

Our ref: 794-PLN-MNP-JBB8381-C8489



Date: 24 January 2024

FAO Andrew McCormack BSc (Hons) MRTPI  
Sent via Ian Kemp  
[ikemp@icloud.com](mailto:ikemp@icloud.com)

Dear Inspector,

**Response to EXAM 25 Inspector's Letter re: Examination of the Warwick Net Zero Carbon DPD (9th January 2024) – Written Ministerial Statement: Local Energy Efficiency Standards Update (13th December 2023) and National Planning Policy Framework Update (19th December 2023) on behalf of Taylor Wimpey**

Thank you for your invitation set out in your letter dated 9<sup>th</sup> January 2024 for representations from those who made representations at Regulation 19 with regards to any possible implications of the above on the content of the DPD and procedural arrangements.

On behalf of our client Taylor Wimpey RPS made representations at the Regulation 19 stage and now wish to make further representations in response to your invitation. As set out in our previous representations (reference 72216 on behalf of Taylor Wimpey [14433] made by Jacob Bonehill [15583]) Taylor Wimpey is supportive in principle of the Council's ambition to achieve net zero carbon emissions from new development but have a series of concerns with the DPD as consulted upon. For the avoidance of doubt, the summary of our representations set out on page 19 of SUB12 is inaccurate. In our view the DPD is not sound due to being not justified, not effective, and not consistent with national policy (see paragraphs 2.8, 2.10, 2.14, 2.17, 3.3, 4.5 and 5.2 of our Regulation 19 representations.

Notwithstanding the points that we have raised previously, which will have already been taken into consideration during the ongoing Examination in Public, we consider that the Written Ministerial Statement on Local Energy Efficiency Standards (WMS) made on 13<sup>th</sup> December 2023 further supports our Regulation 19 representations. Specifically, we consider that the current evidence base before the Examination does not ensure:

***“That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework;” (Emphasis added)***

**Our ref: 794-PLN-MNP-JBB8381-C8489**

The viability testing undertaken in support of the DPD set out in SUB6 from page 33 onwards tests a range of development typologies at different value points and with proportions of affordable housing provision at 40% (policy compliant), 35% and 30%. This testing indicates that even when reducing affordable housing provision to 30% there are a range of housing typologies that would not be viable. The Council's position has to date been that in such scenario's consideration will be given to reducing either, or both, the requirements for affordable housing provision and achieving the proposed local energy efficiency standards. Whilst this flexible approach is clearly welcome, and indeed necessary to comply with the National Planning Policy Framework this does not meet the requirement set out in the WMS to consider the impact on housing supply and affordability.

The Council have not set out the specific impact on housing supply and affordability of the DPD in their evidence to date. To address this the Council should produce the evidence to show what level of Affordable Housing provision would be viable if the policies in the DPD are applied and then clearly quantify the impact on the overall supply and affordability of housing.

If this exercise is undertaken as required by the WMS the evidence will show that affordability will worsen. In addition, there will clearly also be implications for the overall supply of housing. Depending on the scale of these impacts we suggest that the Council should then give consideration to the allocation of additional housing sites to address the adverse impact on affordability and supply **to ensure that the DPD is sound**. Alternatively, the Council should withdraw the DPD from Examination so as to not adversely impact on housing supply and affordability.

In summary, Taylor Wimpey consider that the WMS requires the Council to prepare additional evidence to consider the impact of the DPD on housing supply and affordability. Dependent on the findings of this work Taylor Wimpey consider that the Council may need to either allocate additional development sites or alternatively withdraw the DPD from Examination.

Yours sincerely,  
for RPS Consulting Services Ltd

**Jacob Bonehill MA(Cantab) MSc MRTPI FRSA**  
Associate Director - Planning

████████████████████  
████████████████