



North Warwickshire
Borough Council

Core Strategy
Main Modifications
Representation Form

Ref:

(for official use)

Please return to North Warwickshire Borough Council by **21st August 2014**

PLEASE USE THIS FORM TO RESPOND TO THE MAIN MODIFICATIONS ON THE CORE STRATEGY ONLY

The Council are seeking comments on the Modifications to the Core Strategy, following the Examination in Public (January 2014). The changes are proposed by the Inspector to address issues of legal compliance and soundness and we are only able to accept representation on these matters.

Please send us your comments no later than 5:00pm by the **21st August 2014** to the following address: Forward Planning Team, Chief Executives Division, Council Offices, South Street, Atherstone, Warwickshire, CV9 1DE or email planningpolicy@northwarks.gov.uk

Any representation received will be a public document, all details of which will be stored on a database, and made available for inspection at the council's offices and on the council's website

Please provide your details below.
(If you are an agent please provide both your details as well as your clients.)

Name: Alex Roberts – Development Plan Manager

Organisation (if applicable): Tamworth Borough Council

Address: Alexander-roberts@tamworth.gov.uk

Email:

Q1. Please give the Main Modification reference number that your representation relates to
(use a separate sheet for each representation and each modification)

Modification Reference

MM18

Q2. Do you consider the Main Modifications to be Legally Compliant?

YES

NO

Q3. If you consider the Proposed Main Modifications to be Unsound, please identify which test of soundness your comments relate to?

Positively prepared

Effective

Justified

Consistent with National Policy

Q4. Please give details of why you consider the Main Modifications not to be legally compliant or unsound. Please be as precise as possible. If you wish to support Modifications please also use the box below to set out your comments.

This table is misleading as to how Tamworth's housing needs will be met and what the annual housing requirement for North Warwickshire is. The objectively assessed need for North Warwickshire and the un-met need arising from Tamworth should be set out at the start and be combined to produce an annual housing requirement. If this is not combined how will a 5 year housing supply be accurately measured that ensures the needs for Tamworth are met? By placing Tamworth's needs at the end of the equation and removing them from the annual requirement equation they are still being treated as separate, and therefore there is no certainty that the full amount of housing will be delivered.

In addition to this as the plan period has rolled on by 1 year, then so should the 500 dwellings for Tamworth. This would be 531 $(500/17) \times 18 = 531$

Are the completions and commitments monitoring information the most up to date? Does it go to 31 March 2014?

It is difficult to see how this relates to the 5 year housing supply, has there been a past under delivery? Should the amount required be increased to allow for a 5% or 20% buffer as required by the NPPF?

The quantum of housing to meet Tamworth's needs should be stated as a minimum throughout the Core Strategy.

Q5 Please set out what change(s) you consider necessary to make the Main Modifications legally compliant or sound, having regard to the test you have identified above. You will need to say why this change will make the Main Modifications 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

The table should be clear and concise. The figures should be updated to 31 March 2014.

a) Housing requirement	Total 3,681 (NWBC 3,150 + TBC 531)	Annual 205 (rounded up from 204.5)
b) Completions	151	
c) Commitments (permissions and LIP sites)	1,050	
d) Housing remaining to be delivered	$3,681 - 151 - 1,050 = \mathbf{2,480}$	

Has there been an under supply from previous years? This will need to be included in the table.