

**Response by NWBC on the Matters, Issues and Questions  
Phase 1, Strategic Matters**

**Matter 3      Housing needs and requirements**

**3.1    Is LP strategic objective 2 consistent with policy LP6 and the NPPF 2012 in seeking to provide for the housing needs of the Borough?**

3.1.1 The purpose of LP Strategic Objective 2 is to articulate that the Plan is seeking to meet housing needs, including the need for all types of housing including affordable housing and the needs of different groups in the community in line with NPPF.

3.1.2 The Council is happy to make clear at this point in the plan that it is also contributing to meeting wider unmet needs from other parts of the housing market areas in which it sits, if the Inspector considers this is necessary.

**3.2    In respect of OAHN the LP is based primarily on a Strategic Housing Market Assessment covering CWHMA authorities (the 'SHMA')[CD8/10]. Is the SHMA an appropriate evidence base?**

3.2.1 The 2015 SHMA [CD8/10] provides the primary evidence base on the OAHN which underpins the plan. This was prepared jointly for the local authorities in the Coventry and Warwickshire HMA, and has underpinned the preparation of the current round of plans within the HMA. It has followed the approach set out in the 2012 NPPF and associated Planning Practice Guidance (PPG).

3.2.2 The SHMA has been tested and found to provide an appropriate evidence base in the examinations of the Warwick and Coventry Local Plans, and has also informed the local plans in Rugby and Nuneaton and Bedworth which are at a main modification stage. Stratford has an adopted Local Plan dealing with housing from both the CW HMA and GB HMA.

**(a)    what is the effect of 2014-based household projections?**

3.2.3 The 2014-based Household Projections were published in July 2016. Following their release, the Coventry and Warwickshire HMA authorities commissioned a report from

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JG Consulting to consider these, and whether there were any implications for the OAHN.

3.2.4 The JG Consulting report, dated August 2016 (AD8), uses a consistent methodology to the 2015 SHMA. Across the HMA, this showed a very similar level of housing need to the 2015 SHMA (CD8/10) at 4,237 dpa compared to 4,272 dpa, a 1% difference. This was not considered to be a meaningful change. The report concluded: *“Overall, this updated analysis, taking account of more recent published data, does not suggest any fundamental differences from the analysis and conclusions as set out in the UAoHN of September 2015. These therefore remain a robust basis for forward planning”*. (Paragraph 11.5, page 39). The UAoHN report referred to is CD8/10.

3.2.5 The conclusions for North Warwickshire were also similar, as shown in the table below. Whilst the demographic need figure was lower (149 dpa), a higher upward adjustment to support economic growth, the result being an OAN of 238 dpa instead of the 237 dpa figure in CD8/10 – a 1 dpa difference.

**Table 1.1: Housing Need using 2014-based Household Projections**

Figure 3: Components of OAN, Homes per Annum 2011-31 (conclusions consistent with UAoHN)								
	Demographic-based Need		Supporting Economic Growth		Improving Affordability		Total	
	Update	UAoHN	Update	UAoHN	Update	UAoHN	Update	UAoHN
Coventry	2,364	(2,099)	0	(0)	2	(21)	2,366	(2,120)
North Warwickshire	149	(163)	65	(47)	25	(27)	238	(237)
Nuneaton & Bedworth	348	(423)	118	(73)	5	(6)	470	(502)
Rugby	436	(464)	0	(0)	12	(16)	448	(480)
Stratford-on-Avon	409	(449)	202	(201)	12	(9)	623	(659)
Warwick	462	(600)	68	(0)	15	(0)	545	(600)
Coventry/Warwickshire	4,167	(4,197)	-	-	70	(75)	4,237	(4,272)

Source: Derived from ONS and CLG data and Updated Assessment of Housing Need (2015) – Table 53

3.2.6 The authorities considered the results in the context set out in Para 2a-016-20150227 in the PPG which deals with the release of new demographic projections. It sets out that projections should be considered, but an assessment is needed if they point to a ‘meaningful change in the housing situation’ and assessments are not simply rendered outdated every time new projections are issued. It was concluded that the 2014-based Household Projections did not point to a meaningful change.

3.2.7 The JGC Report (AD8) was considered in the Coventry Local Plan Examination, with the Inspector concluding that “whilst there were differences for individual areas, the updated analysis does not point to any fundamental differences from the conclusions of the 2015 Update. When the more recently published data is taken into account, it is clear that the identified level of need across the HMA remains valid.” (Report on the Examination of the Coventry Local Plan 2011 – 2031 October 2017, Para 27 (AD10)). The Warwick Inspector also concluded that the approach was reasonable and pragmatic (Report on Examination of the Warwick Local Plan July 2017, Para 37 and para 69 (AD9)).

3.2.8 The Council is aware that new 2016-based Household Projections are due to be released on 20<sup>th</sup> September. It will seek to consider these on their release and update the examination at the Hearing.

**(b) are the findings of the SHMA consistent with those of the GBHMA Strategic Growth Study published in February 2018 (‘SGS’)[CD8/13A, INSP2]. If not, what are the reasons for any differences?**

3.2.8 The SHMA [CD8/10] defined the housing needs of the Coventry and Warwickshire HMA and constituent authorities therein. This represents the core evidence on OAN on which the Local Plan is based.

3.2.9 Against the context of the Government’s stated intention in the Housing White Paper (Feb 2017) to introduce a standard methodology for calculating housing need, the GBHMA Strategic Growth Study (CD8/23) did not specifically define an OAHN. It considered a set of parameters for housing need at a housing market area level across the 14 authorities.

3.2.10 The GBHMA Strategic Growth Study deals with a different geography<sup>1</sup>, and defined a minimum housing need for 205,000 homes between 2011-31 and 256,000 homes between 2011-36. This was derived from the 2014-based Population and Household Projections. The figures arising from this were very similar to those arising from

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<sup>1</sup> The GBHMA includes the local authorities of Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Solihull, South Staffordshire, Stratford-on-Avon, Tamworth, Walsall and Wolverhampton. Both North Warwickshire and Stratford-on-Avon also fall within the Coventry & Warwickshire HMA.

previous research which had considered 2012-based Projections<sup>2</sup> and figures arising from the application of the Government's proposed standard methodology as set out in its Nov 2017 consultation on *Planning for the Right Homes in the Right Places* (187,828 dpa to 2031 with the cap applied to Birmingham's figure; 206,758 dpa without – CD8/13A Figure 14, p57).

3.2.11 The Strategic Growth Study identified that higher housing provision would be necessary to support delivery of the Economy Plus Scenario in the West Midlands Combined Authority's Strategic Economic Plan (SEP) (AD13). Understandably the SEP takes an ambitious and aspirational view of future growth prospects which would see significantly stronger economic performance than achieved historically. Planning for this level of growth does not represent the agreed position of the local planning authorities in the Greater Birmingham HMA, and should not be construed as an OAN figure.

3.2.12 The Strategic Growth Study does not define housing need figures for individual local authorities, and thus does not define an OAHN figure for North Warwickshire specifically.

**(c) are student numbers appropriately assessed in the SHMA?**

3.2.13 Yes. The student population in the HMA is principally resident in Coventry and Warwick District. This issue has been tested through local plan examinations in both of these areas, and the SHMA approach found to be appropriate.

3.2.14 The Coventry Local Plan Inspector considered queries regarding the under-recording of out-migration of international students. Her conclusions (Report on the Examination of the Coventry Local Plan 2011 – 2031 October 2017 (AD10), Paras 43-44) were that the demographic projections did not look to be erroneous. These state:

*“43. It has been suggested that the level of housing need in Coventry has been over-estimated on account of inaccuracies in recording the number of students arriving and leaving the City. The Coventry City Council looked specifically at whether student growth could have inflated the ONS 2012-based SNPP and household projections and whether out migration could have been underestimated. The evidence (Note by*

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<sup>2</sup> Peter Brett Associates (Nov 2014) Strategic Housing Needs Study, Stage 2 Report. This identified a need for 204,000 homes across the Birmingham HMA between 2011-31.

*GL Hearn on Students & Housing Need in Coventry (September 2015)) suggests that student numbers have been growing in Coventry with a notable increase in foreign students over the last 10 years. However, whilst some of the flow of international migrants to the City has been to study, the evidence shows that this does not have a particular impact on overall flows and that numbers of economic migrants are likely to be higher. Whilst there is a strong level of international migration of young persons, the highest inflows are of those aged 20-24 rather than 18-19 year olds. There is significant internal out migration from Coventry of those aged between 20-35 but particularly those aged 20-22. This suggests that some students who come to Coventry to study from abroad then move to other parts of the UK.*

*44. There is no clear evidence of an under-recording of out-migration of international students. The assessment acknowledges that it is difficult to definitively say whether the various data feeding into the SNPP serves to over or under-estimate international out migration. However, the evidence shows that international students are not a particularly substantial component of overall international migration to the City whilst the age-specific evidence of internal out migration suggests students move to Coventry but subsequently move elsewhere within the UK. Overall, predicted future population growth in Coventry does not look to be erroneous when compared to past trends. As outlined previously it sits somewhere between short and longer term trends.*

*45. Overall, the updated analysis of more up-to-date information shows that there is a very similar level of housing need across the HMA, i.e. 4,237 per annum compared to 4,272 previously. On the basis of the evidence and taking account of more recent published data, I consider that there are no overriding fundamental differences from the analysis and conclusions set out in the 2015 Update. This supports the robustness of the objectively assessed identified level of need set out in the Plan.”  
Extract from Inspector’s Report on the Examination of the Coventry Local Plan 2011 – 2031 (13 October 2017)*

3.2.15 Subsequent to this, ONS has revised its estimates of the distribution of international emigration to local authorities, using an updated model which better captures outflows of students. Revised mid-year population estimates for the 2012-16 period released by ONS in March 2018 take this into account and show upward revisions to emigration from Coventry over the 2011-15 period, resulting in slightly less population growth. However they also show stronger more recent immigration to Coventry between 2014-16, the result of which is that overall the revisions show a population in Coventry which in 2016 which is 300 higher than previously estimated.

3.2.15 Whilst the evidence continues to show greater uncertainty regarding population estimates and projections for Coventry than other areas, the latest ONS data provides no evidence that population and household growth in Coventry has been under-estimated.

3.2.16 In respect of Birmingham, the revised Mid-Year Estimates have made very little difference to its estimated population in 2016 (0.3% difference), and its population in 2031 is expected to be essentially identical (a 0.01% difference).

3.3 **LP table 2, consistent with the SHMA, sets out that the overall OAHN for NWBC is 237 homes annually to 2031. Is that robust?**

**(a) With reference to INSP2, does that figure take account of local planning authorities' or Local Enterprise Partnership economic policies?**

**(b) Has that figure been suitably adjusted to reflect local circumstances, including demographics, headship rates, employment trends, and market signals in accordance with the PPG?**

**(c) what is the precise basis for the uplift to OAHN proposed on account of forecast economic growth and improving housing affordability?**

(Please note that the following provides a comprehensive answer covering all of the above questions).

3.3.1 Yes. The joint Coventry and Warwickshire SHMA (AD11) was produced by the HMA authorities in 2013, and formed the evidence base for the Council's adopted Core Strategy (CD6/2B). This identified the Coventry and Warwickshire HMA as the appropriate housing market area, although the Council recognises that there is also overlaps with the Greater Birmingham HMA.

3.3.2 The SHMA was updated in 2015 and CD8/10 provides the joint evidence base which has informed the current round of plans across Coventry and Warwickshire. This has been tested and been found sound in both Coventry and Warwick District, with examinations ongoing in Rugby and Nuneaton and Bedworth with both progressing to main modifications. No issues have been raised about this in these examinations regarding the robustness of the OAN.

3.3.3 The 2015 SHMA identifies a demographic need for 163 dpa based on the 2012-based Household Projections (Figure 30, p55). The SHMA included sensitivity

testing considering the then latest mid-year population estimates, Unattributable Population Change (UPC) and longer-term migration trends. In respect of 10 year migration trends, it however raised issues regarding their robustness (see Para 3.66) concluding that the 2012-based SNPP provided a sound projection of the demographic-led need for housing. It concluded that adjustments for UPC were not warranted (see Paras 3.55 and 3.65).

3.3.4 The SHMA identified a need for 92 affordable homes per annum (Table 43, p107). It analysed market signals concluding for North Warwickshire that house prices in the Borough are similar to the West Midlands but below the national averages, and had fallen since 2008 in real terms. Rental costs were below both the national and regional average (and had not risen in real terms). The lower quartile affordability ratio was below the HMA and national averages, and had remained relatively stable over the previous decade. The evidence thus provided limited justification applying the 2014 NPPG methodology for making an adjustment for market signals. However the SHMA found some evidence that housing market conditions and the economic recession had in part influenced household formation amongst younger households in their 20s and early 30s, and therefore modelled increased household formation moving forwards (see Paras 7.38-7.48). The effect of this was to increase North Warwickshire's housing need by 27 dpa. Numerically this is a 23% uplift on the 163 dpa starting point.

3.3.5 In regards to employment growth, the PPG in Para 2a-018-20140306 requires plan-makers to assess growth in the jobs and the workforce across the housing market area. Para 2a-008-20140306 is clear that needs should be assessed for this functional area. It is clear on this basis that the balance between homes and jobs is expected to be considered first of all for the HMA.

3.3.6 The SHMA 2015 (CD8/10) assessed forecasts from Experian and Cambridge Econometrics and compared these with historical employment growth. It identified issues with the accuracy of forecasts for 2011-13 when compared with ONS workforce jobs estimates. In drawing conclusions on the expected employment growth in different parts of the HMA, it also took account of local evidence and growth drivers (See Table 27 and Paras 4.56 – 4.57). Given this and the availability of demographic information it modelled adjustments to support employment growth from 2014-31.

- 3.3.7 Para 4.48 in the SHMA explained that the baseline forecasts (i.e. the base Experian and Cambridge forecasts) did not take account of planned infrastructure investment, or economic growth objectives of the LEP or LPAs. However the second sentence explained that these issues are relevant in coming to an informed view regarding economic growth potential. The SHMA went on to do this in the subsequent section (Paras 4.50 – 4.63) in drawing conclusions on economic growth potential. It thus does capture economic policy influences.
- 3.3.8 The SHMA identified that the 2012 SNPP would support workforce growth of 61,315 over this period (Table 26). Set against this, the SHMA concluded that employment growth of 42,800 could be expected (Table 28). The economic-led need for housing in the HMA (3,730 dpa) was thus below the demographic-led need (4,197 dpa). No upward adjustments to support employment growth were thus necessary when considered across the HMA. The Greater Birmingham HMA Strategic Housing Study (CD8/23) indicates that the same would apply to the Birmingham HMA.
- 3.3.9 In line with Para 2a-018, the issue was therefore one of whether an alternative distribution of housing provision would better support sustainable travel patterns in line with Para 2a-018 in the PPG. This is considered further in the Council's response to Question 3.6 which explains that an upward adjustment to support employment growth in North Warwickshire specifically can be achieved through considering an alternative distribution of housing provision within the HMA.
- 3.3.10 The Council notes that neither the Coventry & Warwickshire Strategic Economic Plan (AD12) nor the West Midlands Combined Authority's Strategic Economic Plan (AD13) sets out employment growth targets for North Warwickshire specifically. The Borough Local Plan provides for a very substantial level of housing provision – a level which would support delivery notably higher than any other local authority in the West Midlands region has achieved historically.<sup>3</sup> This will clearly contribute substantively to workforce growth and to the potential to accommodate employment growth in the Borough as the evidence in CD8/8 shows.

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<sup>3</sup> The highest growth rate in housing stock of a local authority in the West Midlands between 2001-17 was 1.2% pa. In contrast the Borough Plan is seeking to deliver 1.8% pa stock growth (see CD8/13A Table 63, p237).

**3.4 Have the housing needs of all members of the community, including for affordable housing, been robustly assessed and translated into policy?**

3.4.1 Yes. The Nov 2013 SHMA (AD11) considered the need for affordable housing, for different types of homes, and the needs of different groups within the population.

**(a) Does the forecast level of affordable housing need in LP paragraph 8.10 accord with that of the SHMA? If not, why not?**

3.4.2 The 2015 SHMA (CD8/10) updates the assessment of affordable housing need therein, identifying a need for 92 affordable homes per annum (CD8/10 Table 42, p107). This represents the latest evidence of affordable housing need and therefore LP Para 8.10 should be amended.

***Suggested modifications***

<i>Chapter</i>	<i>Para</i>	<i>Proposed Modification</i>	<i>Main Mod or Additional Mod</i>	<i>Reason</i>
8	8.10	Reference to 2015 SHMA and not 2013 SHMA and amendment to need figure to 92 per annum	<i>Additional Mod</i>	<i>Correction</i>

**(b) What is the total quantity of affordable housing predicted to be delivered over the plan period relative to needs?**

3.4.3 Policy LP9 seeks 30% affordable housing on brownfield sites and 40% on greenfield sites of over 10 dwellings subject to viability. The precise level of affordable housing to be delivered will invariably be influenced by site-specific circumstances. If 30% of the minimum housing requirement of 5,808 dwellings was achieved, 1742 affordable homes would be delivered (79 dpa). If 35% affordable housing provision was achieved, 92 affordable homes would be delivered.

3.4.3 It should however also be borne in mind that the scale of affordable housing is very sensitive to changes in entry-level housing costs relative to incomes. The very substantial level of housing provision which the plan seeks to deliver can reasonably be expected to improve the affordability of market housing over time, which in turn would reduce the scale of affordable housing need.

**3.5 Are traveller needs based on robust evidence in accordance with the PPTS 2015, namely the Accommodation Assessment of June 2013? [CD8/14]?**

3.5.1 Yes. The Borough Council considers that the 2013 Study is robust. The 2013 Study was commissioned by local authorities along the A5 corridor. The need identified was relatively low and is being delivered. A transit site has been delivered and there are residential sites available for the Gypsy and Traveller community. The Borough Council is looking to work with Tamworth BC and Lichfield DC to prepare an updated report. NBBC is also likely to be joining the commission. This is considered to be at an appropriate level and an appropriate time in accordance with the NPPF.

**3.6 LP table 1 indicates that 940 homes of the proposed LP housing requirement are attributable to 'economic uplift' from the CWHMA and GBHMA in a 35%/65% split (320 and 620 homes). With reference to INSP2, is that approach consistent with the approach to establishing OAHN set out in the NPPF 2012 and PPG?**

3.6.1 Yes. The PPG in Para 2a-018-20140306 requires plan-makers to assess growth in the jobs and the workforce across the housing market area. The SHMA identified that the 2012 SNPP would support workforce growth of 61,315 over this period (Table 26). Set against it concluded that employment growth of 42,800 could be expected (Table 28). The economic-led need for housing in the HMA (3,730 dpa) was thus below the demographic-led need (4,197 dpa). No upward adjustments to support employment growth were thus necessary considered across the Coventry & Warwickshire HMA (AD11). The Greater Birmingham HMA Strategic Housing Study (CD8/23) indicates that the same would apply to the Birmingham HMA.

3.6.2 The SHMA outlined that issue was therefore one of whether an alternative distribution of housing provision would better support sustainable travel patterns in line with Para 2a-018 in the PPG. In Para 7.21 – 7.23, the SHMA set out:

1. The evidence suggests no need to increase housing provision overall across the HMA. However it does suggest that the distribution of housing may need to be considered. Higher housing provision, relative to the demographically-based need, is shown to be needed in Nuneaton and Bedworth, Stratford-on-Avon, and in North Warwickshire. The economic-driven need is lower in the other authorities, and particularly in Coventry.

2. The distribution of housing need to support economic growth (which would impact on future migration assumptions) would need to be agreed through the Duty to Cooperate.
3. GL Hearn considers that where an authority is meeting unmet needs from another, this will support population and workforce growth within the receiving authority's area. On this basis it is important not to double count unmet needs and provision to meet economic growth.

3.6.3 In doing so, the report recognised that redistributing unmet need from Coventry would support workforce growth within the recipient authorities. The same position would apply for Birmingham. The HMA authorities took this on board in developing the MOU regarding the distribution of housing provision. The Council has included in Appendix 1 to this paper, the supplementary report explaining how the basis of the housing distribution was determined. The full report can also be found on: [https://www.rugby.gov.uk/meetings/meeting/669/coventry\\_warwickshire\\_and\\_hinckley\\_and\\_bosworth\\_joint\\_committee\\_for\\_economic\\_growth\\_and\\_prosperity](https://www.rugby.gov.uk/meetings/meeting/669/coventry_warwickshire_and_hinckley_and_bosworth_joint_committee_for_economic_growth_and_prosperity).(AD14)

3.6.4 In conclusion, the HMA-wide evidence indicates that the demographic-led need is above the economic-led need. At a more local level, a balance between homes and jobs through considering a distribution of housing. Meeting unmet need from Coventry or the Birmingham HMA will support workforce growth in North Warwickshire. The base OAN figure to which provision for unmet need should therefore be added is 190 dpa. This position has been agreed by the other CWHMA authorities and is not disputed by GBHMA authorities. The approach has also been accepted by Inspectors in other local plan examinations within the CWHMA.

**(a) what is the basis for the relative apportionment between the CWHMA and GBHMA?**

3.6.5 Recognising that North Warwickshire sat across two HMAs, an analysis was undertaken by GL Hearn of the proportion of gross migration flows (based on analysis of 2011 Census origin/ destination data) between North Warwickshire and other authorities in the Coventry & Warwickshire HMA, and with the Greater Birmingham HMA authorities. This analysis, which the Council has included as Appendix 2, identified 65% of flows where with the Greater Birmingham HMA and 35% with CWHMA. In developing the Coventry and Warwickshire MOU on the distribution of housing (CD5/3C), the economic uplift of 47 dpa was thus distributed in

this way, assuming 65% of the additional in-migration to North Warwickshire was from the Birmingham HMA and 35% from Coventry/Warwickshire.

**(b) Is it accurate to describe 500 of those 940 homes as ‘redistributed’ from Tamworth Borough Council (‘TBC’)? If not, how should any previous and future housing delivery in NWBC relate to unmet needs of TBC within the context of the GBHMA and the previous commitment in the CS?**

3.6.6 Yes. Tamworth forms part of the GBHMA. The 500 home figure derives from the MOU (CD5/3) between NWBC, Tamworth BC and Lichfield DC whereby NWBC and LDC each agreed to deliver 500 homes each to deal with unmet need from Tamworth. This was included as a commitment in the North Warwickshire Core Strategy (Policy NW4 of CD6/2B).

3.6.7 As described above, workforce and economic growth in North Warwickshire will be supported by additional in-migration to the Borough from other areas. ONS data for the year to June 2017 indicates that North Warwickshire was the top destination for out-migrants from Tamworth.

3.6.8 A SoCG (AD2) is being prepared to update the MoU with TBC and LD to provide the very latest information. It is being finalised and will be sent to the Inspector as quickly as possible.

**3.7 The LP housing requirement includes 540 homes redistributed from other authorities within the CWHMA in accordance with a Memorandum of Understanding to that effect (the ‘CWHMA MoU’) [NWBC4]. The LP also aspires to deliver 3,790 homes redistributed from the GBHMA, 10% of the level of anticipated undershoot over the plan period relative to needs (as established in Birmingham City Council’s Local Plan). Is that justified?**

3.7.1 Yes. The Borough Council considers it is justified and this is explained below.

**(a) Is accommodating an additional 540 homes redistributed from the CWHMA justified and appropriate, including in terms of the exercise of the DtC?**

3.7.2 Yes. North Warwickshire and Coventry fall within a common Housing Market Area. Coventry City Council has prepared its Local Plan 2011-31 (AD10A) which has been examined and found sound. The Coventry Local Plan made provision (informed by capacity) for 24,600 homes against a need for 42,400 homes, leaving a shortfall of 17,800 homes (2011-31).

3.7.3 The basis of the redistribution of the unmet need to the Warwickshire authorities in the MOU is explained in the report which accompanied this to the Shadow Economic Prosperity Board on 29<sup>th</sup> September (AD14). A first stage redistribution was identified based on supporting economic growth in a number of the Warwickshire authorities. Following testing of a number of alternative spatial options, the second stage redistribution took account of relative functional relationships of the Warwickshire authorities within Coventry based on gross commuting and migration flows. The Warwick Local Plan Inspector has examined this and described the MOU has based on a logical and justifiable analysis (Warwick Local Plan Inspector's Report Para 71 (AD9)).

**(b) I note that LP paragraph 7.36 explains that Nuneaton and Bedworth Borough Council, within the CWHMA, are updating their Strategic Housing Land Availability Assessment to establish whether or not they will be able to accommodate the level agreed in the CWHMA memorandum of understanding. Is there yet an outcome? Does that have any meaningful effect for the LP?**

3.7.4 Yes. The situation of NBBC has changed. They did not want to sign the MoU without having the evidence to say they would be able to accommodate the redistributed growth. This has been resolved and they have progressed their Local Plan seeking to deliver the full OAN as well as the redistributed numbers. NBBC updated its SHLAA and on this basis the Council resolved on 26<sup>th</sup> July 2018 to consult on main modifications of its plan. The main modifications amend the housing requirement to make provision for at least 14,060 homes (2011-31), meeting the figure set out in the CWHMA MoU [CD5/3C]. A Position Statement (AD6) has been agreed and this is attached to Matter Paper 1. The other CWHMA authorities are therefore now all planning to meet the figures set out in the MoU.

**(c) Is the level of unmet need predicted to arise in the GBHMA to 2031 evidenced via the SGS consistent with that in the LP and SHMA? If not, why not? What is a robust**

**assessment of likely housing needs arising in the GBHMA that would be unmet by 2031/2033?**

- 3.7.5 The position regarding unmet needs is set out clearly in the MOU between NWBC and Birmingham City Council (Appendix D to NWBC4, the Duty to Cooperate Paper).
- 3.7.6 The latest evidence is provided by the GL Hearn/Wood Study (CD8/23) which as set out in the MOU indicates a shortfall in supply of 28,150 dwellings to 2031 and a further 32,700 dwellings to 2036 (see CD8/23 Table 2, p16). These figures take into account the proportion of Coventry's unmet need which is accommodated in the districts of North Warwickshire and Stratford-on-Avon. They take into account the consistent assessment of land supply undertaken in the GL Hearn/Wood Strategic Growth Study and take account of the supply proposed to be brought forward in North Warwickshire's Local Plan (and other emerging plans in the HMA). The Council recognises that a number of councils will need to review housing requirement figures in their plans to take account of updated information on land availability.
- 3.7.6 As set out in the MOU, and evidenced in the Strategic Growth Study, the majority of this housing shortfall emanates from Birmingham although there are other authorities who are unable to meet their own housing needs including Tamworth.
- 3.7.7 The Birmingham Development Plan (AD16) was adopted in January 2017 and sets a housing requirement of 51,100 homes (2011-31) against a housing need of 89,000 homes. This pre-dated the GBHMA Strategic Growth Study (CD8/23). This was based on information at that time, whereas the latest information taken into account in the SGS identifies a higher potential land supply in the City.

**(d) What is the justification for the LP seeking to provide redistributed housing from the CWHMA and GBHMA in a 12.5% / 87.5% proportion (540 and 3,790 homes respectively) compared to the 35%/65% split indicated in LP table 1?**

- 3.7.8 The 65%/35% split between the Birmingham and Coventry focused HMAs related to the proportion of additional economic-led migration to North Warwickshire which is expected to arise from the two areas. This was just the first stage of the redistribution within the CWHMA, with the proportion of the residual unmet need from Coventry to be North Warwickshire influenced by the strength of its migration and

commuting flows with Coventry relative to those between Coventry and the other Warwickshire authorities. The specific calculations are shown in Appendix 5 to the 29<sup>th</sup> June 2015 Report to the Coventry, Warwickshire and SW Leicestershire Shadow Prosperity Board (AD14). The Council has reproduced these as Appendix 1.

- 3.7.9 There has not been a similar agreement between the Birmingham HMA authorities on the appropriate redistribution of unmet need as plan-preparation is not as well aligned in this area. However the local authorities are working on a Statement of Common Ground, to provide to the examination a position statement (AD7) showing the progress that is being made.

**3.8 In establishing the overall housing requirement, has appropriate account been taken of the wider economic context to NWBC, including HS2?**

- 3.8.1 The Borough Council has taken account of the wider economic context for the Borough. It considers that this relates in particular to the borough's central location within the country and the motorway network which runs through it; together with the development over the plan period of the HS2 rail line.
- 3.8.2 The Council has sought within the plan to align its strategy for housing and employment in line with Para 158 in the NPPF. It specifically commissioned evidence to consider the interaction between housing provision and employment land, and this is set out in CD8/8.
- 3.8.2 In relation to HS2 there have been views put forward that the Borough is not making the most of the line. However there are sound reasons why little to no development is being proposed near the route or the interchange station which will lie to the south of the Borough in Solihull MBC.
- 3.8.3 Two parts of HS2 which will go through the Borough. Phase 1 will essentially follow the M6 Toll whilst Phase 2b will follow the M42. It is expected Phase 1 will open in 2026 whilst Phase 2B is likely to open in 2033. This means that during the first part of the Plan period, construction will take place of Phase 1 which includes one of the most complex parts of the route outside of Euston Station.

- 3.8.4 Phase 1 has a number of viaducts and spurs including a section going over the M6, in what is known as the Delta Junction. Disruption to the road network during construction is expected to be severe. Junction 9 M42 is already near to capacity even without the growth pressures of the Interchange station, Peddimore Employment allocation and the Langley SUE housing allocation. Any further development in the area would need to demonstrate how additional proposals would be implemented. In addition, HS2 Ltd and their contractors have powers during construction to stop any works which will interfere with the construction of the line under Traffic Regulations Orders. This means that even if the Borough Council were to suggest sites coming forward in this corridor, the likelihood is that they could not be physically built. This disruption taken with the other factors of sites being available and deliverable outside of the Green Belt means that the focus for this Local Plan is away from the Coleshill corridor.
- 3.8.5 Phase 2 will then be constructed in the M42 corridor. It is expected that construction will cause substantial disruption to junction 10 M42 and A5 junction. This will influence the potential for employment development.
- 3.8.6 In the past North Warwickshire has been the focus for the provision of Regional Logistics Sites, resulting in Hams Hall and Birch Coppice coming forward. The Borough Council has continued to support both of these sites with extensions being approved and allocated over recent years including through the development of this Local Plan. An additional 20 hectares is currently being delivered at Hams Hall on the Former Power Station B site, with a planning application approved following the site being put in the Regulation 18 version of the Local Plan. There are smaller extensions at Birch Coppice, but this follows approval of a further 17 hectares at Hall End (directly adjacent to Birch Coppice) and a further 25 hectares at junction 10 of M42. The Council considers that it is therefore continuing to make provision for logistics space taking into account its geographical attractiveness (alongside a range of other areas in the wider region) for this form of development.
- 3.8.7 Through the development of the plan, the Council has sought to balance the provision of homes and jobs, drawing on the analysis in CD8/8.
- 3.8.8 In addition, a recent study has shown that the Borough's approach is correct in that the threat to automation particularly within the B8 use class will be a major issue for

the Borough - [http://www.localis.org.uk/wp-content/uploads/2018/03/015\\_Automation\\_AWK.pdf](http://www.localis.org.uk/wp-content/uploads/2018/03/015_Automation_AWK.pdf) (AD15). The report states as one of its key points that:

*“The places where automation should cause most concern to people and policymakers are predominantly in the Midlands. They are places, such as Corby and North Warwickshire, where there is a high proportion of people working in the industries at highest-risk of automation. If a ‘big bang’ moment occurs as expected, where a large proportion of jobs in these industries are automated in a short amount of time – what we have termed cliff-edge automation – these are the places whose local economies and workforce will be worst impacted by impending automation.”*

**3.9 With regard to INSP2, is the LP policy aspiration to deliver 3,790 homes redistributed from the GBHMA robustly evidenced and consistent with the NPPF 2012? If not, how should it be modified?**

- 3.9.1 Under the DtC the Borough Council has worked with all of the LPA’s in the CW HMA and the GB HMA to discuss and progress the provision of housing for the whole HMA. In the case of CW HMA this has been achieved through an agreed MoU to redistribute the housing shortfall. In relation to GB HMA the Borough Council has agreed a Memorandum of Understanding with BCC to seek to deliver 3790 homes. Although there is no MoU with the other 12 local planning authorities, discussions have been on-going and it is intended that a Statement of Common Ground (AD7) is prepared for the examination to explain where each local authority is, and the intention to work together to meet the Birmingham HMA’s housing needs.
- 3.9.2 The Birmingham Development Plan (AD16), adopted in Jan 2017, sets a housing requirement of 51,100 homes (2011-31) against a housing need of 89,000 homes. The scale of Birmingham’s unmet need is therefore 37,900 homes to 2031. NWBC’s aspiration is to meet 10% of this, and this forms the basis of the 3,790 dwelling figure.
- 3.9.3 NWBC6 sets out how this 10% figure had been calculated. This outlined that there was out-commuting of 5,151 persons daily in 2011 from Birmingham to North Warwickshire. It set out two scenarios in which these in-commuters from Birmingham could be accommodated within the District – the first assuming that each occupied an additional home; and a second in which a 2.39 persons per dwelling ratio was assumed. This suggested that NWBC might accommodate between 2155 – 5151 dwellings, equivalent to between 5.7 – 13.6% of Birmingham’s unmet need. The Council considered 10% to be reasonable as it sat centrally within this range.

3.9.4 The Council has discussed its aspiration to meet 10% of Birmingham's unmet needs with its HMA partners. However because plans are at different stages of preparation, with many of the Councils in the HMA having recently commenced a review of their plans to take account of Birmingham's unmet need, there is not at the current time an agreed apportionment of housing needs between the GBHMA authorities. The Borough Council however does not consider that this indicates that it should delay in making provision for unmet needs within this Plan particularly in view of the provision for an early review set out in the Borough's Core Strategy.

3.9.5 The capacity of different areas to sustainably accommodate development is clearly an important component in assessing the distribution of housing provision. As local authorities are at different stages in assessing this, it is necessary for North Warwickshire to consider what proportion of the unmet need it might reasonably accommodate.

3.9.6 The Council considers that, drawing on the Birmingham HMA Strategic Growth Study (CD8/23), there are a number of important factors to take into account in considering this:

- Within the housing market area, an unmet housing need arises in particular from the conurbation. Unmet need arises from Birmingham, but may also arise from the Black Country. On the current evidence set out in CD8/23 there is little prospect that the Black Country authorities could substantively contribute to meeting Birmingham's unmet need.
- Outside of these areas (and leaving aside Green Belt) there are other local authorities where historically strategic land supply constraints have constrained their ability to meet housing need. This includes Tamworth, which adjoins North Warwickshire, Redditch and Cannock Chase (in particular due to the Cannock Chase SAC). These authorities have an unmet need which has been identified in plans adopted since 2012.
- Issues related to the level of housing delivery which could realistically be sustained in the Borough. (see paras 9.63 – 9.69 in the HMA Strategic Growth Study (CD8/23).

3.9.7 The Borough Council considers that understanding the functional relationships between the conurbation and North Warwickshire is therefore a reasonable starting point in considering how much of the unmet housing need might reasonably be

accommodated in the Borough. However consideration also needs to be given to the potential of different areas to sustainably accommodate additional development.

- 3.9.8 Taking account of the Inspector's comments in INSP2, the Council has undertaken some further work, working with consultants Icen Projects, to consider the proportion of unmet needs which might be met in North Warwickshire. It has looked at the population, migration and commuting flows.

#### Population

- 3.9.9 The 14 local authorities in the Birmingham HMA have a combined population of 3.3 million based on the latest ONS 2017 population estimates. 1.9% of the HMA's population lives in North Warwickshire. It accommodates 6.6% of the population outside of Birmingham and the Black Country.

#### Migration Flows

- 3.9.10 The latest data on migration flows published by ONS relates to the year to June 2017. As analysis of migration flows between authorities within the Birmingham HMA indicates:

- 4.3% of migration flows between Birmingham and the Black Country authorities to other parts of the HMA are with North Warwickshire. This takes into account in- and out-flows.
- Of out-migration from Birmingham and the Black Country authorities to other authorities in the HMA, 4.5% is to North Warwickshire.

#### *Commuting Flows*

- 3.9.11 Commuting data from the 2011 Census, whilst now a number of years old, remains the latest comprehensive information available on commuting flows. An analysis of flows between authorities in the Birmingham HMA indicates that:

- 4.5% of those commuting into Birmingham and the Black Country from other parts of the HMA do so from North Warwickshire.
- 6.6% of the gross development flow between Birmingham and the Black Country and other parts of the HMA are within North Warwickshire. The higher gross figure reflects net in-commuting to North Warwickshire to work.

3.9.12 This initial commuting and migration flow analysis indicates that potentially between 4.3 – 6.6% of the unmet need might reasonably be accommodated within North Warwickshire (which would equate to between 1,630 – 2,500 dwellings) based on its size and functional relationship with the conurbation.

3.9.13 However, these percentages would assume that all local authorities beyond the conurbation would be able to contribute proportionally to meeting the unmet need. The analysis undertaken as part of the HMA Strategic Growth Study indicated greater strategic constraints to development in some authorities. It for instance indicates that Tamworth would be unlikely to be able to make a substantive contribution to meeting unmet needs from the conurbation. Therefore it is sensible to test the potential to sustainably accommodate a higher proportion of the unmet need in North Warwickshire.

3.9.14 Looking at the functional relationships with Tamworth and North Warwickshire together, analysis shows the following:

- 8.3% of gross migration flows with Birmingham and the Black Country, and 12.7% of the out-migration from Birmingham and the Black Country and other parts of the HMA are to Tamworth and North Warwickshire;
- 10.9% of the commuting flows between Birmingham and the Black Country and other parts of the HMA are within Tamworth and North Warwickshire.

3.9.15 The Council considers that land supply constraints in Tamworth could lead to additional migration to both North Warwickshire and Lichfield, these being the authorities with the largest migration outflows from Tamworth. This suggest that testing the highest levels of unmet need identified by the migration and commuting analysis (10.9% and 12.7%) might be considered a step too far, but does broadly provide support for the Council's approach for testing the potential to sustainably accommodate up to 10% of the unmet need to 2031.

3.9.16 A further relevant planning factor in considering the proportion of the unmet need which might be accommodated in North Warwickshire is its existing balance of jobs and homes. The 2011 Census indicated significant net in-commuting to the Borough to work, whilst the latest ONS Jobs Density data (see below) indicates that the Borough has the highest ratio of jobs to residents of working age within the Greater Birmingham HMA.

3.9.17 Whilst it is important to recognise that jobs density is partly a function of geography, with key employment sites situated close to the borough boundaries in locations which are as close to adjoining urban areas in some instances than many of the settlements in North Warwickshire, increased in-migration through meeting unmet need will support workforce growth in the Borough and improve the broad balance between residents in work and employment opportunities in the Borough. Balanced growth in employment and housing can be expected to reduce the jobs density figure over the plan period.

Jobs Density, 2016

<b>Local Authority</b>	<b>Ratio of Jobs to Population 16-64, 2016</b>
South Staffordshire	0.61
Dudley	0.66
Sandwell	0.70
Wolverhampton	0.70
Walsall	0.71
Cannock Chase	0.72
Tamworth	0.72
Redditch	0.76
Birmingham	0.79
Bromsgrove	0.88
Lichfield	0.91
Solihull	1.01
Stratford-on-Avon	1.11
North Warwickshire	1.27

**3.10 As set out in NWBC2, the LP plan period is intended to be 2011 to 2033. Examination document CD8/13A sets out annual completions since 2011. The CS target was 175 dwellings annually (excluding 500 from TBC). INSP2 asks that NWBC produce a table setting out annual housing delivery over the last 15 years relative to the development plan target that applied in each. In that context what should the 5YHLS requirement be?**

3.10.1 The five year requirement is a function of the base requirement, and shortfall and the buffer.

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3.10.2 The Council considers that the base requirement is for 5,208 dwellings over the 2011-33 plan period, equivalent to 264 dpa. Over a five year period this generates a base requirement of 1,320 dwellings (264 x 5).

3.10.3 Over the plan period to date, 2011-18, there would have been a requirement for 1,848 dwellings (264 x 7). Net completions of 1,272 dwellings have fallen short of this, resulting in a shortfall of 576 dwellings (1848 – 1272).

3.10.4 The base requirement and completions added together give a figure of 1,896 dwellings (1320 + 576). The Council considers that to this should be added a 5% buffer, which equates to 95 dwellings, giving a total requirement of 1991 dwellings over the five year period April 2018 – March 2023.

3.10.5 The Council considers that a 5% buffer is applicable given that over the last three years there has been an over-provision of housing relative to the 175 dpa Core Strategy figure or 264 dpa figure; and an over-provision relative to the Core Strategy figure of 175 dpa both over the period since the adoption of that plan and the base date of that plan in 2011.

3.10.6 The Council does not consider that a longer-term view looking prior to 2011 should be taken given that housing requirement figures were maximum figures with the specific policy intention to restrict supply to support investment in the region's Major Urban Areas.

Housing Delivery Performance in North Warwickshire

	<b>Delivery</b>	<b>Requirement</b>	<b>Over/Under</b>
<b>2011/12</b>	75	175	-100
<b>2012/13</b>	38	175	-137
<b>2013/14</b>	119	175	-56
<b>2014/15</b>	223	175	48
<b>2015/16</b>	251	175	76
<b>2016/17</b>	363	175	188
<b>2017/18</b>	203	175	28
<b>2011-18</b>	1272	1225	47
<b>2014-18</b>	1040	700	340
<b>2015-18</b>	817	525	292

**(a) Is the shortfall of 593 dwellings in the LP accurate?**

3.10.7 The shortfall as calculated above should be 576 dwellings, based on net completions between 2011-18 and a housing requirement of 264 dpa.

**(b) LP paragraph 7.34 states that as the SHMA 'is based on up-to-date demographic evidence it takes account of need arising from shortfalls in delivery against previous targets'. That conflicts with the approach in examination document CD8/13A, where the accrued shortfall in delivery since 2011 is added to the baseline OAHN. Which approach accords with the PPG?**

3.10.8 The 2015 Coventry and Warwickshire SHMA (CD8/10), as well as the evidence for the Birmingham HMA (CD8/23) and Birmingham's Development Plan (AD16) all use a base date of 2011. It would not be appropriate to take into account any under or over-provision prior to 2011 as this is captured within the OAN calculation. This accords with the PPG. However it is appropriate to take account of any under-provision since 2011 when using this evidence in calculating the housing requirement.

**(c) Is there the need to take account of any 'backlog', i.e. under-delivery from earlier plan periods, or is that accounted for in OAHN?**

3.10.9 The current extant development plan is the 2014 Core Strategy, which set out a requirement for 175 dpa from 2011 forwards. Net completions in the Borough between 2011-18 have totalled 1,272 dwellings, equivalent to 182 dpa. There has therefore been no historical under-delivery. The 2015 SHMA takes into account any issues relating to delivery prior to the 2011 base date used therein, and to add on any additional dwellings would introduce double counting.

**(d) Has there been persistent under-delivery of housing to justify a 20% 5YHLS buffer in addition to addressing any shortfall?**

3.10.10 No. The buffer is intended to respond to the borough's track record of delivering housing. As set out above, housing delivery over the period since 2011, which is the base period of the previous plan, has exceeded the annual requirement therein.

Delivery over the last three years has significantly exceeded the Core Strategy requirement. This clearly is inconsistent with there being 'persistent' under-delivery.

**(e) Is there any evidence to indicate that household formation rates may have been constrained by supply across the HMAs previously?**

3.10.11 The SHMA (CD8/10) examined household formation rates and found some evidence that household formation had been suppressed historically. It made adjustments to take this into account, adjusting upward household formation rates in drawing conclusions on the OAN (see CD8/10 Paras 7.38-7.48). This issue is therefore captured within the OAN.

3.10.12 In respect of Birmingham, the Birmingham Development Plan examination found that it would not be appropriate in Birmingham's case to make adjustments to household formation in drawing conclusions on Birmingham's OAN.

**(f) Should any shortfall be addressed within the first five years of the plan in accordance with the PPG,7 i.e. as part of the 5YHLS?**

3.10.13 The Council considers that measured against the annual requirement of 264 dpa it would be reasonable to address the shortfall within the next five years, which is the preferred approach set out in the PPG.

3.11.14 The Council does however note that when provision is being made for unmet need, and this was not included in the housing target historically, that consideration may need to be given to treating this separately.

**3.11 Is the windfall allowance of 60 dwellings a year set out in policy LP8 justified? Why does LP table 6 refer to planning applications rather than consents or completions?**

3.11.1 NWBC considers the windfall allowance is justified. It was determined the number of applications that would be likely to come forward and would be approved as windfall within a monitoring year. The assessment looked at sites of 0.2 hectares and 5 or less units, although in reality there will be a much wider range of sites that would be classified as windfall. Appendix 3 provides the background information on the overall

windfall showing it against the overall housing numbers and the number of expired units during the years from 2011. More detailed information can be provided if required.

**3.12 What is the relevance of paragraph 9.67 of the Greater Birmingham Strategic Growth Study [CD8/23] which sets out that there is ‘no effective potential’ for additional housing supply beyond housing growth of 1.8% per annum? What is 1.8% per annum?**

3.12.1 This part of the Strategic Growth Study was looking at issues of market capacity, and the potential to accommodate additional development. Table 63 therein indicates that the delivery of 9070 dwellings between 2011-31,<sup>4</sup> taking account of completions 2011-17, would require an annual average of 572 dwellings pa to be achieved. This would equate to growth in the housing stock of 1.8% pa. Comparing this to the analysis in Table 62 therein, this would be a higher rate of growth than achieved by any local authority in the HMA historically. Indeed it is higher than the rate of housing delivery of any authority in the East of West Midlands over the short-term (2012-17) or longer-term (2001-17). It was in this context that the SGS concluded that there was ‘no effective potential’ for higher housing delivery to be achieved. Even if additional sites come forward for development it is very unlikely that this completion rate will be surpassed over the Plan period.

**3.13 Are housing delivery monitoring arrangements in LP chapter 15 suitably detailed and robust?**

3.13.1 Examination documents INSP1 and INSP2 have covered the policy context for establishing objectively assessed housing needs (‘OAHN’) and housing requirements including that for a five year land supply (‘5YHLS’). In those documents, which should be considered in conjunction with MIQs, I ask several questions and identify some areas of concern.

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<sup>4</sup> Comprising the OAN, redistributed Coventry need and 3790 dwellings redistributed from other parts of the Birmingham and Black Country HMA, 2011-31

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**Appendix 1**

Agenda Item 5 Memorandum of understanding for the planned distribution of housing for the Coventry & Warwickshire HMA to the Coventry & Warwickshire Joint Committee – 29 September 2015

Agenda Item 5, Appendix 5															
Redistribution Formula															
TABLE 3: AVERAGE OF COMMUTING RATIO AND MIGRATION TRENDS	B	C	D	E	F	G	H	I	J	K	L		2011 COMMUTING DATA	10 YEAR MIGRATION	AVERAGE
	current unmet need	Tested % for redistribution (see table 3a)	total initial redistribution (B*C)	PHASE 1: initial redistribution to support employment OAN	Phase 2 redistribution - left to plan (D-E)	Recalculating any over provision against initial redistribution* (F38*B)	redistribution te recalulated supply difference** (G/4)	total deduction (G+H)	PHASE 2: total reprovision (I+F)	Total reprovision (J+E)	Annualised reprovision (2011-2031)				
CCC	17,800	-	-	-	14,000	-	-	-	-	-	-		-	-	-
NORTH WARWICKSHIRE		5.1%	908	320	588	-44	-14	-58	530	850	42.49		5.64	4.60	5.1
NUNEATON AND BEDWORTH		32.4%	5,767	1,460	4,307	-280	-14	-294	4,014	5,474	273.68		33.40	31.40	32.4
RUGBY		16.5%	2,937	0	2,937	-142	-14	-156	2,781	2,781	139.03		17.89	15.10	16.5
STRATFORD-ON-AVON		6.5%	1,157	2,020	-863	-56	-	-	0	2,020	101.00		7.86	5.20	6.5
WARWICK		39.3%	6,995	0	6,995	-339	-14	-353	6,642	6,642	332.11		35.21	43.40	39.3
<b>TOTALS</b>	<b>17,800</b>	<b>100%</b>	<b>17,764</b>	<b>3,800</b>	<b>13,964</b>	<b>-861</b>	<b>-56</b>	<b>-861</b>	<b>13,966</b>	<b>17,766</b>	<b>888</b>		<b>100</b>	<b>100</b>	<b>99.85</b>
										34					

\* for the purposes of this approach this equals the -852 at Stratford multiplied for each authority by the % figures in column B.

# Coventry and Warwickshire SHMA – Housing Provision for North Warwickshire and Stratford-on-Avon

1.1 The local authorities of North Warwickshire and Stratford-on-Avon have been identified as falling within two housing market areas (HMA) – the Birmingham HMA, and the Coventry and Warwickshire HMA.

1.2 The Birmingham HMA comprises the following authorities:

- Birmingham
- Bromsgrove
- Cannock Chase
- Dudley
- Lichfield
- North Warwickshire
- Redditch
- Sandwell
- Solihull
- South Staffordshire
- Stratford-on-Avon
- Tamworth
- Walsall
- Wolverhampton

1.3 Coventry and Warwickshire HMA comprises:

- Coventry
- North Warwickshire
- Nuneaton and Bedworth
- Rugby
- Stratford-on-Avon
- Warwick

- 1.4 We have attempted to calculate what proportion of housing need in North Warwickshire and Stratford-on-Avon is meeting the needs of each HMA. To do this we have assessed migration and commuting patterns between each local authority and the local authorities within each HMA. The data we have used is the ONS Origin: Destination commuting data, and Migration Flows data, both from the 2011 Census.
- 1.5 As of the 2011 Census the population of Birmingham HMA was 3,163,000. The population of the Coventry and Warwickshire HMA was 862,000. When defining the HMAs, weighted values are used as this shows the relative strength of the link between two areas, even if their populations are relatively small. However, in the analysis below we have focussed on absolute values as this relates more closely to the overall proportion of houses required to meet the needs of each HMA.

## 2 NORTH WARWICKSHIRE

2.1 The ONS migration flows data shows that North Warwickshire has the strongest migration links with Nuneaton and Bedworth with a gross 835 persons migrating between the two authorities over 2010-2011. There are also strong links with Birmingham City, and Tamworth.

2.2 There are 758 gross migrations between North Warwickshire and the City of Birmingham. This represents 15% of North Warwickshire's total gross migrations. There are considerably fewer gross migrations between North Warwickshire and the City of Coventry with 297, representing 6% of North Warwickshire's total gross migrations. In terms of a split between the two cities, Birmingham has 72% of migrations while Coventry has 28%.

**Table 1: Highest Migration Flows Between North Warwickshire and Local Authorities**

	HMA	Out To	In From	Gross
<b>Nuneaton and Bedworth</b>	Coventry and Warwickshire	442	393	835
<b>Birmingham</b>	Birmingham	253	505	758
<b>Tamworth</b>	Birmingham	380	360	740
<b>Solihull</b>	Birmingham	162	275	437
<b>Coventry</b>	Coventry and Warwickshire	125	172	297
<b>Hinckley and Bosworth</b>	Other	118	70	188
<b>Lichfield</b>	Birmingham	90	63	153

2.3 We then sum the gross migration figures for each of the local authorities within the Birmingham HMA, the Coventry and Warwickshire HMA, and any other authorities. The number of gross migrations between North Warwickshire and each of these areas is shown below<sup>5</sup>.

<sup>5</sup> Note: These figures don't sum exactly as North Warwickshire and Stratford-on-Avon is included in both HMAs.

**Table 2: Gross Migrations Between North Warwickshire and HMAs**

	Birmingham HMA	Coventry and Warwickshire HMA	Other
<b>Gross Migrations</b>	2,350	1,275	1,437
<b>%</b>	47%	25%	29%

2.4 There are nearly twice as many gross migrations between North Warwickshire and Birmingham HMA than between North Warwickshire and Coventry and Warwickshire HMA. It also shows there is a considerable amount of commuting from/to North Warwickshire from elsewhere outside either HMA. Ignoring these 'other' figures, the split between the two HMAs is 65% to Birmingham HMA and 35% to Coventry and Warwickshire HMA.

2.5 Looking at commuting patterns, the table below shows the areas with the highest number of commuting journeys per day into or out of North Warwickshire. There is a daily average of 5,627 journeys between North Warwickshire and the City of Birmingham, equivalent to 12% of the total gross journeys into or out of North Warwickshire. There is a daily average of 3,894 journeys between North Warwickshire and the City of Coventry, equivalent to 9% of the total gross journeys. In terms of a split between the two cities, Birmingham has 59% of journeys while Coventry has 41%.

**Table 3: Highest Commuting Flows Between North Warwickshire and Local Authorities**

	HMA	Out To	In From	Gross
<b>North Warwickshire</b>	Both	13,062	13,062	13,062
<b>Birmingham</b>	Birmingham	3,212	2,415	5,627
<b>Tamworth</b>	Birmingham	1,994	3,090	5,083
<b>Coventry</b>	Coventry and Warwickshire	2,928	966	3,894
<b>Nuneaton and Bedworth</b>	Coventry and Warwickshire	2,286	1,567	3,852
<b>Solihull</b>	Birmingham	1,786	769	2,555
<b>Lichfield</b>	Birmingham	501	1,036	1,537

- 2.6 At a HMA level, 39% of gross North Warwickshire's commutes are to / from the Birmingham HMA, while 20% are to / from Coventry and Warwickshire HMA, 29% are internal within the borough, and 15% are to / from local authorities which do not fall within either HMA.

**Table 4: Gross Commuting Flows Between North Warwickshire and HMAs**

	Birmingham HMA	Coventry and Warwickshire HMA	Internal	Other
<b>Commuters</b>	17,699	9,206	13,062	6,895
<b>%</b>	39%	20%	29%	15%

- 2.7 The split between the two HMAs is 66% to Birmingham HMA and 34% to Coventry and Warwickshire HMA. This is very similar to the migration split of 65% to Birmingham HMA and 35% to Coventry and Warwickshire HMA.

### 3 STRATFORD-ON-AVON

- 3.1 In Stratford-on-Avon District the migration flows data shows that the strongest migration links are with Warwick with a gross 1,443 persons migrating between the two authorities over 2010-2011. This is comfortably the highest such figure. The second highest figure is Redditch with 568 persons.

- 3.2 There are 540 gross migrations between Stratford-on-Avon and the City of Birmingham. This represents 5% of Stratford-on-Avon's total gross migrations. There are considerably fewer gross migrations between Stratford-on-Avon and the City of Coventry with 350, representing 3% of Stratford-on-Avon's total gross migrations. In terms of a split between the two cities, Birmingham has 61% of migrations while Coventry has 39%.

**Table 5: Highest Migration Flows Between Stratford-on-Avon and Local Authorities**

	HMA	Out To	In From	Gross
<b>Warwick</b>	Coventry and Warwickshire	620	823	1,443
<b>Redditch</b>	Birmingham	243	325	568
<b>Birmingham</b>	Birmingham	183	357	540
<b>Wychavon</b>	Other	267	263	530

<b>Solihull</b>	Birmingham	165	333	498
<b>Cherwell</b>	Other	160	215	375
<b>Coventry</b>	Coventry and Warwickshire	168	182	350
<b>Cotswold</b>	Other	167	157	323

3.3 We then sum the gross migration figures for each of the local authorities within the Birmingham HMA, the Coventry and Warwickshire HMA, and any other authorities. The number of gross migrations between Stratford-on-Avon and each of these areas is shown below.

**Table 6: Gross Migrations Between Stratford-on-Avon and HMAs**

	Birmingham HMA	Coventry and Warwickshire HMA	Other
<b>Gross Migrations</b>	2,065	2,138	6,943
<b>%</b>	19%	19%	63%

3.4 There are a very similar number of gross migrations between Stratford-on-Avon and Birmingham HMA and Coventry and Warwickshire HMA – both having 19% of gross migrations. There is also a considerable amount of commuting from/to Stratford-on-Avon from elsewhere outside either HMA. Ignoring these ‘other’ figures, the split between the two HMAs is 49% to Birmingham HMA and 51% to Coventry and Warwickshire HMA.

3.5 Looking at commuting patterns, the table below shows the areas with the highest number of commuting journeys per day into or out of Stratford-on-Avon. There is a daily average of 5,726 journeys between Stratford-on-Avon and the City of Birmingham, equivalent to 6% of the total gross journeys into or out of Stratford-on-Avon. There is a daily average of 4,736 journeys between Stratford-on-Avon and the City of Coventry, equivalent to 5% of the total gross journeys. In terms of a split between the two cities, Birmingham has 55% of journeys while Coventry has 45%.

**Table 7: Highest Commuting Flows Between Stratford-on-Avon and Local Authorities**

	HMA	Out To	In From	Gross
<b>Stratford-on-Avon</b>	Internal	34,284	34,284	34,284
<b>Warwick</b>	Coventry and Warwickshire	5,300	7,337	12,637
<b>Redditch</b>	Birmingham	1,050	5,246	6,296
<b>Birmingham</b>	Birmingham	3,147	2,580	5,726
<b>Wychavon</b>	Other	1,232	3,737	4,969
<b>Coventry</b>	Coventry and Warwickshire	2,455	2,281	4,736
<b>Solihull</b>	Birmingham	1,003	1,828	2,831
<b>Bromsgrove</b>	Birmingham	654	1,753	2,407
<b>Cherwell</b>	Other	1,527	717	2,244

3.6 At a HMA level, 22% of gross Stratford-on-Avon's commutes are to / from the Birmingham HMA, with a similar amount to / from Coventry and Warwickshire HMA, 37% are internal within the borough, and 21% are to / from local authorities which do not fall within either HMA.

**Table 8: Gross Commuting Flows Between Stratford-on-Avon and HMAs**

	Birmingham HMA	Coventry and Warwickshire HMA	Internal	Other
<b>Commuters</b>	20,204	20,562	34,284	19,770
<b>%</b>	22%	22%	37%	21%

3.7 The split between the two HMAs is 50% to Birmingham HMA and 50% to Coventry and Warwickshire HMA. This is very similar to the migration split of 49% to Birmingham HMA and 51% to Coventry and Warwickshire HMA.

## Information on Expired and Windfall Dwellings since 2011

Table 1: Number of expired and windfall dwellings per annum

<b>Year</b>	<b>No. of dwellings with planning permission</b>	<b>Number of dwellings expiring during year</b>	<b>Number of dwellings expiring shown as a % of total dwellings with planning permission</b>	<b>Windfall shown as number of dwellings (1)</b>
<b>2011/12</b>	733	9	1.23	211
<b>2012/13</b>	827	10	1.21	57
<b>2013/14</b>	1006	69	6.86	96
<b>2014/15</b>	1020	77	7.55	73
<b>2015/16</b>	1056	19	1.8	104
<b>2016/17</b>	1135	23	2.03	48
<b>2017/18</b>	1306	10	0.77	192
<b>Total</b>	7083	217	3.06	781
<b>Average no of windfall</b>				112

## Notes

1. Windfall number per annum is taken from Table 6 (Policy LP8) on page 38 of the emerging Local Plan

**Table 2: Details of expired housing sites with the number of units**

<b>EXPIRED SITES IN 2011/12</b>	
60, High Street	2
Dunton Stables, Marston Lane	1
68 North Street, Atherstone	1
Rear of 92-94 High Street, Coleshill	3
Land adj 9 Green Lane, Grendon	1
<b>TOTAL</b>	<b>9</b>

<b>EXPIRED SITES IN 2012/13</b>	
Land rear of 113-121 Long Street, Dordon	3
Rear of 35 & 36 Springfield, Coleshill	1
Little Brook Farm, Ansley	1
6 Church St, Atherstone	3
1/2 Orchard Cottages, Atherstone	2
<b>Total</b>	<b>10</b>

<b>EXPIRED SITES IN 2013/14</b>		
Yew Tree Cottage, Hawkeswell Lane, Coleshill B46 3JQ	1	
Wantage Road, Grimstock Hill, Coleshill	1	
Land adjacent to the Dog Inn Public House, Marsh Lane Water Orton, B46 1NW	31	Discovered it is village green from 1960's
<b>Total</b>	<b>33</b>	

<b>EXPIRED SITES IN 2014/15</b>		
Nursery Farm Barn, Ansley Common	2	
Ivy House, Taverners Lane, Atherstone CV9 2BA	14	Business stayed in use
Land adj to 3 St Nicholas Estate, Baddesley Ensor	1	
Land adj 18 Newlands Road, Baddesley Ensor	1	
Kerrycroft, Coventry Road, Kingsbury B78 2LJ	1	
Caldecote Hall Industrial Estate, Caldecote Hall Drive, Caldecote CV10 0TW	4	
<b>TOTAL</b>	<b>23</b>	

<b>EXPIRED SITES IN 2015/16</b>	
Achray, Coventry Road, Kingsbury, Tamworth B78 2NP	4
12 Fosters Yard Hotel, Market Street, Polesworth	12
Holly Cottage, Pooley Lane, Polesworth B78 1JD	3
<b>TOTAL</b>	<b>19</b>

<b>EXPIRED SITES IN 2016/17</b>	
The Vicarage, Newlands Road, Baddesley	2
Land at 8 Potters Lane, Polesworth	1

Hollies Cottage, Church Rd, Dordon	1
Poplars Yard, New Road, Shuttington	5
Homer House, Kingswood Avenue, Corley	1
Reynolds Cottage, Square Lane, Corley	1
91 Ratcliffe Road, Atherstone	4
United Reformed Church, Keys Hill, Baddesley Ensor	4
Land adjacent to 1 Ivyleigh Villas, Church Lane, Shuttington B79 0EB	1
75 Coleshill Road, Hartshill CV10 0NZ	1
30 & Ivydene, Grendon Road, Polesworth B78 1HB	1
Cow Lees Cottage, Astley Lane, Bedworth CV12 0NF	1
<b>TOTAL</b>	<b>23</b>

<b>EXPIRED SITES IN 2017/18</b>	
Slacks Farm, Pipers Lane, Ansley	1
Grendon Boarding Kennels	5
Nether Cottage, 72 Coton Road, Whitacre heath	1
Heathland Farm, Barnes Wood Lane, Nether Whitacre B46 2EF	2
Kingsbury Mile, Halloughton Grange Lane, Nether Whitacre B46 2HP	1
<b>TOTAL</b>	<b>10</b>