

Warwick District Local Plan Topic Paper

The Housing Requirement

June2016



Introduction

- 1 This Topic Paper has been written to support and justify the approach taken by Warwick District Council in preparing modifications to the submitted Local Plan. The modifications seek to directly address the Inspector's initial findings with regard to the Local Plan's housing requirement and specifically with regard to unmet need arising in Coventry. It should be read in conjunction with a number of other documents which form part of the Council's evidence base to support the Local Plan. The documents are referred to within the text of the document below.
- 2 Warwick District Council submitted its New Local Plan in January 2015. In May 2015, 5 days of initial hearings were held to explore issues around the Duty to Cooperate, the overall level of housing provided and the five year housing supply.
- 3 On 1st June 2015 the Inspector wrote to the Council indicating that he believed the plan was unsound for a number of reasons including, importantly, in respect of the overall housing requirement.
- 4 Specifically, the inspector identified issues about the housing requirement as follows:
 - The Housing Market Area's (HMA) Objectively Assessed Need (OAN): Whilst he considered the 2014 Joint SHMA Addendum to be a robust assessment and considered its conclusion that 4004 dwellings per annum (dpa) as a minimum OAN for the HMA was based on "reasonable assumptions", he did emphasise that this should be viewed as minimum.
 - Coventry's Unmet Need: he highlighted emerging evidence that Coventry was likely to have a substantial level of unmet housing need that would need to be accommodated elsewhere
 - Whilst acknowledging that the submitted Local Plan sought to address some of this unmet need, he took the view that the remaining unmet need was not insignificant (particularly in the context of the HMA's OAN being a minimum) and that this should be addressed. He also highlighted the lack of analysis as to the contribution each authority should make to addressing the unmet need, arguing that there was no basis for 114dpa being the correct redistribution to Warwick and highlighting the absence of a strategy to meet OAN for the HMA in full.
- 5 This Topic Paper has been prepared to outline the approach taken by Warwick District Council in preparing these modifications.

- 6 The Coventry and Warwickshire Joint SHMA 2013 (Doc HO04) provides further information on the demographic profile of Coventry and Warwickshire and each of the Districts within the HMA. Further updates are also included within the Joint SHMA Addendum 2014 (Doc HO08) and the Updated Assessment of Housing Need (2015) (Doc HO20PM).

The Submitted Draft Local Plan - January 2015

- 7 The Local Plan submitted in January 2015 set out a housing requirement of 714 dwellings per annum between 2011 and 2029. This requirement encompassed an OAN for the District of 606dpa and a contribution towards Coventry's unmet housing need of 108dpa.
- 8 Warwick's OAN figure was based on the findings of the September 2014 Joint SHMA Addendum (Doc HO08). This Addendum updated the 2013 Joint SHMA (Doc HO04) to take account of:
 - a. 2012-based sub national population projections (published in May 2014) and
 - b. The potential implications of different levels of employment growth on housing provision in the HMA in line with the Planning Practice Guidance (PPG).
- 9 In his letter of 1st June 2015, the Local Plan Inspector acknowledged that this Addendum is based on "reasonable assumptions" in identifying a minimum figure of 4004dpa as the OAN for the HMA. This "part return to trend" scenario identified a demographically based housing need of 1811dpa for Coventry and 606dpa for Warwick District (see fig 6 on page 12).
- 10 The Addendum report (Doc HO08) then goes on to consider how economic growth may influence demographic changes in Section 3 and to consider other factors including the evidence of affordable housing need and market signals (Section 4).
- 11 Specifically, section 3 considers two sets of forecasts – Experian forecasts from May 2013 (which formed the basis for the economic analysis in the 2013 Joint SHMA (Doc HO04) and Cambridge Econometrics forecasts from August 2013 (which were used by the LEP). The conclusions for housing provision arising from these two projections are set out in fig 11 (page 19) and fig 12 (page 20). This shows that, using the 2013 Experian Forecasts, the housing need for Warwick District would be just over 600dpa (broadly in line with demographic projections), but that the total housing need for the HMA would, at 3,636dpa, be substantially below the minimum requirement of 4004dpa, due to a significantly reduced need arising from Coventry. The Cambridge Econometrics projections show a different picture with upwards pressure for the Warwickshire authorities, particularly in Stratford-on-Avon and Warwick. This

forecast would give rise to a housing need of over 4500dpa for the HMA and over 800dpa for Warwick District.

- 12 Section 4 of the Addendum revisits the market signals analysis undertaken in the 2013 Joint SHMA (Doc HO04). The “part return to trend” scenario underpins the demographic-based conclusions. This scenario includes assumptions about a partial return to headship rates in the 2008-based household projections. The Addendum also explores the implications of a full return to 2008 headship rates for the 24-35 age groups as a sensitivity analysis. This scenario shows a small upwards pressure for growth in Warwick District of around 50dpa(see figs 14 and 15 on page 26). The report recognises that it is difficult to forecast future household formation amongst younger households due to the complexity of factors which may influence future trends. The report therefore recommends that there should be either an upwards adjustment or a recognition that the housing need in fig. 6 is a minimum or a clear monitoring mechanism put in place.
- 13 The conclusions from this are:
 - a. 4004dpa is a minimum figure for the HMA
 - b. There is considerable uncertainty regarding the need for market signal uplifts beyond the 4004dpa and so careful monitoring should be undertaken.
 - c. Employment forecasts indicate a range of possible outcomes with 4004dpa being sufficient to accommodate the need arising from Experian forecasts but insufficient to accommodate need associated with Cambridge Econometric forecasts. This further underlines the need to treat 4004dpa as a minimum.
- 14 These outcomes provided the evidence for an agreement between the local planning authorities within the HMA in November 2014 as set out in Doc LP20. This agreement sought to establish 4004dpa as the OAN for the HMA and to agree an initial distribution of unmet need arising from Coventry to the Warwickshire Authorities. The agreement left a shortfall of 234dpa to be addressed through a future Joint Core Strategy or coordinated plan reviews to be complete by 2019. A timetable to achieve this was included within the agreement. The agreement also set out a clear monitoring mechanism as suggested by the Joint SHMA Addendum.
- 15 This agreement formed the basis of the LocalPlan submitted by WDC in January 2015. This proposed a housing requirement of 714dpa between 2011 and 2029.

Overall Housing Need - Updated Evidence

- 16 As set out in his letter of 1st June 2015 (see para 4 above), the Local Plan Inspector has found the approach endorsed by the November

2014 agreement (Doc LP20) and incorporated in the submitted Draft Local Plan to be unsound.

- 17 As a result the Coventry and Warwickshire Authorities have embarked on a process to address the concerns raised by the Inspector to enable each authority's Local Plan to progress. The starting point for this was a further update of the evidence. To this end, GL Hearn was commissioned to undertake an "Updated Assessment of Housing Need for Coventry and Warwickshire" (Doc HO20PM). This report was published in September 2015. In particular this report considered the implications of:
 - a. The 2012-based Household Projections published in February 2015
 - b. Updated economic forecasts from Cambridge Econometrics (dated March 2015)
- 18 The report also updated the assessment of market signals and revisited the affordable housing need assessment in light of Planning Practice Guidance.
- 19 In terms of the HMA's overall housing need, the report identifies an **OAN of 4,272dpa for the HMA** (see fig 60 on page 127) - an increase of 268dpa (7%) in comparison with the 2014 SHMA Addendum. The demographic driven projection indicates a need for 4,197dpa. However, the report suggests that there is evidence to warrant a further adjustment of 75dpa to improve affordability (see table 51 on page 126). The report concludes that there is no evidence at the HMA level to support an economic uplift. Tables 23, 24 and 26 (pages 69 and 70) show the number of dwellings required based on three economically-driven projections. As set out in table 28 (on page 77), the housing implications of these projections can be accommodated within the HMA's demographically driven projections.
- 20 In terms of Warwick District's overall housing need, the report identifies an **OAN of 600dpa for Warwick District** which aligns very closely to the OAN identified in the 2014 SHMA Addendum. In reaching a conclusion on the District's OAN, the report considers the need for an employment uplift, the implications of market signals and the District's affordable housing need. These issues are covered in more detail below.
- 21 **What is Warwick District's Demographic Based Housing Need?**
The Updated Housing Needs Assessment (Doc HO20PM) takes account of the 2012-based Household Projections. The report examines the components of population change in Coventry and Warwickshire. Section 3 of the report therefore looks at natural change, migration (internal and international), unattributable population changes (concluding in para 3.55 that an adjustment for UPC is not appropriate) and 10 year migration trends (as an

alternative to the 5 year migration data used in the Sub-National Population Projections). Table 11 (page 47) shows the outputs from the sensitivity analysis of these variables for the HMA and Fig. 25 (page 48) shows how these impact on Warwick District. In all cases, except the variable for ten year migration trends, these sensitivity tests suggest a lower level of population growth for the District than indicated by the 2012-based Sub-National Population Projections. Having done this analysis, the report concludes (in para 3.67) that “the 2012-based Sub-National Population Projections remains a sound demographic projection for testing the population growth (and ultimately the housing need)”. It considers the sensitivity scenarios broadly confirm this. Fig. 31 (page 56) draws this together to show an annual housing need of 600dpa for Warwick District based on the 2012 Sub-National Population Projections.

22 The report considers that the headship rates from the 2012-based Household Projections provide a robust starting point for considering housing need, but recognises an interaction between improving affordability and household formation amongst younger households.

23 Should the demographic need be adjusted to reflect economic growth forecasts? The report identifies some uncertainty regarding the jobs forecasts for the period 2011-2013 (as shown by paras 4.2 to 4.17). It includes a comparison of economic forecasts looking forwards, considering 2 sets of forecasts from Cambridge Econometrics; together with a set from Experian. For Warwick District, the models identify jobs growth between 2014 and 2031 in the range 8,105 (Experian) to 11,544 (CE 2013). Adjusting these jobs figures to identify a change in resident workforce indicates a change in resident workforce for Warwick District in the range of 7,023 (Experian) to 10,002 (CE 2013). This enables economic driven housing projections to be derived. For Warwick District this is the range 549dpa (Experian) to 648dpa (CE 2013). However as the 2013 CE data has effectively been superseded by the 2015 projections, the realistic range for Warwick District is 549 to 602dpa (see para 4.42). The report brings together analysis of the forecasts with wider evidence on economic performance/ potential in drawing conclusions (Paras 4.50 – 4.66). It concludes that employment growth of 63,800 can be expected across the HMA between 2011-31, of which 9,100 can be expected in Warwick District. In conclusion, Table 28 indicates an economic driven housing need for 3,730dpa across the HMA and of 600dpa in Warwick District. The economic-driven need for the District aligns directly with the demographic need and therefore indicates that no further adjustment is required.

24 **Should the demographic need be adjusted to reflect market signals?** In section 5 the report analyses a range of market signals in line with the PPG, including house prices, sales, rents and

affordability factors. It concludes for Warwick District (in table 31, page 88) that:

- a. House prices and rents are above the national and regional average. There is evidence of above inflation rental growth since 2011. House prices since 2008 have remained stable in real terms.
- b. A Lower Quartile affordability ratio of 7.8 which is above HMA and national averages, but evidence that affordability has improved and the ratio has fallen modestly over the last decade.

Analysis in Appendix A of the report shows that for Warwick District the demographic forecast (600dpa) effectively builds in an allowance for improved affordability by allowing for improvement to household formation amongst younger households in their 20s and 30s. The report therefore concludes that for Warwick District, there is a need to improve affordability but that the 600dpa already accounts for this. No further uplift is therefore justified.

- 25 **Should the demographic need be adjusted to enable the provision of sufficient affordable housing?** The report considers the need for affordable housing in Section 6. The District's affordable housing need is covered further later in this paper (see paras 40 to 46). However, in considering the overall housing need for the District, it is important to consider whether an uplift is required to support delivery of affordable housing.
- 26 The Updated Assessment of Housing Need Report identifies a need for 280 affordable homes per year (Table 43), which represents 47% of the demographically-based need. It identifies that some adjustment to overall housing provision might be appropriate to enhance the delivery of affordable housing (Para 6.59).
- 27 However it is clear that the affordable needs modelling includes needs arising from both existing and newly-forming households. Not all of the households considered as having an affordable need would result in an overall need for additional housing overall.
- 28 The Report identifies that additional needs would principally arise from concealed and homeless households; and that meeting the needs of these would be manifest in increasing household formation rates. In the case of Warwick District, the detailed interrogation of the data indicated that the household projections already assume improved household formation amongst younger households and to include further adjustments would introduce double-counting.
- 29 Further consideration of the ability of the plan to meet the identified affordable housing need is set out later in this report (paras 40 to 46)

The Coventry and Warwickshire Housing Memorandum of Understanding

- 30 At its meeting on the 29th September 2015 the Coventry and Warwickshire Joint Committee for Economic Growth and Prosperity (WJCEGP) considered a Housing Memorandum of Understanding (HMoU) (Doc HO21PM) to ensure the housing needs of the HMA are met in full. The HMoU was agreed by the Leaders of Coventry CC, Warwick DC, Warwickshire CC, Rugby BC, North Warwickshire BC and Stratford-on-Avon DC. It was not agreed to by the Leader of Nuneaton and Bedworth BC. For Warwick District, the implication of the HMoU is to increase the District's Housing Requirement from 12,860 dwellings between 2011 and 2029 (as set out in the submitted Local Plan) to 16,776 dwellings.
- 31 The HMoU provides a shared agreement that the Housing Need of the HMA is 85,540 dwellings between 2011 to 2031 in line with para 18 above. This compares with a minimum figure of 80,000 dwellings identified in the 2014 Joint SHMA Update. It should be noted that due to uplifts in Stratford District and North Warwickshire to balance housing with employment forecasts, the sum total of the need of the 6 City/Borough/District Council areas is 88,160 dwellings. This is set out in the HMoU.
- 32 The Updated Assessment of Housing Need (Doc HO20PM) identifies an OAN for Coventry of 2,120 dwellings per annum (or 42,400 dwellings between 2011 and 2031). There is clear evidence that Coventry is unable to meet its housing need in full within the City boundary. Coventry City Council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) during the summer of 2015 using a jointly agreed methodology. This focuses strongly on brownfield sites within the City (which combined with completions since 2011 provides for 17,500 dwellings) and identifies capacity for just over 7,100 dwellings on greenfield sites within the City's Green Belt. In total, the assessment indicates that the City has capacity for 24,600 to 25,000 dwellings.
- 33 The consequence of this is that the City has a shortfall of 17,800 dwellings between 2011 and 2031. The authorities that have agreed the HMoU are committed to ensuring the HMA's housing requirement is being planned for in full, including Coventry's unmet need.
- 34 The HMoU seeks to provide a rational and fair redistribution of Coventry's unmet need to the Warwickshire Councils. The approach set out in the HMoU is based on an objective methodology that was developed by all of the Councils in the HMA. Further detail regarding this methodology is set out in the covering report to the meeting of the CWJCEGP on 29th September (see Doc HO31PM). Essentially, the agreed approach considers the functional relationship each District has with the City by looking at two-way commuting flows and

migration patterns. From this, conclusions have been reached regarding the percentage of unmet need that should be accommodated in each of the Warwickshire Districts. This methodology indicated that just over 37% of the shortfall should be accommodated in Warwick District. This amounts to 6,640 dwellings between 2011 and 2031 or 332dpa. The table below shows how this impacts on Warwick District's housing requirement during the Plan Period:

	Warwick District Objectively Assessed Need (dpa)	Portion of Coventry's unmet need to be met in Warwick District (dpa)	Total annual requirement (dpa)	Total Requirement for Local Plan Period (2011 to 2029)
Submitted Local Plan (Jan 2015)	606	108	714	12,860
HMoU (Sept 2015)	600	332	932	16,776
Change	-6	+224	+218	+3,916

- 35 As well as setting out housing need and the proposed redistribution of the unmet need, the HMoU aims to ensure consistency and enables the HMoU to be reviewed in certain circumstances. This includes a commitment by each authority to prepare a Local Plan that reflects the HMoU. This is important in demonstrating a shared and ongoing commitment to plan-making and avoiding a piecemeal approach to development.
- 36 Nuneaton and Bedworth Borough Council have declared that they are unable to agree the HMoU at present. This is because at the time of preparing this paper, they have not yet completed work on their SHLAA and so do not know the borough's housing capacity. A draft SHLAA has now been prepared, which has identified some additional land with the potential to contribute towards Coventry's unmet need. However, the SHLAA is still not finalised and has not been published. Therefore NBBC's final position is currently unconfirmed.
- 37 Despite some ongoing uncertainty regarding the capacity of Nuneaton and Bedworth to accommodate unmet need, Warwick District Council, along with the other signatories, is clear that the HMoU provides a sound and effective basis for meeting the HMA's housing need in full. The Council has therefore committed to a **housing requirement of 932dpa** between 2011 and 2029. This is made up of a District OAN of 600dpa (see para 19-23 above) and a contribution of 332dpa towards Coventry's unmet housing need.

Modifications to the Local Plan's Housing Requirement

- 38 The position set out in the HMoU is reflected in the Local Plan modifications agreed by Council on 24th February 2016 as follows:

- Mod 1: Policy DS2 is amended to clarify that the Council is committed to meeting agreed needs arising outside the District
- Mod 2: this provides an explanation for the modifications to Policy DS2, making specific reference to the HMoU
- Mod 4: Policy DS6 is amended to commit to 16,776 new homes between 2011 and 2029.
- Mod 5: this provides an explanation for the modifications to Policy DS6, recognising that part of the housing requirement reflects Coventry's unmet need. It also explains that the proposed housing requirement is a minimum.

39 These modifications have been put forward to ensure the Local Plan contains a clear commitment to provide for a level of housing that aligns with the HMoU. The modifications provide the context for a number of other modifications relating to the supply of housing, the broad location of sites and the allocation and delivery of sites. These modifications enable the Plan to take full account of the latest evidence regarding the HMA's and the District's housing need. They also address one of the main issues identified by the Inspector in his initial findings.

Affordable Housing Need

- 40 The 2013 Joint SHMA (Doc HO04) identified an affordable housing need for Warwick of 268dpa (see table 68 on page 138). This document provided the basis for the affordable housing policies set out in the submitted Draft Local Plan (see Policies H2 and H3)
- 41 However, the Joint SHMA was prepared prior to the publication of the PPG. The Coventry and Warwickshire authorities therefore asked GL Hearn to undertake a review of affordable housing need as part of the 2015 Updated Assessment of Housing Need (Doc HO20PM).
- 42 Section 6 of the Updated Assessment of Housing Need provides a full, PPG compliant assessment of affordable housing need for the HMA as a whole and for each district within the HMA.
- 43 Table 43 (on page 107) shows the estimated annual level of affordable housing need for the HMA and each authority. It suggests an annual need of 1,462dpa for the HMA and 280dpa for Warwick District.
- 44 It is important to understand that the redistribution of housing within the HMA agreed through HMoU will influence future delivery of affordable housing in Warwick District.
- 45 The Council has therefore considered affordable housing delivery further in the context of the overall housing requirement (932dpa), taking account of the advice in the GL Hearn Report. Appendix A of this paper sets out a rough but practical assessment of how

affordable housing need could be applied to the portion of the overall housing requirement that has been reattributed from Coventry. Appendix A recognises that the approach is simplistic whilst providing a reasonable guide for considering an adjustment. The approach demonstrates that with a formal agreement between the District and City councils regarding nomination rights, the total affordable housing need for the District equates to around 40% of the adjusted housing requirement. This is line with Policy H2 of the Draft Local Plan. Recent planning permissions have demonstrated that this percentage of affordable housing remains viable in the District. This would enable delivery of potentially over 370 affordable homes per year, compared to the need for 280 per year. The District's affordable housing need would therefore be met in full by the Plan.

- 46 The final part of Section 6 the 2015 Updated Assessment of Housing Need (Doc HO20PM) explores the need for different types of affordable housing such as intermediate housing, affordable rent and social rent. Table 55 on page 114 shows that for Warwick District, the annual need can be split between a need for 40dpa (14%) for intermediate housing and 240dpa (86%) for social/affordable rent.

G&T Housing Need

- 47 In November 2012, the Council published its Gypsy and Traveller Accommodation Assessment (Doc HO19). The research was carried out by the Housing & Urban Studies Unit of the University of Salford and spanned the period 2012 – 2026.
- 48 The findings of the research showed that there is a need for 31 permanent pitches and a transit site of 6-8 pitches in Warwick District. There is no current provision within the district, so this reflects historic need, current need and future requirement based on evidence gathered and household formation statistics.
- 49 The GTAA also looked at the need for any additional plots for Travelling Showpeople, to augment the four that exist in the district, but no additional need was demonstrated.
- 50 In 2015 additional advice was obtained from the consultants in view of inconsistencies in timescales with the Plan period and the changes the government made to the definition of Gypsies and Travellers, (reflecting the requirement to allocate sites only for those who practice a fully itinerant lifestyle). This advice takes the form of an additional note, "Advice for Warwick District Council on household formation relating to Gypsy and Traveller pitches" (Doc HO30PM), in which the time period has been extended to 2029 to match that of the Local Plan. Taking into account the likely % increase in household formation over that additional period, the need has been estimated to be between 30 and 33 pitches. Based on this evidence, it has been

decided that the 31 pitch requirement previously identified, will adequately serve the district's need and therefore the figures remain the same but the time period over which they will be provided has been extended to match that of the Local Plan.

DRAFT Affordable Housing Memorandum of Understanding**MAY 2016****POINTS OF AGREEMENT**

- 1 This Affordable Housing MoU (AHMoU) relates to the Housing MoU (HMoU) agreed by both parties in 2015. This AHMoU therefore needs to be read in conjunction with the HMoU and in particular with following points of agreements
 - Coventry Objectively Assessed Housing Need is 2,120 dpa
 - Warwick Objectively Assessed Housing Need is 600 dpa
 - Coventry is not able to meet its OAN within the City boundary
 - Warwick will accommodate 332dpa towards Coventry's unmet need.
- 2 The "Updated Assessment of Housing: Coventry-Warwickshire HMA" prepared by GL Hearn and published in September 2015 provides robust evidence base in relation to affordable housing need across the HMA and for each Council area within the HMA
- 3 The parties will continue to work with all the local authorities within the HMA to ensure affordable housing need across the HMA is understood and is being met. The mechanism for achieving this will vary between authorities.
- 4 The parties recognise that, because part of Coventry's overall housing need will be met within Warwick District, there is a justification for a parallel redistribution of affordable housing need.
- 5 The parties recognise that the relationship between affordable housing need and the overall housing need is complex and that any formulaic redistribution is likely to have limitations. As a consequence, the parties recognise that the table set out below provides only an initial indication of how affordable housing could be redistributed and as such it is a useful guide. Its limitations need to be understood as follows:
 - The affordable housing need is based on significantly different assumptions about the meaning of "need" in comparison with Objectively Assessed Housing Need. As a result, there is not a direct relationship between the two and undertaking a redistribution on a proportional basis will inevitably contain inaccuracies.
 - Affordable housing need includes elements that relate to the needs of existing households in the area. Therefore providing part of the overall housing need outside the City will lead to a relocation of some existing households in the City with affordable housing needs.
 - There is an element of judgement involved in how affordable housing needs are met. Due to the different circumstances of Warwick and Coventry, it is not possible to apply the same judgements to each area.
- 6 Notwithstanding the limitations of the calculations set out below, the parties agree that it provides a useful guide as to how affordable housing requirements should be redistributed between Coventry and Warwick and are committed to using the calculations to justify the application of planning policies and the approach to affordable housing nominations.
- 7 The parties recognise that nomination rights to affordable housing between the two areas is complex and will need a detailed review to reflect the proposed redistribution of affordable

housing set out in the calculations below. A commitment to this end is noted in draft policy DS2 of the Coventry City Council Local Plan submission draft.

- 8 The parties recognise that the Housing and Planning Bill, once enacted, is likely to change affordable housing need in Coventry and Warwickshire. As a result, both Councils are committed to reviewing Affordable Housing Need once the Bill is enacted. It is agreed that in that event, the redistribution guide below will be reviewed.
- 9 The calculation of Affordable Housing Redistribution between Coventry and Warwick is set out in table 1 below:

Table 1

		CCC	WDC
A	Total OAN (excluding economic uplift) (Per Annum)	2120	600
B	Affordable Housing Need (Per Annum)	600	280
C	% of OAN that is affordable	28.3%	47%
D	Coventry unmet housing need to be met in Warwick (Per Annum)		332
E	Coventry % of OAN that is affordable		28.3%
F	Coventry Affordable Housing Need to be met in Warwick (Per Annum)		94
G	Total Affordable Housing Requirement for Warwick (Per Annum) (B+F)		374
H	Total Housing Requirement(Per Annum) (A+D)		932
I	% of overall requirement that is affordable		40%

- 10 Warwick District Council has prepared a Local Plan that includes proposals and policy to deliver the relevant affordable housing requirement set out in table 1 above. Coventry City Council have, as a result of the redistribution methodology agreed through the HMoU, identified a proportionate approach to affordable housing delivery which will see the city deliver 348 affordable homes per annum (28.3% of its total housing requirement identified in the HMoU).

LIMITATIONS

For the avoidance of doubt, this Memorandum shall not fetter the discretion of any of the Councils in the determination of any planning application, or in the exercise of any of their statutory powers and duties, or in their response to consultations, and is not intended to be legally binding but shows clear commitment and intent to meeting the full housing needs of the market area.

LIAISON

Planning Policy and Housing Strategy Officers from each Council will meet on an annual basis or more frequently when appropriate, in order to;

- Monitor and review the effectiveness of the memorandum
- Prepare recommendations for amendments to the memorandum as necessary

TIMESCALE

The Memorandum of Understanding is intended to run up to 2031 to align with the timescale of the evidence.

REVIEW

The document will be reviewed no less than every three years but will be reviewed when new evidence, that renders this AHMOU out of date, emerges.