

PART A

Note on Bishops Tachbrook Parish Council's Matter 3 Statement regarding inclusion of planning permissions within the Housing Supply

1. WDC has found the statement and appendices difficult to follow making it hard to respond to full detail. For instance,
 - a. the Statement incorrectly makes suggests that WDC's Housing Trajectory (Appendix 1 of the Housing Supply Topic Paper) does not calculate accurately
 - b. BTPC appear to have used completions data accessed from an FOI request made by CPRE in August 2016. This data was provided in response to a request about the data used in relation to the Council 5 year housing supply assessment undertaken in March 2016. BTPC seem to have misinterpreted this as also providing a full picture on commitments, which it does not. Whilst previous and existing commitments are contained within the data provided, records (sites) are dependent on having at least one completion in a particular year. This would omit many sites that have not started or under construction. Essentially it forms no basis to understand commitments – only completions.
 - c. The BTPC Appendix 1 is very detailed, but is confusing and is not easy to filter because colours are used. If BTPC consider errors have been made by the Council, a more helpful approach would have been to simply examine WDC housing trajectory (June 2016) and highlighted where there are errors or omissions by providing a supplemental list of sites that WDC do not have identified.
 - d. It appears that some parts of BTPC's Appendix 1 are based on a misunderstanding of the planning system as the application numbers referred to are for condition variations, or different stages of the planning process. In reality these site have been picked up the Council and are included in the completions data, albeit a different application number may be used.
2. It is claimed that WDC's Housing Trajectory (June 2016) does not take account of all data sources and only takes account of data up to March 2016. However, whilst it is hard to follow exactly what BTPC have done, it appears they have utilised various out of date data and misinterpreted other data to form a view along with checking planning and building control records online.
3. WDC has not examined every line of BTPC's appendix 1, partly because the format of the spreadsheet is hard to understand and cannot therefore be done with confidence and partly due to the time that would be involved in carrying out such an exercise. However, we have considered 9 of the applications referred to, focusing on some of those with the largest number of dwellings within the spreadsheet. The analysis of these is set out below. It shows that the Council has picked up all these applications in its records with the exception of a small HMO (12 beds). In total this would vary the housing supply by the equivalent of 3 units

4. However, a more useful way of considering the data provided by BTPC is look at the total housing supply set out in table 6 (page 7) of their statement. Table 1 of BTPC's statement suggests 2274 units have not been taken in to account in WDC's Trajectory. Were that the case, it would be reasonable to expect BTPC's revised housing supply to be at least 2274 units more than WDC's. However, by comparing Table 6 in BTPC's statement with WDC's Trajectory, BTPC's headline suggested supply is 18,528 (net) compared to WDC's 18044 (gross) or 17991 (net). This is broadly a difference of 500 units not 2274. This can, in the main, be accounted for in the following ways:
- a. BTPC assume a windfall allowance that is **274 dwellings** greater (1256 vs 982)
 - b. BTPC assume vacant dwellings can add **115 dwellings** to the supply (the Council considers this approach is not NPPG compliant)
 - c. BTPC include **84 units** granted in monitoring year 2016/17. WDC's position uses 31st March 2016 as its baseline.
 - d. BTPC incorrectly include **37 units** at Warwick Road Kenilworth for a HMO. The scheme was originally granted in 2013, but was re-submitted and granted August 2016. This will be in WDC figures next year but only for nine units.
 - e. 70 units is marked down for Land West of 22 Wellesbourne Road rather 60 which is a difference of **10** (this appears to be based on relying on an erroneous initial notice description of works rather than the planning permission which is up to 60 dwellings)
 - f. In total this accounts for **520** units which would reduce BTPC supply to **18008** which is a difference of **17** with WDC's net of 17991.
5. Analysed in this way, it is suggested that BTPC's figures align very closely with the Council's.

Analysis of 9 applications referred to in BTPC's Appendix 1 (see para 3 above)

- W/11/1251 is suggested as missing from all WDC calculations – 91 dwellings at Academy Drive. Not correct. This is an outline application. The subsequent reserved matters application was for 76 dwellings (W/12/1370) and these dwellings are included in the Council's completions.
- W/12/0713 granted 8 dwellings at Academy Drive. However, this is a variation of the scheme consented above for 76 so that there is a net effect of one additional unit.
- W/12/0789 3 Clarendon Place 12 bed HMO – conversion from office (and W/13/0027 – increase to 14 Bed HMO). This is an oversight, and should be counted as the equivalent of 3 dwellings based on the Council's approach to calculating HMOs. Will be included in 2016 permissions to be monitored.
- W/12/0907 – Clarendon Manor Rest Home – Golf Lane (35 units or 22 at two thirds). In reality the application was for additional 6 bed spaces as an extension to existing care home. However, at the time the Council did not include care home bedspaces and only changed its approach retrospectively.
- W/13/0897 - Parmiter House, Arlington Ave : 51 units and Lodge Manager's Apartment. This is included in the Council's completions 2015/16. It should be noted that due to demolition of existing units, the net increase is 11 units.
- W/13/1204 & W/16/1203: Peacock Hotel. 149 Warwick Rd – student HMO 37 units. Permission had expired. However in line with 2016 permission, it

will be included in 2016 permissions to be monitored.

- W/15/1761 – Land on west side of Southam Rd: 25 units. Included June 2016 Housing Trajectory (Appendix 1j)
- W/16/0196 – South of Offchurch Lane: 150 dwellings. Included June 2016 Housing Trajectory (Appendix 1j)
- W/16/0279 – Seven Acre Close: 50 dwellings. Included June 2016 Housing Trajectory (Appendix 1j)

PART B

Note on CPRE Matter 3 Statement regarding discrepancies in completions data

6. In the written statement prepared by the CPRE for Matter 3 – The Supply and Delivery of Housing they raise concerns from the outset regarding discrepancies in completions data. The Council believes that these concerns are unfounded.
7. The reason for difference is the sources used. The CPRE have cited data from the DCLG Table 253 – Permanent Dwellings completed by Tenure and District. The Council have spoken to a representative of DCLG (via the published contact available on Table 253) and they concurred that **Table 253 is an underestimation** insofar as it relies on Local Authority Building regulation data; NHBC data and Approved inspector's (AIs) data. AIs are not required to submit returns, furthermore if the NHBC or a local authority does not submit a return on time the data is still published. In addition, not all completions require building regulations, e.g. conversions. There is also a rounding process taken as stated on the table: "Figures are rounded to the nearest 10, 0 represents the range 0 – 4"
8. The Council's process for monitoring housing completions is thorough and part of its wider approach to monitoring housing land supply. This has been based on years of experience and sharing best practice with other Councils in the sub region and the Coventry and Warwickshire Monitoring Officers group and the continued requirement for regional housing returns. Each year the Council will interrogate the Development Management database for additional planning consents and those schemes deemed permitted development and/or requiring prior approval. This will be added to the existing commitments data. Once expiries are taken account of, Council officers go to each and every commitment to physically monitor progress. This provides an accurate picture of sites that have not started, under construction and completed and the plots within them. Clearly, it is in the Council's best interest to take such a detailed approach in order to have the most robust position for housing land supply purposes.
9. It should also be noted that the CPRE have cited out of data figure for 2015/16 for the 'WDC Statistics' of 679 estimated completions rather than 619 figure submitted in the June 2016 trajectory.