

8 Church Lees
Bishop's Tachbrook
CV33 9RQ

Mr K Ward & Mr I Kemp
49 All Saints Place
Bromsgrove
B61 0AX

27th March 2015

Dear Mr Ward and Mr Kemp,

Warwick District New Local Plan 2011-2029 Examination in Public

I am concerned that the New Local Plan is neither justified nor consistent with national policy, and I would like to present this to you at the initial hearing.

The evidence base – the Coventry and Warwickshire Joint SHMA – the foundation upon which the overall housing number is predicated and which determines the sites needed for development, is significantly different to the sub-regional distribution proposed by the DCLG's own housing projections. Furthermore, there are further inconsistencies within the tables and chapters of that Coventry & Warwickshire Joint SHMA which affect the projections for Warwick District disproportionately – the Household Headship ratio and the mix of dwellings (both type and tenure) show logical inconsistencies.

The resulting planning issue is the leap-frogging of development from the city of Coventry to the Warwickshire countryside outside the West Midlands Greenbelt, nine miles or more from where it is needed. If development is required at Coventry, as indicated by the ONS figures, then the right place for development is within or adjacent to Coventry.

The Coventry & Warwickshire Joint SHMA has provided dubious foundations for the local plans and core strategies of this sub-region with a different distribution in housing to the ONS and whose chapters and tables reveal worrying inconsistencies.

The Appendix attached provides greater detail of the planning technicalities. I trust you will look favourably upon my request to participate in the initial hearing.

Yours sincerely,



Cllr Richard Brookes

cc:

Clerk and Chairman of Bishop's Tachbrook Parish Council

Appendix A

A1 Cov. & Warks. Joint SHMA v ONS population forecasts – discrepancy of distribution

Shortly after publication of WDC's Draft Local Plan, on 29 May 2014, the ONS published the latest projections for population growth. This projects a population change over the plan period 2011-29 is 15300 (16700 for 2011-31). This is a substantial difference to the GLHearn Coventry & Warwickshire Joint SHMA (CWJSHMA) report, which was published in November 2013. The CWJSHMA shows at Table 50 under PROJ1A a projection of 23800 from 2011-31 for Warwick District. Pro rata the CWJSHMA is 21400 over the 2011-2029 plan period for Warwick District. The CWJSHMA appears to have over-forecast by 40% of the 29 May 2014 ONS projections. This discrepancy persists in the most recent 10 March 2015 ONS projections. Table 2 below shows this difference in population predictions.

Table 2 CWJSHMA and ONS population changes by LPA in Coventry & Warwickshire

Figure 2: Population growth in the SHMA and 2012-based SNPP (2011-31)

	SHMA	2012-based SNPP	Difference
Coventry	48,760	84,144	35,384
North Warwickshire	4,527	3,782	-746
Nuneaton & Bedworth	18,202	13,189	-5,014
Rugby	26,346	15,647	-10,699
Stratford-on-Avon	15,960	10,683	-5,277
Warwick	23,858	16,754	-7,104
HMA	137,653	144,198	6,546

Source: ONS/ JGC

Notable from Table 2 above is that compared to the ONS, the CWJSHMA significantly under-predicts population growth associated with the city of Coventry, and significantly over-predicts the population change in the shire districts and boroughs. This translates into an under-provision of new dwellings for Coventry and an over-provision in the Warwickshire districts, as shown in Table 6 below.

Figure 6: Estimated Housing Need per Annum – Alternative Demographic-Led Scenarios

Housing Need per Annum	SNPP_Adj (SHMA core output)	Final SHMA conclusion	2012-based SNPP	Part return to trend
Coventry	1,179	1,180	1,885	1,811
North Warwickshire	165	175	159	204
Nuneaton & Bedworth	494	495	394	422
Rugby	658	660	441	453
Stratford-on-Avon	538	570	463	508
Warwick	718	720	564	606
TOTAL (HMA)	3,753	3,800	3,906	4,004

The ONS predictions show that compared to the CWJSHMA more housing is required in Coventry and less in the Warwickshire LPAs. Expressed as a yearly figure, this is 564 dwellings per annum rather than the 720 of the CWJSHMA for Warwick District, and this has important consequences for the 5-year Housing Land Supply.

A2 Inconsistent logic between HHR and mix of dwelling type and tenures

The CWJSHMA compounds this error for Warwick District by using a Household Headship Ratio (HHR) based upon trend data, without reflecting on the implications of this when compared to the Affordable and Market Housing mixes as shown elsewhere in the CWJSHMA at Tables 79 and 80. The last row of Table 50 of the CWJSHMA reveals an HHR of 1.66 people per new dwelling. However, for this to be realistic, it would require that either

- a) most of the new Market Housing would be occupied each by an average of 1 person (see Table A below), or

Table A

%Affordable	40%	type	proportion	pph	pph cumulative
Affordable	40%	1-bed	35%	1.0	0.14
	40%	2-bed	30%	2.5	0.30
	40%	3-bed	30%	3.5	0.42
	40%	4+bed	5%	4.5	0.09
Market	60%	1-bed	10%	1.0	0.06
	60%	2-bed	30%	1.0	0.18
	60%	3-bed	40%	1.0	0.24
	60%	4+bed	20%	1.9	0.23
				TOTAL pph	1.66

- b) that the affordable housing is under-occupied compared to the market housing (see Table B next page).

Table B

%Affordable	40%	type	proportion	pph	pph cumulative
Affordable	40%	1-bed	35%	1.0	0.14
	40%	2-bed	30%	1.0	0.12
	40%	3-bed	30%	1.5	0.18
	40%	4+bed	5%	2.5	0.05
Market	60%	1-bed	10%	1.0	0.06
	60%	2-bed	30%	1.5	0.27
	60%	3-bed	40%	2.0	0.48
	60%	4+bed	20%	3.0	0.36
				TOTAL pph	1.66

The former is surely unlikely, given that the cost of a modest new 3-bedroom dwelling is £340,000; the latter is surely unlikely in the context of the Government's abolition of the Spare Bedroom Subsidy. Table C below shows that 2.1 is a realistic HHR for new dwellings. In terms of the CWJSHMA, this means that either the HHR are too low for the new dwellings, or that the proposed mix of new dwellings should be skewed more towards 1-bed or 2-bed dwellings – from the CWJSHMA's 50% 1- & 2-bed towards over 70%.

Table C

%Affordable	40%	type	proportion	pph	pph cumulative
Affordable	40%	1-bed	0.35	1.00	0.14
	40%	2-bed	0.30	2.50	0.30
	40%	3-bed	0.30	3.50	0.42
	40%	4+bed	0.05	4.50	0.09
Market	60%	1-bed	0.10	1.00	0.06
	60%	2-bed	0.30	1.50	0.27
	60%	3-bed	0.40	2.00	0.48
	60%	4+bed	0.20	3.00	0.36
				TOTAL pph	2.12

At the more realistic value of HHR of 2.1, this means that the housing requirement in the 2011-2029 plan period for the CWJSHMA Warwick District population figures of 21400 is 10,200, not 12,960 dwellings. Expressed as a yearly figure, this is 567 dwellings per annum rather than the 720 of the CWJSHMA for Warwick District, and this has important consequences for the 5-year Housing Land Supply too.

Although this was presented for officers to consider (I responded with this table to the Publication Draft Local Plan), the point made was ignored.

A3 Leap-frogging the Greenbelt away from the City

As a consequence of the distribution advocated by the CWJSHMA, development that should be taking place within or adjacent to Coventry is leap-frogging the West Midlands Greenbelt to the countryside beyond, over 14km (9 miles) from where it is needed. The extract below, from the emerging local plan shows sites for development (hatched yellow) principally as an urban extension of Warwick and Whitnash, on green fields outside the Greenbelt (hatched green) remote from the city of Coventry. This is not justified by the evidence base discussed in points A1 and A2 above. Furthermore, it has to be questioned if this is sustainable development if the need is nine miles away or more in Coventry.

Extract 1 Emerging Local Plan District Policies Map

