

Reference ID SPL343

Taylor Wimpey

# North Warwickshire Local Plan Examination

Matter 3: Housing Requirements

**Matter 2: Other legal compliance  
Issues and questions****Questions 3.1 to 3.2 - OAN**

- 1.1 This section addresses the Council's approach towards the Objectively Assessed Need for Housing (OAN) and the strategy for meeting further unmet need from outside of the Borough and represents the response to Policy LP6.
- 1.2 The methodology for calculating this figure is underpinned by evidence in the Coventry and Warwickshire Updated Assessment of Housing Need (UAHN) (**CD8/10**), published in September 2015. References are made to this document by the Council, however it is also acknowledged that a more recent document has been published for the Coventry and Warwickshire Councils in August 2016 to account for more up-to-date population and household projections. Additionally, the ONS are expected to publish the latest 2016-based household projections in September 2018. Broadly speaking, this considers that the calculations in the September 2015 update remain robust for the purposes of plan making and has informed the development of emerging Policy LP6 of the consultation Plan.
- 1.3 The relatively recently published Inspector's report (28 July 2017) into the Warwick Local Plan made reference that "Coventry would not be able to meet all of its own identified housing needs" (paragraph 70). A Memorandum of Understanding "sets out the Objectively Assessed Need (OAN) for each local authority within the HMA" and "sets out the agreed distribution of the shortfall within Coventry to the other local authorities in the HMA" (paragraph 14).
- 1.4 There is, however, some concern over the way the Council has interpreted the findings in the 2015 UAHN, which appears to have confused some of the issues in the calculation of housing need.
- 1.5 As set out in paragraph 7.33 of the North Warwickshire Draft Submission Local Plan, "North Warwickshire sites within two Housing Market Areas of Coventry & Warwickshire and Greater Birmingham". Table 1 of the Draft Submission document includes the District's emerging housing requirement of 5,280 dwellings (or 264 dwellings per annum) to be met in the period 2011 to 2031. The table indicates the following components of the Council's OAN:
  - The starting point for this need is 3,800;
  - The starting point is adjusted to account for an economic uplift from the Coventry and Warwickshire and Birmingham Housing Market Areas (HMAs) (+940), before taking a further uplift (+540) for a redistribution of Coventry's unmet need. Increase to 5,280; and
  - The Draft Submission now includes an additional 528 dwellings that has then been added to extend the Plan period up to 2033, meaning that the housing need from 2011 to 2033 is 5,808 dwellings (or 264 dwellings per annum).

- 1.6 Although RPS agrees with the newly introduced mechanism to extend the Plan up to 2033, there is a misunderstanding in the way the Council has interpreted the uplift from the OAN starting point, illustrated under heading II.
- 1.7 The 2015 UAHN indicates that the OAN for North Warwickshire is 4,740 over the Plan period 2011-2031 (Table 53 refers), which includes an uplift to support market signals and to improve affordability. This, the 2015 UAHN states, is included as part of the calculation for OAN in North Warwickshire and is not associated with the economic uplift from the neighbouring HMAs or the unmet need from Tamworth, these are separate uplifts. Although this does not affect the end OAN figure, this is an important factor that needs to be amended for clarification and consistency with the wider HMA. The OAN for North Warwickshire should therefore be correctly represented as 4,740 (as illustrated in Table 35 of the UAHN).
- 1.8 It is acknowledged this Plan is proceeding along NPPF1 and that whilst the NPPF2 standard OAN would see the Council's housing need decrease from 237 dwellings per annum to 169 dwellings per annum, the position in the wider HMA however remains largely unchanged, which is bolstered by further expected increases in Coventry's housing need.
- 1.9 Under current arrangements, it is still necessary to consider housing need at a HMA level. As such, when the housing need in Coventry and Warwickshire is revisited in the future, it will be necessary to consider whichever new methodology is in place (given the Government's stated intentions of revisiting the standard approach to OAN) however it is not appropriate to employ this emerging methodology at this stage. To do so would be a departure from the evidence base utilised in a number of recent Local Plan Examinations in the HMA and would affect the Memorandum of Understanding, along with the transitional arrangements of NPPF2.

**Question 3.8 - Impact of HS2?**

- 1.10 There is little evidence that this has occurred, given the potential significant implications for North Warwickshire of this taking place during the Plan period, it should feature within the Council's evidence base not only relating to OAN, but implications for landscape etc.

**Question 3.9 - GBHMA Distribution**

- 1.11 As addressed within RPS Matter 1 Statement, given the lack of political engagement to agree a methodology for the actual distribution and apportionment of GBHMA overspill growth, it is essential that this Plan deals with the issue. This is the first Local Plan Review within the GBMHA that has reached the Examination stage and the responsibility rests with this Plan to deal with the issue.

- 1.12 Unfortunately, and despite previous assurances and specifically those indicated during the Birmingham Development Plan Examination the document, whilst helpful in exploring potential spatial approaches to strategic scale growth locations provides no commitment to the distribution of numbers and there remains considerable concern about the robustness of the document and in particular its approach to establishing the overscale of the shortfall.
- 1.13 The SGS does not purport to present findings at local authority level (paragraph 3.24), and in RPS view, in comparison with a recently publicly tested Development Plan for Birmingham limited weight, should be afforded to it, particularly in relation to the reduction it is suggesting arising from Birmingham in the period to 2031.
- 1.14 Given the scale of Birmingham City Council's unmet housing need identified through the adopted Birmingham Development Plan (37,900 dwellings to 2031) and the emerging shortfall identified by the Black Country Authorities through their current review process (estimates of 17-22,000+ dwellings to 2036) it is inevitable that North Warwickshire will need to make a significant contribution through the Duty to Co-operate process.
- 1.15 In absence of any substantive evidence that political agreement will be reached across the whole HMA level on this issue, it will be down to the individual authorities within the HMA to ensure they are effectively dealing with the issue. The opportunity and responsibility exist through this Plan and the MoU process on a bilateral basis between North Warwickshire and Birmingham City Council ('BCC') to establish an 'appropriate methodology for dealing with its 'appropriate contribution' to the unmet needs of Birmingham.
- 1.16 North Warwickshire has signed an MoU with Birmingham City Council in September 2016 to meet 3,790 dwellings arising from Birmingham's shortfall, though there is no certainty about how the remainder of Birmingham's shortfall will be met. The Birmingham Development Plan was adopted with a requirement to have agreed measures in place to meet its shortfall within three years. Whilst the MoU between North Warwickshire and Birmingham is a good first step, this needs to be revisited at a later time as part of a wider agreement with all relevant Birmingham HMA authorities confirming how the shortfall will unequivocally be met.

### **Question 3.10 - Housing Delivery**

- 1.17 The Council has included a number of sites for proposed allocation, included as part of Policy LP39. The Council's allocations strategy proposed under this policy is presented as a residual mechanism, which determines the numbers of allocations needed after first removing completions/commitments to-date and including a windfall allowance and flexibility buffer. As indicated in Table 7, this reduces the residual requirement from the total 9,600 dwellings to 6,821 dwellings. As indicated above it is considered that the Council's housing requirement has been

underestimated and has not properly accounted for factors including 500 dwellings unmet need from Tamworth, in addition to further unmet need for this authority. The figure should therefore be a minimum of 10,100 dwellings.

1.18 Notwithstanding this, RPS also has a number of concerns relating to the Council's housing supply and the ability of those sites included to deliver growth in the next five years.

1.19 As part of its Regulation 19 representations, RPS submitted a detailed 5YHLS report. This report has been prepared against the Council's latest Five-Year Housing Land Supply Statement (5YHLS) and the Local Plan Housing Trajectory (LPHT) which includes a more detailed account of annual delivery than included in the 5YHLS.

1.20 This report indicated that the Council has taken an overly optimistic view of housing delivery in the immediate five-year period 2017/18 to 2021/22, which has given little consideration to the timings involved in developments to be presented from inception to completion. RPS considers that the Council's current five-year land supply is closer to 2.2 years, when balanced against the Council's position of 5.1 years.

1.21 The assessment prepared by RPS exposes vulnerability in the Council's immediate supply of housing which has implications for the Local Plan process. Although RPS recognises that the five-year land supply process for the Local Plan and Development Management purposes operate differently, there are a number of shared assumptions which are pertinent for consideration, which are detailed below:

- Flexibility: The Council has included a 5% buffer to the housing requirement as part of the 5YHLS, a feature which has become confused with the approach to calculate the housing land supply. For the Local Plan, RPS does not consider that it is appropriate to 'uplift' to the buffer in this way which conflates the requirement and the supply of housing. A buffer should be applied, however this should be provided as part of a flexible allocations strategy, which will allow additional sources of supply beyond the requirement. Such an approach has been advocated recently as part of the Nuneaton and Bedworth Local Plan Examination, and at Stratford on Avon, where the Inspector determined it necessary to include a supply of reserve sites, equivalent to 20% of the housing requirement (paragraph 68 refers). In addition to the Council's allocations, the Draft Submission Plan also introduces a new Reserve Sites policy (LP39a) which introduces two new sites for consideration, with a potential capacity of around 750 dwellings. This represents a potential additional capacity of 7.7% when considered against the overall housing requirement. RPS considers that the Council should go further in delivering a wider quantum and type of reserve site.

- **Past Delivery:** Although the Council has made a provisional flexibility allowance for a 5% uplift to the housing requirement, a buffer should be considered as part of the land supply process, which the Local Plan should demonstrate upon adoption. As part of the land supply calculation, RPS considers that the Council should include a 20% buffer. RPS has provided evidence to highlight failures in past rates of delivery when set against historical growth targets. Over the past 15 years, the Council has only met its requirement once (2016/17) and, as such, has generated a shortfall to date of 515 dwellings (by its own account – RPS consider this to be higher). The application of a 5% buffer is not considered to be appropriate or robust in the interests of plan making. A 20% buffer should instead be included.
- **Completions:** Although RPS has not considered the Council's completions forensically, it is clear that there are sources of supply which should not be included within the completions to date, nor included in the future housing supply. In particular RPS does not consider that it is appropriate to include Care Homes as component of the supply, a matter which was debated as part of the Stratford Local Plan Examination, where these (C2) sites were subsequently removed from the supply, as the OAN had not catered for them (paragraph 383 refers). The UAHN 2015 does not make this distinction and as such, RPS would advise that the Council remove these sites from the overall completions and future commitments.

1.22 **Delivery of Supply:** The Council's 5YHLS statement includes a number of sites, either committed or proposed for allocation, which have been included within the first five years of delivery, as illustrated on the LPHT. RPS observes that a number of sites are expected to come forward from 2017/18 onwards that have not yet been committed or given any certainty in terms of delivery. In context, the Council's 5YHLS includes an immediate supply of 1,973 dwellings, however the Council's own LPHT takes an opposing view of delivery, with only 1,186 dwellings included in the same five-year period. RPS has taken a separate view of the Council's immediate deliverable supply, which is included, in detail as part of Appendix 2 of the Reg 19 reps. The review of these sources indicates a deliverable supply of 978 dwellings.

1.23 As indicated above, RPS has a number of immediate concerns related to the Council's deliverable supply. Although a number of sources may well come forward within the Plan period, there is no certainty that this will occur within the next five years. RPS considers that it is necessary for the Council to revisit alternative sites that may be able to make an immediate contribution towards the supply in order to address this shortfall in delivery.

- 1.24 Although the new policy LP39a includes a provision for land to be released if there are difficulties in maintaining the Council's annual delivery target, the two sites proposed by the Council are reasonable in size, and these too would need to be subject to the same necessary planning considerations which would require considerable lead in and delivery time. RPS would consider it more appropriate to allocate not only a greater number but a greater range of sites that can be delivered in the short term.
- 1.25 RPS is aware that the Council has now published an updated 5YHLS position (**CD8/13A**), which indicates a diminished supply, which now stands at 4.8 years. This is clearly troubling, given recent rates of housing delivery and the concern is compounded by the fact that this supply figure is already embedded with sources from the emerging Local Plan, which are subject to a number of unresolved objections.
- 1.26 The July 2018 5YHLS position does not include a supporting schedule of sites. It is also noted that there are differences with the total supply submitted as part of this document and the Council's proposed housing trajectory, operating from 01 April 2018 (**NWBC10b**). As such, it is not possible to undertake a like-for-like assessment of the deliverable supply and it would be expected that this information will be presented at a later stage of the Examination. Nonetheless, RPS has undertaken an interim assessment of the July 2018 5YHLS position, considering key sites of concern and presenting an updated assessment of factors relating to delivery.
- 1.27 This interim assessment, included as part of **Appendix 1** below, which presents an updated view on the Council's 5YHLS, and indicates that the supply position should be revised from 4.8 years to 2.9 years.
- 1.28 It is recognised that the Council may now be considering a different trajectory for these sites and RPS reserves the position to interrogate these further at an appropriate juncture.

## Appendix 1 - 5YHLS Assessment

1. The Council's latest land supply position is provided as part of the Five-Year Housing Supply (FYHS) statement, which follows the period 01 April 2018 to 31 March 2023. Although this document is not date stamped, it is understood that this was published in July 2018, and presents a view that the Council can demonstrate a 4.8 year supply of housing land.
2. This document was published further to the Ansley Appeal in March 2017, which took the view that the Council could only maintain a supply of around 3.5 years (paragraph 20 refers). As part of that appeal the Inspector took the view that the Council's housing requirement should be 264 dwellings per annum. This would exclude development arising from Birmingham which would be a matter for further clarification through the NWLP. The Inspector gave greater certainty over the provision of unmet need arising from the Coventry and Warwickshire HMA and included the contribution from Coventry as part of the housing need figure for North Warwickshire.
3. There have been a number of recent appeal decisions in North Warwickshire District, which provide views on the Council's land supply position, which are summarised below:
  - Delves Farm, Wood End – 14 dwellings. Dated 27 September 2017, both parties agreed that the Council could not demonstrate a five year supply of housing. The Council indicated that since the Ansley appeal, the supply position has since increased to 4.5 years, however in any event the Inspector took the view that Paragraph 14 of the NPPF should be engaged (paragraph 17 of the report refers);
  - Newton Farm, Newton Regis – 6 dwellings. Dated 27 November 2017, the Inspector's report notes a disagreement between the Council and the Appellant over the presence of a five year land supply position. The Inspector does not offer a view here on the precise level of the Council's land supply position, however does indicate that Paragraph 14 of the NPPF should be engaged, on the grounds that the policies for the supply of housing are out of date, taking an overall view on the sustainability of the proposal; and
  - Land east of Pooley Lane – 40 dwellings. Dated 19 January 2018. The Inspector was unable to come to a definitive view on the housing land supply position, however reflected on the fact that, in this instance, the harm of the proposed development would have outweighed a planning balance scenario in the absence of relevant policies for the supply of housing being found out of date. As part of this Appeal the Inspector was also invited to comment on the impact of the proposed development on the Meaningful Gap, as the site is located in the area between Polesworth and Tamworth. Although the appeal was refused, the Inspector indicated that the site would not encroach into

the Meaningful Gap or interject into the open countryside in a way that would undermine the separate identifies of the settlements or their separation from each other (paragraph 14 refers).

4. RPS has undertaken an assessment of the Council's 5YHLS covering the land supply period expressed in the Council's March 2017 5YHLS statement. Since the production of this report in January 2018, the Council has provided an updated 5YHLS as a part of the Local Plan review, however this is not supported by a detailed schedule of sites. The Council now state that have a housing supply of 4.8 years, which has dropped from the previous year. The summary of the Council's position alongside the RPS proposed adjusted position is replicated below, albeit this may need to be amended once the Council's full supply:

*Table 1 Housing Land Supply Comparison*

Five Year Requirement	LPA 5YHLS (20%)	RPS 5YHLS (20%)
Annual Requirement	264	264
<b>Requirement</b>		
Requirement 7 years (April 2011 - April 2018 2017)	1,848	1,848
Completions to Date (April 2011 – April 2018)	1,255	1,255
Shortfall/Surplus	593	593
<b>Requirement 5 year Supply</b>		
Five year requirement April 2018 – April 2023	1,320	1,320
Shortfall	593	593
Requirement + Shortfall	1,913	1,913
Total Requirement + 20% Buffer	2,296	2,296
<b>Annual Requirement</b>	<b>459</b>	<b>459</b>
<b>Supply</b>		
LPA based on supply in 31 March 2017 HLS report. RPS supply taken from 5YHLS report (Section 8 of Housing Land Supply Report, included as part of <b>Appendix E2</b> )	2,190	1,348
<b>Total Supply</b>	<b>2,190</b>	<b>1,348</b>
<b>Years Supply with 20% Buffer</b>	<b>4.8</b>	<b>2.9</b>

5. The Council's adopted housing requirement as part of NWCS Policy NW5 presents an annual target of 175 dwellings per annum (dpa). As indicated in Section 3 this policy is now considered to be out of date, and newer evidence exists for the Housing Market Area as part of the 2015 Strategic Housing Market Assessment, which indicates that the need for the Borough is 237 dwellings per annum. The Council's housing requirement for the purposes of the housing land supply is uplifted to 264 dwellings per annum, which accounts for unmet need arising from Coventry, as agreed through the MoU between the Coventry and Warwickshire authorities.
6. The housing requirement of 264dpa is to be applied for the purposes of the housing land supply assessment. This is a position held the Council for some period of time and supported by previous Inspectors.
7. There are, however, a number of concerns relating to the Council's proposed supply. The RPS assessment indicates that there are a number of supply sources which have been overestimated by the Council, namely relating to sites with planning permission yet to commence, and emerging allocations which are not sufficiently advanced to include within the immediate supply.
8. RPS is of the view that the Council's land supply position is not 4.8 years, but is closer to 2.9 years (as indicated in the table above) as too much reliance has been placed on significant sites which do not benefit from extant planning applications and an unrealistic view has been taken with regard to past housing delivery. Accordingly, RPS submits that the relevant policies for the supply of housing cannot be considered up to date for the purposes of the Local Plan and it cannot therefore be considered sound at the point of adoption.
9. It is expected that all of the sites and assumptions regarding their delivery will be tested later in the Examination process, however a number of high level observations have been made below as part of this Statement which draws on the evidence submitted as part of the NWLP Regulation 19 consultation process.

#### C2 Uses

10. RPS does not dispute the inclusion of C2 uses within the Council's supply. The NPPG recognises that it is appropriate to include C2 uses within the supply to count against the housing requirement (paragraph 3-037-20140306 refers) though RPS does not consider that the Council has correctly accounted for the housing requirement to balance this supply against. This matter was discussed at length as part of the Stratford Core Strategy and reported by the Inspector in June 2016. On balance, the Inspector made the following assessment:

***“In the circumstances, because the OAN does not include an assessment specifically for Class C2, it is inappropriate for the Council to include C2 uses in its housing land supply calculations. The distinction that it seeks to draw between bed spaces and self-contained units does not address this basic problem, but in any event such a split should have been identified and justified when such needs were being assessed. Accordingly, to the extent the Council has evidence, it is out-of-date and is not a robust assessment of the need for residential institutional C2 accommodation, against which to count supply”*** Paragraph 383

11. RPS does not consider that the equivalent evidence is available at a local level to justify the additional uplift to the OAN necessary to address this component of housing need. As such, following the recommendations of the Stratford Inspector, it is recommended that this source of supply cannot be relied upon for the purposes of the housing land supply and should be removed from the forward supply and completions to date.
  
12. The Council’s supply includes reference to two Care Homes, which have been under construction during the current plan period from 2011 onwards. Table 6 of the Council’s Housing Land Supply indicates that there are two sites in this supply category. To date, 50 dwellings have been completed on these sites and there are three extant dwellings yet to deliver on sites. As part of this assessment, RPS has removed the historical 50 completions from the supply. The consequence of this action increases the shortfall to date by a further 50 dwellings, which presents a shortfall of 565 dwellings, against the Council’s figure of 515 dwellings.

Evidence of Historical Delivery

13. NPPF1 requires that the housing land supply should be subjected to a flexibility buffer based on past performance (paragraph 47, bullet 2). As a minimum, a 5% buffer should be added though the NPPF suggests that this should be increased to 20% where there has been a record of persistent under delivery of housing (bullet point 2 of NPPF paragraph 47 refers). The Council’s housing land supply statement provides no justification for why the Council should be considered a 5% authority, particularly when the approach in the latest 5YHLS **(CD8/13a)** adopts a 20% position.
  
14. Assessment of the Council’s past performance in housing delivery, when set against previous plan targets from the Warwickshire Structure Plan and the West Midlands Regional Spatial Strategy, indicates that the over the past 15 years the Council has consistently underperformed against plan targets, with significant cumulative shortfalls in delivery from 2001/02 to 2015/16. The evidence indicates that the Council struggled with housing delivery during the recessionary period (between 2008 and 2013), however this is also reflective of the wider period either side of the economic downturn, where delivery has again failed to align with the targets for growth. The table supporting this is provided below:

Year	Net Housing Completions	RSS (2001 – 2013: 213dpa)	WASP 2001 – 2011 and the Local Plan 2001 – 2011: 185 dpa	Supply against Core Strategy (2011– 2017: 264 dpa)
2001/02	171	-42	-14	
2002/03	100	-113	-85	
2003/04	120	-93	-65	
2004/05	104	-109	-81	
2005/06	106	-107	-79	
2006/07	167	-46	-18	
2007/08	142	-71	-43	
2008/09	106	-107	-79	
2009/10	79	-134	-106	
2010/11	98	-115	-87	
2011/12	75	-138	-110	-189
2012/13	38	-175		-226
2013/14	119	-94		-145
2014/15	223			-41
2015/16	251			-13
2016/17	363			99
2017/18	186			-78
<b>Total</b>	<b>2,262</b>	<b>-1,344</b>	<b>-767</b>	<b>-593</b>

15. Whilst the Council has exceeded its target in 2016/17 for the first time in 14 years, this is not considered significant enough to overshadow the Council's historical performance and does not provide any certainty that the figure will be exceeded, consistently, in the future. When set against the current housing requirement, the Council is already showing a shortfall of 593 dwellings which has accrued over the past five years. This represents nearly two full years of requirement that the Council has to provide in addition to its annual figure to break even.

16. RPS agrees that it is reasonable to apply the 20% buffer to the requirement, which reflects past performance in delivery and the persistent shortfall against housing targets. A 20% buffer should also be applied to the Council's shortfall.

#### Supply of Sites

17. RPS has undertaken a review of each of the large sites in the Council's supply, which it considers will be addressed at later sessions of the Examination. These representations were included in RPS Regulation 19 representations. This assessment of sites follows those included within the detailed schedule within the August 2017 5YHLS paper. It is noted that there may be

some differences in the actual supply of sites, however this has yet to be presented by the Council. A fuller review of the supply can be prepared once this information is available.

18. Following this process RPS considers the Council’s assessment has been overly-optimistic. In terms of site delivery, including lead in times and annual yield, the Council has not included evidence about how these assumptions have been defined. RPS has prepared evidence to suggest how each of the Council’s sites could be delivered, having regard to the status of a planning application, obstacles to delivery and expected build rates.
19. Although some of the sites within the typology benefit from planning status there are a number of sites which do not, yet the Council is expecting delivery from these sites from 2017/18 onwards (as indicated in the Local Plan Housing Trajectory). In terms of these sites, the RPS considers that the potential capacity from these sources within the five-year period is more likely to be significantly reduced.
20. By way of example, attention is drawn to the inclusion of Robey’s Lane (emerging NWLP allocation H13). The Council has included this site for 40 dwellings per annum, commencing from 2017/18 onwards as part of the 2017 5YHLS. Although there is currently a live application along Robey’s Lane for 500 dwellings with the Council, however this is not included within the parcel of land identified by the Council for allocation and remains subject to a number of objections and technical considerations to be addressed. Part of this emerging allocation is presently used for a go-karting track, which accesses onto Robey’s Lane and RPS understands that there is currently a lease in place for this use until 2030. As such, RPS considers that the Council’s reasoning for including this site lacks justification and cannot be relied upon for the 200 dwellings in the five year period as currently planned.
21. As part of the RPS assessment 37 sites have been considered in terms of the robustness of the assumptions and expected delivery rates. RPS is challenging delivery assumptions from 15 sites in total and a summary of the proposed changes is included below.

*Table2 Summary of Differences in Supply Sources*

Category	Site Address	LPA Capacity in 5YHLS	RPS Net Capacity	Difference in Calculation
Adopted LP- Land Allocations and Proposal	Britannia Mill, Coleshill Road, Atherstone	59	20	-39
<p><i>No further applications submitted – One thing to note that the site was ‘removed on 16 March 18’ – we originally took into account that site needed selling, think we can still hold our 20 based on the high amount of contamination on site and no additional applications to discharge several conditions.</i></p>				

Category	Site Address	LPA Capacity in 5YHLS	RPS Net Capacity	Difference in Calculation
Large Sites of 10+	Phoenix Yard, Church St, Atherstone	69	0	-69
<p><i>Initially took a view that the development had stalled since 2013. Since then an application for works to trees protected by a tree preservation order has been submitted and approved suggesting that work may be starting again on-site. It is also noted that the application is creeping towards expiry - last variation application was approved October 2013.</i></p>				
Large Sites of 10+	Kingsbury Hall, Kingsbury	29	14	-15
<p>No change</p>				
<p><i>Two applications for discharge of conditions and reserved matters application have been submitted May 2015, and both are still awaiting decision. Additional information has recently been submitted to the RM application. Suggest that the 40 units could be delivered within the 5 year period.</i></p>				
Large Sites of 10+	Land to the north of Overwoods Road, Hockley	88	60	-28
<p><i>Originally suggested that all 88 would not be completed within the 5 year period due to an application for phase 1 delivering 26 houses was submitted (and since been approved). Since, an application for the remaining dwellings has been submitted May 2018, and a discharge of conditions application submitted August 2018. This may suggest that the development may be completed within the 5-year period. I think maybe lowering the difference allowing few a few more to be delivered?</i></p>				
Large Sites of 10+	Durnos Nursery, Atherstone	121	22	-99
<p>No change</p>				
Large Sites of 10+	Grimstock Hill, Coleshill	24	0	-24
<p>No change</p>				
Large Sites of 10+	Land north of Nuthurst Crescent, Ansley	79	10	-69
<p>No change</p>				
Emerging Allocations in Draft Local Plan	Land off Coleshill Road	72	44	-28
<p>No change – discharge of conditions still awaiting decision</p>				

Category	Site Address	LPA Capacity in 5YHLS	RPS Net Capacity	Difference in Calculation
Emerging Allocations in Draft Local Plan	Land at Holly Lane Atherstone (ATH20)	150	60	-90
<i>No change</i>				
<i>At the time of writing the previous report the site was for sale, however the site has now been bought by Kier living and a full application for 56 dwellings was submitted May 2018. Development may come forward within the next 5 years.</i>				
Emerging Allocations in Draft Local Plan	Land between Church Road & Nuneaton Road	100	0	-100
<i>Since the report, an application for 382 dwellings (allocated for 400) has been submitted. Outline application for what looks like a difficult site due to constraints (e.g. the minerals extraction and heritage assets)</i>				
Emerging Allocations in Draft Local Plan	Land west of Woodpack Farm	32	0	-32
<i>No change</i>				
Emerging Allocations in Draft Local Plan	Land west of Robey's Lane	200	20	-180
<i>No change, application still pending decision. No sign of an application for phase 2 which the council said that they're waiting for to assess the two impacts together.</i>				
Emerging Allocations in Draft Local Plan	Land south of Shuttington Village Hall	24	0	-24
<i>No change</i>				
Emerging Allocations in Draft Local Plan	Land north of Orton Road	72	30	-42
<i>Change – application has been granted August 2018 for 100 dwellings. RM application has not been submitted.</i>				
Care Homes	2 x Sites	3	0	-3
<b>TOTAL</b>		<b>1,206</b>	<b>280</b>	<b>-842</b>

22. The assessment highlights a difference of 842 dwellings between the Council's proposed supply and the adjustments proposed by RPS. The adjustments above indicate significant concerns with the Council's supply, which would have the effect of reducing the supply from 2,190 dwellings, to 1,348 dwellings.

23. When this supply figure of 1,348 dwellings is set against the wider supply assumptions, this would present an overall housing land supply of 2.9 years and continues to highlight the severity of the Council's shortfalls against current plan targets.