

## Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

| For Office Use only: |  |
|----------------------|--|
| Date                 |  |
| Ref                  |  |

**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**  
(Additional Part B forms can be downloaded from the web page)

### 4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

MM65

### 5. Do support or object the proposed main modification?

Support

X

Object

### 6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

### 7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

### 8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

Justified

Effective

Consistent with National Planning Policy (the NPPF)

### 9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to a proposed main modification).

MM65 proposes a reduction in forecast jobs growth over the plan period and a new annual target of 1600 jobs, down from 2897 – a reduction of 45%. The stated reason for this modification is "To provide a clear indication of projected jobs growth rather than an aspirational figure".

This is a clear recognition that the employment projections contained in the CSPD were unrealistic and unduly aspirational. It is difficult to assess the validity of the new figure but ACS is prepared to accept it, and welcomes the statement that it is "non-aspirational".

HOWEVER it is noted that despite this significant reduction, the housing requirement figure for the plan period remains unchanged at 42,100. Whilst there are many factors influencing population and household growth, the availability of employment is clearly a key factor; this is recognised at (proposed

new) para 5.3.12 in the CSPD which states that the Housing Requirement Study used as a basis for the plan looked at 4 key factors influencing household growth, one of which is “the influence of projected economic and jobs growth on the number of new homes needed”.

It is totally unrealistic for the housing requirement to remain **exactly the same as the previous level** given a 45% reduction in one of the key influencing factors. (See representation on MM51)

**10. Please set out what changes you consider necessary to make the proposed main modifications legally compliant or sound, having regard to the test you have identified at Q7 above.**

**You need to say why this change will make the proposed main modification 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.**

**11.  
Signature:**

**Date:**

19<sup>th</sup> January 2016

**Thank you for taking the time to complete this Representation Form.**