

**NORTH WARWICKSHIRE BOROUGH COUNCIL**  
**LOCAL PLAN EXAMINATION**

**HEARING AGENDA**

**MATTER 3, HOUSING NEEDS AND REQUIREMENTS**

Wednesday 26 September 2018, commencing 0930

Council House, South Street, Atherstone CV9 1DE

**Participants:**

North Warwickshire Borough Council (NWBC)  
North Warwickshire Labour Group (NWLG), SLP117  
Gladman Developments Ltd. (GDL), SLP330  
Hallam Land Management Ltd. (HLM), SLP336  
Bovis Homes Ltd. (BHL), SLP158  
Cllr David Parsons (CDP), SLP172  
Prologis UK Ltd. (PUL), SLP446  
Taylor Wimpey UK Ltd. (TWU), SLP343  
Cathedral Agricultural Partnership and the White Family (CAP), SLP345  
Richborough Estates (RE), SLP430  
Home Builders Federation (HBF), SLP289  
Birmingham City Council (BCC), SLP105  
Ciel Property Holdings (CPH), SLP113  
Severn Trent PLC (STP), SLP168  
Tamworth Borough Council (TBC), SLP324  
IM properties (IMP), SLP439  
Hodgetts Estates (HE), SLP429  
CPRE Warwickshire (CPRE), SLP447  
Stella Doggett (SD), SLP338  
Mark Doggett (MD), SLP278

**Notes:**

- i. Issue 3.6 will start no sooner than after the morning break, scheduled for 1100 to 1120.
- ii. Participants named in (brackets) against an item may be invited to open the discussion, but that is optional. [Square brackets] denote examination documents.
- iii. It is not intended to repeat introductory matters [INSP1-7], or those covered in earlier sessions. Participants should consult those documents, and others in the examination library, in framing their contributions.
- iv. This agenda is provisional and flexible, and refines the issues and questions [INSP5] primarily on the basis of submitted position statements.
- v. It may not be necessary to cover all issues and questions, and the agenda does not seek to confine discussion to only those points set out below.

**ISSUES AND QUESTIONS**

3.1 Is Local Plan ('LP') strategic objective 2 consistent with policy LP6 and the NPPF 2012 in seeking to provide for the housing needs of the Borough?  
(NWBC)(CAP)<sup>1</sup>(STP)

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<sup>1</sup> Who also suggest a modification to policy LP6 such that infrastructure provision supports delivery, rather than governs it.

- 3.2 In respect of objectively assessed housing needs ('OAHN') the LP is based primarily on a Strategic Housing Market Assessment covering Coventry and Warwickshire Housing Market Area authorities ('SHMA')[CD8/10]. Is that SHMA an appropriate evidence base? (GDL)(HBF)(STP)
- (a) what is the effect of 2014-based household projections? [AD8](NWBC)
- (b) are the findings of the SHMA consistent with those of the Greater Birmingham Housing Market Area Strategic Growth Study published in February 2018 ('SGS')[CD8/13A]? If not, what are the reasons for any differences? (BCC)(HBF)(IMP)(PUL)
- (c) are student numbers appropriately assessed in the SHMA?<sup>2</sup>(CPRE)
- 3.3 LP table 2, consistent with the SHMA, sets out that the overall OAHN for North Warwickshire is 237 homes annually ('dpa') to 2031. Is that robust? (TWU)
- (a) with reference to [INSP2], does that 237 dpa figure take account of local planning authorities' policies or those of the Local Enterprise Partnership?<sup>3</sup>(GDL)(RE)(IMP)
- i. If so, what is the extent of any associated uplift? (HBF)
- (b) has that figure been suitably adjusted to reflect local circumstances, including demographics, headship rates, employment trends, and market signals in accordance with the Planning Practice Guidance?<sup>4</sup>
- (c) what is the precise basis for the uplift in OAHN on account of forecast economic growth and improving housing affordability? (HBF)
- i. Is there any conflict with the judgement in Oadby?<sup>5</sup> (STP)
- 3.4 Have the housing needs of all members of the community, including for affordable housing, been robustly assessed and translated into policy? (CPH)(HBF)(MD)<sup>6</sup>
- (a) does the forecast level of affordable housing need in LP paragraph 8.10 accord with that of the SHMA? If not, why not?
- (b) what is the total quantity of affordable housing predicted to be delivered over the plan period relative to needs?
- 3.5 Are traveller needs (as defined in Planning Policy for Traveller Sites 2015, 'PPTS') based on robust evidence, namely the Accommodation Assessment of June 2013? [CD8/14]

<sup>2</sup> Raised also in PS.M3.02 (Craig Tracey MP), and via SLP294.

<sup>3</sup> Noting SHMA paragraphs 4.48 & 4.55 in particular, the observations of the Coventry and Warwickshire LEP (SLP288), the examining inspector's report into the Stratford-on-Avon Core Strategy of 20 June 2016, and [AD15] regarding potential economic effects of greater automation.

<sup>4</sup> In accordance with PPG Reference ID: 2a-017-20140306, 2a-018-20140306, 2a-019-20140306.

<sup>5</sup> Oadby and Wigston Borough Council v Secretary of State for Communities and Local Government & Anor [2016] EWCA Civ 1040 (27 October 2016).

<sup>6</sup> Noting SHMA paragraph 6.59 in particular.

-Morning break scheduled for 1100 to 1120-

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 respectively).<sup>7</sup> With reference to INSP2, is that approach consistent with the approach to establishing OAHN in the NPPF2012 and PPG? (HLM)(HBF)(IMP)

(a) what is the basis for that apportionment? [PS.M3.01, Appendix 2, paragraphs 2.6 and 2.7]

(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 North Warwickshire relate to the unmet needs of TBC without the context of the GBHMA and previous commitments in the Core Strategy (CS)? (TBC)(STP)

i. what is the latest situation in Tamworth regarding anticipated shortfall against housing needs and the mechanism for resolving this? (TBC)(BHL)

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? (BCC)(NWLG)(CPRE)(RE)(IMP)

(a) Is accommodating an additional 540 homes redistributed from the CWHMA justified and appropriate, including in terms of the exercise of the Duty to Cooperate ('DtC')? [AD14, 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 MoU. Is there yet an outcome? Does that have any meaningful effect for the LP? [AD6]

(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?<sup>8</sup> If not, why not? What is a robust assessment of likely housing needs arising in the GBHMA that would be unmet by 2031/2033?(GDL)(CPRE)(HBF)

(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? [INSP2, paragraph 35]

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<sup>7</sup> Noting NWBC's position statement [PS.M3.01, paragraph 3.6.2].

<sup>8</sup> Table 2, page 16, indicates a shortfall in supply of 28,150 dwellings to 2031 (and a further 32,700 to 2036). That differs from the 37,900 undershoot forecast to arise in the Birmingham City Plan.

- 3.8 In establishing the overall housing requirement, has appropriate account been taken of the wider economic context to NWBC, including HS2?  
[CD8/8](STP)(GDL)
- 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 NPPF2012? If not, how should it be modified?  
[NWBC6](BHL)(CDP)(TWU)(HBF)(STP)
- 3.10 As set out in NWBC2, the LP plan period is intended to be 2011 to 2033. Examination document CD8/13A set out annual completions since 2011. The CS target was 175 dwellings annually (excluding 500 from TBC). NWBC11, table 2, responds to INSP2 in setting out a table of annualised housing delivery relative to development plan requirements that applied in each. In that context, what should the five year housing land supply requirement be (5YHLS)?
- (a) Is the shortfall of 593 dwellings in the LP accurate?<sup>9</sup>
- i. Should any shortfall relative to 540 CWHMA homes and 3,790 GBHMA homes also be counted?
- ii. Are housing requirements given for years since 2011/12 in NWBC11 accurate? (HLM)
- (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 appears to conflict with the approach in examination document CD8/13A, where the accrued shortfall in delivery since 2011 is added to the baseline OAHN. What approach accords with the PPF?
- i. Is that principally a matter of phrasing (i.e. anything since 2011 is 'shortfall', anything beforehand is 'backlog')?
- (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 the SHMA/ OAHN?
- (d) has there been persistent under-delivery of housing to justify a 20% 5YHLS buffer in addition to addressing any shortfall?(NWBC)<sup>10</sup>(TWU)
- (e) Is there any evidence to indicate that household formation rates may have been constrained by supply across the HMAs previously?(HBF)
- (f) Should any shortfall be addressed within the first 5 years of the plan in accordance with the PPG,<sup>11</sup> i.e. as part of the 5YHLS requirement?
- 3.11 Is the windfall allowance of 60 dwellings a year set out in LP policy LP8 justified? Why does LP table 6 refer to planning applications rather than consents or completions? (GDL)(RE)

<sup>9</sup> Based on updated data, NWBC put that figure currently at 576.

<sup>10</sup> To clarify the approach proposed to ensuring flexibility versus a buffer of supply.

<sup>11</sup> Reference ID: 3-035-20140306.

- 3.12 What is the relevance of paragraph 9.67 of the SGS [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?<sup>12</sup> (RE)(STP)
- 3.13 Are housing delivery monitoring arrangements in LP chapter 15 suitably detailed and robust? [PS.M3.01, appendix 3](GDL)(HLM)
- 3.14 Any other issues not addressed above, including any relevance of the NPPF2018 and standard housing methodology?(TWU)(CPRE)

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<sup>12</sup> NWBC clarify that, as set out in SGS table 63, based on a requirement of 9,070 dwellings to 2031 at an annual rate of 572dpa represents a 1.8% growth in households compared to existing stock in the Borough.