

North Warwickshire Local Plan Additional SA – Method Statement

Introduction

- 1.1 On 14 December 2018, the Inspector examining the North Warwickshire Local Plan issued a progress note to North Warwickshire Borough Council [INSP12] to request that additional Sustainability Appraisal (SA) work is undertaken to assist the examination process.
- 1.2 The relevant text in the Inspector's progress note is as follows:
8. *Aside from the option of accommodating none of Birmingham's likely unmet needs, no alternative levels of provision to the 3,790 homes figure cited above have been assessed in the Sustainability Appraisal [CD1/2]. In order to ensure that a requirement proposed via policy LP6 is justified, the Council should undertake a comparative assessment of the impacts of the plan making provision to deliver a minimum requirement of 5,808, 7,963 and 9,598 homes.*
 9. *The middle figure of 7,963 homes is on the basis of accommodating approximately 2,155 dwellings for Birmingham based on 2011 Census data related to the functional commuting relationship between the two areas [AD24, PS.M3.01]. That assessment should be by way of an update to the Sustainability Appraisal, and must be undertaken without a predetermined outcome in mind. **Clearly, should the additional SA work indicate that a housing requirement figure of 9,598 is not the most appropriate in the light of reasonable alternatives, it would likely be necessary for me to significantly alter my interim findings in this note.***
 10. *Work to address the concerns of the Environment Agency and Historic England [SLP302, SLP341] should be made available in advance of hearings on examination matter 6 'planning and environmental constraints', and may inform the Sustainability Appraisal work referred to above. I may need to request further information thereafter in the event that there are significant issue remaining. In advance of hearings into site allocations, the Council's Settlement Sustainability Assessment ('SSA')[CD6/3B], updated to reflect present circumstances, should also be made available as supporting evidence.*
- 1.3 This statement sets out the proposed method for carrying out the additional SA work requested by the Inspector. The work would be undertaken by LUC, as was all the previous SA work on the Local Plan to date.

Proposed Method

- 1.4 It is intended that the approach to the SA used to date will continue for the additional SA work. This means using the same SA objectives as presented in the SA Framework (Table 2.2 of the submitted SA Report dated December 2017 [CD1/2]).
- 1.5 With respect to the SA work undertaken to date, three main aspects are particularly relevant to the additional SA work to be undertaken:
- The SA of the spatial options as set out in the Growth Options Paper (see paras 4.2 to 4.49 of the main SA Report [CD1/2]), which appraised alternative spatial strategies for delivering growth generated from within the Borough and for growth generated from outside the Borough.
 - The SA of Policy LP6 'Amount of Development' (paras 6.18 to 6.23 of the main SA Report [CD1/2]).
 - The SA of Policy LP39 'Housing Allocations', which sets out the findings of the SA of the cumulative effects of delivering housing at the allocations included in the Local Plan, together

with a summary of the findings of the SA of each individual site allocation (see paras 6.10 to 6.98 of the main SA Report [CD1/2]).

- 1.6 The additional SA work will draw upon and build on the work already undertaken described above.

High growth alternative

- 1.7 The highest of the three growth alternatives prescribed by the Inspector is the delivery of 9,598 homes over the plan period, rounded up in Table 7 of the Local Plan to 9,600 homes [CD0/1]. Included in this figure are 3,104 new homes that have already been built in the first part of the plan period (1,069 homes), the remaining capacity on existing planning permissions as 1 April 2017 (1,135 dwellings), and an allowance for windfalls from 2018 to 2033 (900 homes). This leaves a balance of 6,496 homes, plus a 5% allowance to ensure flexibility, choice and competition in the market for land (325 homes), giving a total of 6,821 homes for which site allocations have been identified in the Local Plan.
- 1.8 The site allocations to deliver the remaining 6,821 homes have already been appraised through the SA of Policy LP39. This SA sets out the cumulative effects against each of the SA objectives of delivering housing development at all of the sites allocated in the Local Plan which, after taking into account housing completions since 2011, sites with planning consent, and a windfall allowance, have the capacity to deliver the 9,598 dwellings if all come forward and are completed by the end of the Local Plan period (2033). This is supported by the appraisal of each individual site allocation as summarised in Table 6.12 and paras 6.70 to 6.98 of the main SA Report [CD1/2], and the detailed appraisal matrices in Appendix 7 of the SA Report Appendix [CD1/2].
- 1.9 It is not proposed to carry out additional SA work to consider variations to the site allocations set out in Policy LP39 because reasonable alternative sites have already been subject to SA and considered by the Council when deciding which sites to allocate in the Local Plan that is currently at examination [CD0/1].

Low growth alternative

- 1.10 The lowest of the three growth alternatives prescribed by the Inspector, being 5,808 dwellings over the plan period, represents the amount of growth required to meet North Warwickshire's needs, and to help meet the needs of Tamworth Borough and Coventry and Warwickshire. This growth alternative would not meet any of Birmingham's housing needs, and represents nearly a 40% reduction in the total amount of housing to be delivered from that provided for in the Local Plan.
- 1.11 Under this option, sites with capacity for 2,839 dwellings would be required to be allocated (after taking into account housing completions since 2011, sites with planning consent, and an unchanged windfall allowance of 900 dwellings 2018 to 2033) ($5,808 - 3,104 = 2,704$ plus 5% flexibility buffer of 135 = 2,839 dwellings). It would be feasible for a number of the allocations in the Local Plan to be deleted in order to bring the total housing number down to 5,808 dwellings. Only one of the allocations (Site H14) clearly adjoins the Birmingham administrative area and the Langley Sustainable Urban Extension in the Birmingham Local Plan.
- 1.12 Given that the Spatial Strategy in the Local Plan follows the Settlement Hierarchy as set out in Policy LP2, there are numerous combinations of allocations currently in the Local Plan that could be deleted or reduced in scale to deliver the low growth alternative. The SA would therefore appraise the principle of deleting allocations and comment in broad terms on how different combinations of site allocations sufficient to meet the low growth alternative might perform differently against the SA objectives. For example, it may be possible to have an option that would retain those allocations that perform most favourably against the SA objectives, but these tend to be the smaller sites and would not deliver the number of homes required even under the low growth alternative. Conversely, the lower growth alternative could potentially be achieved by deleting two or more of the larger allocations, although this would not accord with the settlement hierarchy. These and similar issues would be explored through the additional SA work.

Middle growth alternative

- 1.13 The middle alternative prescribed by the Inspector would be the delivery of 7,963 dwellings on the basis of accommodating approximately 2,155 dwellings for Birmingham based on 2011

Census data related to the functional commuting relationship between the two areas. It would represent a 17% reduction in the total amount of housing to be delivered from that provided for in the Local Plan.

- 1.14 Under this option, sites with capacity for 5,102 dwellings would be required to be allocated (after taking into account housing completions since 2011, sites with planning consent, and an unchanged windfall allowance of 900 dwellings 2018 to 2033) ($7,963 - 3,104 = 4,859$ plus 5% flexibility buffer of 243 = 5,102 dwellings).
- 1.15 As with the low growth alternative, it might also be possible to achieve the lower figure by deleting a number of allocations currently included in the Local Plan. An alternative realistic and reasonable approach would be to plan for a lower rate of housing delivery whilst keeping all the allocations currently in the Local Plan. This would still represent a step-change above the completion rates experienced over recent years, but not as high as anticipated in the Local Plan. Housing completion rates over the last five years have averaged 232 dwellings per annum (dpa)¹ compared to an average over the whole plan period of 362 dpa under this alternative (7,963 dwellings/22 years). To achieve an average of 362 dpa would require higher rates of completion in the remaining years of the plan period, because of lower completion rates in the plan period to date..
- 1.16 Therefore, it is proposed that this middle growth alternative would be subject to SA assuming two different scenarios:
1. The deletion in principle of some of the allocations in the Local Plan, but not identifying the specific allocations that would be deleted. However, the SA would comment in broad terms on how different combinations of site allocations sufficient to meet the middle growth alternative might perform against the SA objectives, similar to the approach to be applied to the low growth alternative.
 2. The retention of all the allocations, but assuming a slower build out rate than currently assumed in the Local Plan, but significantly higher than has been the case in recent years. Under this scenario, the capacity of the sites would remain the same, but the assumption for how many homes would be built during the Local Plan period at each site would be 25% lower than the capacity figures suggest (i.e. $(6,821 - 5,102)/6,821 \times 100\%$). In practice some sites may be built out in their entirety within the Local Plan period whilst others may lag further behind. This scenario allows greater flexibility for sites to come forward.

SA analysis and evaluation

- 1.17 As described above, the same SA objectives would be used as have been used in the SA work on the Local Plan to date. The SA would be prepared in the form of a commentary that explores the pros and cons against each SA objective of each of the alternatives described above.

New evidence

- 1.18 In carrying out the additional SA work, reference would be made, where appropriate to any updated evidence gathered since the publication of the SA Report published in December 2017, such as information provided to address the concerns of the Environment Agency and Historic England [SLP302, SLP341] and the Council's Settlement Sustainability Assessment ('SSA')[CD6/3B], which has been updated to reflect present circumstances, should also be made available as supporting evidence.

Presentations of findings

- 1.19 The analysis described above would be used to draw conclusions on the comparative performance of the three growth alternatives prescribed by the Inspector in combination with the rest of the preferred policies in the Local Plan, and in combination with other relevant Plans and Programmes, most notably neighbouring adopted Local Plans.

¹ Calculated for years 2013/14 to 2017/18 from rows under (c) in the table on page 9 of 'North Warwickshire's Five Year Housing Land Supply As at 31 March 2018 [CD8/13B]

Timelines

- 1.20 The additional SA work would be carried out in the latter half of January and in February, with the intention of delivering the outcomes by the end of February 2019.

LUC
14th January 2019