



FREEPOST RSLH-2YKJ-TYAZ
Stratford upon Avon District Council
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Stratford upon Avon
CV37 1LE

SENT BY E-MAIL AND POST

12 May 2016

Dear Sir / Madam

**STRATFORD UPON AVON DISTRICT CORE STRATEGY MAIN
MODIFICATIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments.

The HBF submitted representations to the Proposed Modifications consultation in September 2015 and participated in discussions at the resumed Examination Hearing Sessions held in January 2016 therefore the resultant increase in the housing requirement from 14,480 dwellings to at least 14,600 dwellings (**MM03** and **MM05**) and the re-calculation of the Council's 5 YHLS position as set out in the Inspector's Interim Paper are noted.

However it is observed that in the supporting text of **MM35** the Council refers to an agreement to meet an objectively assessed housing need (OAHN) of 3,750 – 3,800 dwellings per annum in the Coventry & Warwickshire Housing Market Area (C&W HMA). This reference is not representative of the latest position. The up dated Coventry & Warwickshire SHMA Report dated September 2015 identifies an OAHN of 4,277 dwellings per annum and the signed Memorandum of Understanding between the C&W HMA authorities dated October 2015 distributes 4,408 dwellings per annum including an additional 132 dwellings per annum to support economic growth in North Warwickshire and Stratford upon Avon from outside the C&W HMA (4,277 +

132 = 4,409). It is recommended that the supporting text of **MM35** is changed so there is no misunderstanding about the extent of OAHN in the C&W HMA and its future distribution. This change is necessary to ensure that **MM33** functions effectively in the future and OAHN, housing distribution and Reserve Sites in the Site Allocations Plan are appropriately dealt with. If **MM35** is not corrected the Core Strategy would be unsound for not been effective nor positively prepared. It is hoped that these further comments are helpful to both the Council and Inspector in informing the final stage of the Stratford upon Avon District Core Strategy. If any further assistance or information is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



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