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NORTH WARWICKSHIRE LOCAL PLAN – EXAMINATION

September 2018

Representation Ref SLP447

Matter 1 – Duty to Co-operate

The effect of the application of the Duty to Cooperate has been to greatly increase the requirement for housing in North Warwickshire. The real housing requirement to meet the Borough's own needs is 3,800 dwellings over 2011-2033, or under 190 / year. See the Local Plan, p32, para 7.34 and Table 1. This is consistent with the general rate of housebuilding in N Warks – see Doc NWBC11, Table 2. In past years it was lower than 190 dw/year but recently it has been higher.

This rate of new housing supply is achievable and locally supported. Substantial increases are neither, as is shown by the doubt that higher numbers would be built and by the scale of objections to the new allocations that are not in the 2013 Local Plan (Core Strategy).

The 500 houses to be accepted over the Plan period from Tamworth are already included in the Core Strategy and the duty to cooperate has not changed that. It is the agreement to take 540 units from Coventry and 3790 from Birmingham under recent Memorandums of Understanding that is so damaging. (Although in theory these are allocations from HMAs, in reality they are from the claimed 'unmet needs' of the two cities.

These transfers of housing numbers have not been independently scrutinised and have not been reviewed in light of recent evidence that the 'unmet needs' do not exist (in the case of Coventry) and are overstated (Birmingham). The 2016-based SNPP projections and (to be issued shortly) SNHPs are lower. And evidence presented in objections to the Local Plan in March 2018 shows that the Coventry projections are falsely based and not credible; the Birmingham projections appear to be overstated by one-third.

Details are set out in the March 2018 responses to the Plan by Keep Our Green Belt Green (Rep. No SLP294). See Doc CD1/4 segment SLP277_SLP300, starting at page 111 and continuing to page 145. CPRE Warwickshire supports the conclusions set out in those representations.

The relevant local planning authorities have not engaged constructively and on an ongoing basis with NWBC on the housing requirements. Both Coventry City Council and Birmingham City Council have pushed incorrect, exaggerated housing numbers at NWBC. This has not been constructive engagement. And when new information has emerged to show that the numbers used are too high, those Councils have not come forward with lower figures.

On matters other than housing numbers, there do not appear to be any problems with the application of the duty to cooperate.