

WARWICK DISTRICT COUNCIL LOCAL PLAN EXAMINATION

Statement in response to **Matter 1: The Duty to Co-operate** prepared by Barton Willmore (BW) on behalf of a Consortium of house builders and developers with land interests across the West Midlands, and specifically within the Coventry Housing Market Area. The Consortium includes (in alphabetical order):

- Bloor Homes Midlands;
- Bovis Homes;
- Crest Strategic Projects;
- Richborough Estates;
- Gladman Developments;
- Hallam Land;
- Kler Group;
- Taylor Wimpey UK Ltd;
- William Davis.

MATTER 1: THE DUTY TO CO-OPERATE

We respond to each question in turn below.

General

1) What are the genuinely strategic matters as defined by S33A(4) of the Planning and Compulsory Purchase Act?

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2) Who are the relevant local authorities and prescribed bodies in terms of cooperating on these strategic matters during the preparation of the Local Plan?

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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?

We believe that the HMA definition applied is appropriate, although we consider Stratford-on-Avon and North Warwickshire to also belong to the Birmingham 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?

According to the 2011 Census, Coventry is the main destination for commuters from the rest of the HMA, although flows in both directions between Warwick and Stratford-on-Avon are also strong. Warwick is the most popular out-commuting destination for Coventry residents in employment, with nearly twice as many out commuters travelling there (9,249) than to the next most significant destination (Nuneaton & Bedworth, 4,878). The largest flows into Coventry are from Nuneaton & Bedworth (11,392) and Warwick (7,903). Warwick can therefore be considered to have clear economic linkages with Coventry.

Warwick is also the most popular destination for out-migrants from Coventry, with a net out flow of 1,939 people in the year prior to the 2011 Census. Smaller net out-flows to Nuneaton and Bedworth (282) and Rugby (346) were also seen.

5) How do these interrelationships affect Warwick District specifically?

As clear linkages between Warwick and Coventry are evident, growth in these two authorities is inextricably linked. Coventry relies more heavily on labour from Warwick than from any other local authority, and owing to a shortage (or lack of choice) of housing in Coventry, workers are migrating to Warwick whilst retaining their jobs in the City.

It is highly likely that Coventry will be unable to meet its own housing needs. The full scale of unmet need from Coventry therefore needs to be robustly quantified (based on a robust OAN), as this will inevitably impact on the amount of housing Warwick and other districts in the HMA need to plan for.

6) When did co-operation with other authorities on overall housing provision within the HMA begin?

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7) What form has co-operation taken? Has it been ongoing during the preparation of the Local Plan?

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- 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?**

It is clear from LP22 (paragraph 5.2.8) that whilst there is agreement between the authorities of the minimum OAN of 4,000 dpa, this figure now falls short of the CLG 'starting point' which we calculate to total 4,079 dpa, and as we detail in our Matter 2 statement falls significantly short of that required to address market signals issues, or meet LEP job growth requirements.

However, it is also clear from LP22 that at the present time and even on the basis of 4,000 dpa there remains 234dpa of unmet need across the HMA which has yet to be allocated.

- 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.?**

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- 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?**

Yes – even on the basis of 4,000 dpa there remains 234dpa of unmet need across the HMA according to LP22. On the basis of our OAN of c. 5,000 dpa, we believe that the scale of unmet need is likely to be significantly higher than this.

- 11) What are the issues as far as Warwick District is concerned in addressing unmet needs from other authorities i.e. Coventry?**

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- 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?**

It is clear that Birmingham City is unable to meet its housing needs, and in the first instance it will be the responsibility of those other authorities in the Birmingham housing market area to meet those unmet needs (including Stratford-on-Avon and North Warwickshire). However in the event that these authorities are unable to pick up this need then this will inevitably

place increased pressure on the local housing markets of surrounding authorities including Warwick. The effect of this could be to increase housing demand within these locations, and worsen existing affordability issues.

Whilst the Inspector is yet to issue his final report on Birmingham's full OAN, the Council's consultants conceded at the examination that this totals 89,000 dwellings, which compares with planned provision of 51,100 dwellings. Birmingham's unmet need will therefore amount to at least 37,900 dwellings.

13) Has the issue of unmet need within the HMA or beyond been addressed and resolved?

No – we believe that the council's OAN figure of c. 4,000dpa for the HMA underestimates likely growth, and therefore underestimates unmet need. Until the full amount of unmet need is robustly quantified, agreed and distributed, the issue cannot be considered to be addressed and resolved.

14) How does the Local Plan deal with the issue? Is this an appropriate approach?

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15) What are the implications for compliance with the duty to co-operate of not addressing this issue at this stage? -

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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?

In the first instance we consider that the HMA authorities need to identify the full OAN of the HMA which ensures a true balance between the labour force growth and the LEP's job growth requirements. We consider that need to total 5,005 dpa. We make further comments on this issue in our Matter 2 Hearing Statement and associated addendum report.

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?

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Other matters requiring co-operation

For each of the other strategic matters:

18) What are the particular issues?

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19) Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?

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20) In overall terms has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

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21) Are there cross boundary issues in relation to any of the proposed site allocations such as transport or other infrastructure requirements?

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