

NORTH WARWICKSHIRE LOCAL PLAN EXAMINATION

POSITION STATEMENT OF NORTH WARWICKSHIRE LABOUR GROUP

MATTER 3

- 1.1 The Group has no comments on the technical issues raised by the inspector in Issues 3.1 to 3.5. However the Group would like to re-emphasise its view that the Plan should seek to deliver an amount of new housing which will meet the Borough's future needs, including in particular needs for affordable housing, in full.
- 1.2 The Group notes that Issue 3.6 is concerned with the question of "economic uplift". We assume that this would involve an increase in the Borough's future housing requirement above the level that would be required to meet demographic needs as indicated in the ONS projections, in response to growth in the local economy. If this is the case, it would appear that the future occupiers of these additional dwellings would be households moving into North Warwickshire from outside the Borough. In all probability these households would move from immediately adjoining areas, such as Tamworth, Coventry and Birmingham. The Group has no objection to provision being made on this basis – but we consider that this should not be additional to any requirement for the Borough to meet the housing needs of these adjoining areas. So, if the "economic uplift" is set at 940, this figure should be subtracted from any requirement for North Warwickshire to meet housing needs generated elsewhere, in order to avoid double-counting.
- 1.3 In relation to Issue 3.7, the Group supports the provision of new housing in North Warwickshire to help meet the needs of Tamworth in line with previous commitments and Coventry in line with the joint Memorandum of Understanding. This is subject to the comments in para 1.2 regarding the need to avoid double counting with any provision made to allow for "economic uplift".
- 1.4 The Group also recognises that there is a significant shortfall in housing supply in Birmingham, and that there may also be a case for North Warwickshire to make additional provision at a realistic level to help meet this shortfall. However we are concerned that the proposal in the Plan to make provision for 3,790 dwellings to help meet Birmingham's needs has not been justified and that it has been made in isolation from an overall strategy and wider agreement with other areas within the Greater Birmingham Housing Market Area to meet the total shortfall. This position was set out in the Group's representations on the Submission Plan.
- 1.5 At the inspector's request the Council has now produced a note providing more information on the basis for the 3,790 figure (NWBC6). It should be noted that members of the Labour Group have been party to all the stages of decision making on the Local Plan, and despite requests for more information, the publication of this note is, so far as we are aware, the first occasion that this material setting out the rationale has been made public.

- 1.6 The Group understands that the figure is a “pragmatic” assessment based on an analysis of commuting trips between Birmingham and North Warwickshire, but we have struggled to follow the detail of the Council’s analysis and hope that a clearer explanation will be provided at the hearing. We continue to have concerns over the robustness of this assessment. In particular it is not clear to us why it is appropriate to base the calculation on commuting flows rather than, for example, on public transport accessibility to Birmingham or settlement size. If commuting flows are to be used, then we would have expected to see a full analysis of flows between Birmingham and adjoining areas, as a basis for a distribution across the whole Housing Market Area rather than an assessment for North Warwickshire in isolation.
- 1.7 The Group agrees with the Council that para 9.67 of the G.L.Hearn Strategic Growth Study (CD 8/23) concludes that even higher levels of housing growth for North Warwickshire than those proposed in the Plan would not be realistic for market capacity reasons. However this report provides no justification for the particular approach taken to calculating the 3,790 figure in the Plan, which is simply taken as a “given” in the report (see paras 4.56 – 4.63).
- 1.8 The Group therefore remains of the view that there is no clear justification for the level of housing provision to meet Birmingham’s needs proposed in the Plan. Unfortunately the evidence does not provide a clear justification for any alternative level. We believe that the only pragmatic approach at this stage is to exclude this “aspirational” element from the assessment of housing needs at this stage. We recognise that the Plan will then need to be reviewed as a matter of urgency as soon as a wider agreement on the distribution of the Birmingham’s needs within the Birmingham Housing Market Area has been reached.
- 1.9 In relation to HS2 (raised in Issue 3.8), the Group would draw attention to the fact that although the route of HS2 passes through the Borough, there are no proposed stations within North Warwickshire. The nearest station will be at Birmingham Airport, and the Group understands that there are already plans for substantial development in that area to take advantage of the opportunity it provides. The construction of the new railway will have a substantial impact on the environment and on transport particularly in the north of the Borough, throughout much of the plan period, and this may well have a temporary negative impact on the attractiveness of this area to investment.
- 1.10 The Group’s comments on Issue 3.9 are set out in paras 1.4 to 1.8 above.
- 1.11 The Group has no comments to make on Issues 3.10, 3.11 or 3.13.
- 1.12 With reference to Issue 3.12, the Group would draw attention to table 4 of the Council’s note 3 (NWBC6). This shows that net dwelling annual completions in North Warwickshire have rarely exceeded 200 in the period since 1996/7. NWBC10, which is a table showing expected housing delivery over the plan period, indicates that to meet the proposed housing requirement annual completions will need to rise from around 250 in the current year to over 600 in 2023/4 and to remain at over 500 for the remainder of the plan period. This is plainly very challenging, and we would agree with what we understand to be the conclusion of para 9.67 of the Strategic Growth Study (CD8/23) that it is unrealistic to think that an even higher level could be achieved.