs beyond the HMA i.e. Greater Birmingham affecting the HMA? What form has co-operation with other relevant authorities taken? What has been the outcome?
- 13) Has the issue of unmet need within the HMA or beyond been addressed and resolved?
- 14) How does the Local Plan deal with the issue? Is this an appropriate approach?
- 15) What are the implications for compliance with the duty to co-operate of not addressing this issue at this stage?

continued

- 16) What additional work is required to address and resolve the issue of fully meeting OAN for the HMA? What progress has been made? What agreements are in place?
- 17) In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue of housing provision?

Other matters requiring co-operation

For each of the other strategic matters

- 18) What are the particular issues?
- 19) Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
- 20) In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?
- 21) Are there cross boundary issues in relation to any of the proposed site allocations such as transport or other infrastructure requirements?

Matter 2 – Overall provision for housing

Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing.

Questions

- 1) What is the position of the authorities in the HMA regarding OAN?
- 2) What do population and household projections indicate?
- 3) How do the recently published 2012-based household projections affect the situation? *N.B. the 2012-based household projections and an information note produced by the Council at the request of the Inspector are available on the Council's website http://www.warwickdc.gov.uk/downloads/file/2516/exam_4_-_wdc_paper_re_clg_2012_based_household_projections*
- 4) Does the Coventry and Warwickshire Joint SHMA 2013 and Addendum of 2014 provide a robust evidence base for OAN in the HMA and individual authorities? What factors were taken into account and is the methodology appropriate?
- 5) What are the assumptions in terms of population change, migration, household size and household formation rates? Are these justified?
- 6) How has the issue of unattributable population change been dealt with and is this justified?
- 7) What are the assumptions regarding economic/employment growth and are these justified?
- 8) How have market signals and affordable housing needs been taken into account?
- 9) What effect have all of these factors had on the figures for OAN in individual authorities and the HMA as a whole? i.e. how have household/population projections been adjusted?
- 10) Will there be unmet needs? Specifically what is the situation in Coventry?
- 11) Will these needs be met elsewhere in the HMA? Is this clear?
- 12) What is the approach of the authorities in the HMA to addressing this issue? What additional work needs to be undertaken and over what timescale?
- 13) Is the approach of the Local Plan to this issue (in particular Policy DS20) appropriate? What are the implications of this approach in terms of soundness?
- 14) What is the specific basis for the figure for OAN in Warwick District? Is it justified and appropriate?
- 15) Is the level of housing planned in the Local Plan sufficient to meet OAN in the District? And in the HMA?
- 16) What would be the implications for population change, migration and employment growth?
- 17) Is the level of housing planned appropriate? Should it be increased or decreased? If so to what level and on what basis?
- 18) Is the plan period to 2029 appropriate? Should it be extended?

Matter 3 – The supply and delivery of housing land

Issue

Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.

Questions

- 1) What is the up to date situation regarding completions to date in the plan period and what is the residual amount of housing that needs to be delivered?
- 2) What is the potential total supply of new housing? What is the basis for this figure and is it justified? How much of this would be consistent with policies in the Local Plan? How much would be developable within the plan period? How does total potential supply compare with the planned level of provision?
- 3) What is the estimated total supply in the plan period from
 - a) existing planning permissions
 - b) other commitments e.g. sites subject to S106
 - c) allocated sites
 - d) other sites specifically identified e.g. SHLAA
 - e) windfalls
- 4) What are the assumptions about the scale and timing of supply and rates of delivery from these various sources? Are these realistic? Has there been any discounting of sites with planning permission for example?
- 5) Specifically, is the figure for windfalls realistic and justified?
- 6) What are the potential sources of windfalls? Given that the Local Plan and SHLAA have provided the opportunity to identify specific sites, are windfalls likely to come forward on the scale envisaged? What would be the implications if they didn't?
- 7) How has flexibility been provided in terms of the supply of housing? Are there other potential sources of supply?
- 8) Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 47 of the NPPF? How should the level of completions since 2011 be taken into account? What would the requirement be for a five year supply including a buffer?
- 9) Would the Local Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?
- 10) In overall terms would the Local Plan realistically deliver the number of dwellings required over the plan period?