



North Warwickshire  
Borough Council

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Mr T Bristow  
Local Plan Inspector

Sent via email to Programme Officer

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: Dorothy Barratt  
Direct Dial : (01827) |  
Your ref : |  
Our ref : |

Date : 22 July 2020

Dear Mr Bristow,

### Reply to INSP20

Thank you for your letter INSP20 which we received on 22 June 2020 and the points of clarification you have provided on procedural matters. Pleased be assured that we will work with you as quickly as we can to ensure the continued progress of the Local Plan towards adoption.

I set out below our response to your letter in the order that you raised them.

#### ***Housing Requirements (paras 3 to 7)***

I confirm the Plan is seeking to deliver 9598 as its housing requirement and all the information in this reply seeks to deliver that amount of housing. The 12% shortfall identified in paragraph 6 of your letter is technically correct but is based on a potential housing requirement of 7963 and not the figure of 9598. I apologise if we have caused any confusion.

I would like to confirm the situation with the 5% flexibility factor. This is **not** added to the housing requirement making it 9598 plus 5% as flexibility is built into the supply side. I therefore will refer to it again in the section below dealing with housing delivery.

The Borough Council has been working on two stepped trajectories. These are shown in Table 1 below. They reflect the delivery of the A5 improvements between 2024 and 2026. The first stepped trajectory refers to the original delivery date of 2024 and then the second refers to the emerging 25/26 timeline for the delivery of the A5 improvements.

Option 1 stepped trajectory retains the initial 203 figures in the early Plan period 2011/12 to 2018/19 with two step changes, rising to 300 between 2019/20 and 2023/24 and then 719 from 2024/25 to 2032/33 when the initial significant works on the A5 being completed. This provides for 9595 dwellings.

Option 2 stepped trajectory refers to a slightly later delivery of the A5. It retains the initial 203 rate in the early Plan period 2011/12 to 2018/19 with three step changes, rising to 265 between 2018/19 and 2023/24, then 390 in 2024/25 raising to 775 in 2025/26 when the initial significant works on the A5 being either completed or well under construction until 2032/33. This provides for 9601 dwellings.

**Table1 – Stepped Trajectories**

Year	Option 1: Delivery of A5 by 2024		Option 2: Delivery of A5 – 2025/26	
2011/12	203		203	
2012/13	203		203	
2013/14	203		203	
2014/15	203		203	
2015/16	203		203	
2016/17	203		203	
2017/18	203		203	
2018/19	203		265	Step 1
2019/20	300	Step 1	265	
2020/21	300		265	
2021/22	300		265	
2022/23	300		265	
2023/24	300		265	
2024/25	719	Step 2: Phases 1 and 2 A5 completed	390	Step 2
2025/26	719		775	Step 3: Phases 1 and 2 A5 completed
2026/27	719		775	
2027/28	719		775	
2028/29	719		775	
2029/30	719		775	
2030/31	719		775	
2031/32	719		775	
2032/33	719		775	
<b>TOTAL</b>	<b>9595</b>		<b>9601</b>	

**Affordable Housing (paras 8 to 11)**

As you know Adams Integra prepared the viability report for the Local Plan. They have been commissioned to look at the potential of providing 47% affordable housing. I am expecting their report by the end of this week. I will forward the report when we receive it. This document would be part of the consultation proposed below.

**Infrastructure (paras 12 to 14)**

I have simplified the infrastructure table to clearly show which elements of the infrastructure requirements are key to the delivery of the overall strategy within the Local Plan. This is attached as Appendix A to this letter and clearly shows the critical piece of infrastructure for the overall strategy is the improvements to the A5. All other pieces of infrastructure are important to ensure places are sustainable and that development can take place in a positive manner, but it is the A5 which is central to delivering the overall strategy of the plan.

The delivery of the A5 is critical because as stated in AD47 (*A5 Dualling Summary Note*) there is a limit of 800 dwellings which can be completed within the A5 corridor without substantial improvements to the strategic road. As you will recall the reason for the delay between your letter of October 2019 and our reply of February 2020 was due to awaiting the outcome of the HIF bid. This bid was for the completion of Phases 1 and 2 of the improvements to the A5. The funding of this scheme now lies with MHCLG who have committed funds of £79.5m to ensure that improvements as outlined in the HIF bid are carried out with further improvements to the A5 being part of RIS3. This is great news and indicates the Government's commitment to ensuring that the A5 is improved and to ensure the delivery of housing along the corridor.

We are working with Homes England, Highways England, Warwickshire County Council, Department of Transport and MHCLG on detailed project delivery timeline. It will be between 2024 and 2026. We are looking to agree a position statement / statement of common ground to show the commitment to the delivery of the A5 improvements, this will then inform the actual stepped trajectory to be applied to the Plan.

## **Housing Delivery (paras 15 and 16)**

I turn firstly to the issue of flexibility within the Plan. Within the Draft Local Plan Table 7 shows how the number of dwellings to be allocated has been arrived at. This includes figures for net housing completions, those with planning permission, and a windfall allowance. These figures (having already been provided or granted permission) are subtracted from the overall housing requirement (9598 rounded up to 9600), which constitute the remaining requirement to be delivered through specific site allocations in the Plan. This figure amounted to 6496 units to which a further 5% flexibility rate was applied, amounting to an additional 325 units, resulting in a total of 6820 units to be found through site allocations when the Local Plan was first submitted.

I now turn to the issue of lapse rates and the 3% rate proposed by the Council. I refer to the information provided previously in NWBC25, noting an actual average of 2.82% lapse rate over the Plan period from 2011/12 to 2018/19. This figure has been rounded up giving an average of 3% per annum which provides further flexibility to the Plan.

The 5% flexibility rate applied to site allocations with the 3% lapse rate for planning consents is considered to provide flexibility to the Plan. In addition, the conservative approach taken on densities of 30 dwellings per hectare for most allocations (specific exceptions are noted such as Proposal H20 that are greater), applied with a 60% net developable area, with a minimum housing figure, provides further flexibility to the Plan and further potential for increasing delivery numbers and rates. This is particularly pertinent as the Borough Council noted in the Matters Paper PS.M9.01 in paragraph 9.5.4, that many sites “*are coming forward for development have a net density of around 34 dwellings per hectare*”.

In terms of housing delivery, the attached combines the information on the critical infrastructure timings with that of the housing stepped trajectory. There are therefore two sets of information relating to option 1 and option 2 stepped trajectories. Each clearly provides for more than the housing requirement of 9598. They reflect the following:

1. information supplied by landowners/ agents and developers for the sites (*please note however that due to the pandemic and furlough that not every site has recently been updated*);
- 2 each option is the same in terms of completions, windfalls and planning permissions;
- 3 the projected delivery of the allocations is different in each option; and,
- 4 are based on the 2018/19 housing monitoring year information (includes some updates and corrections following the recent Wood End Appeal)

Attached as Appendix C is an excel workbook which includes the following:

- 1 Trajectory summary for Option 1
- 2 Chart for Option 1 – also attached as Appendix B
- 3 Trajectory summary for Option 2
- 4 Chart for Option 2 – also attached as Appendix B
- 5 Complete list of all sources of information for trajectory
- 6 Planning permissions (extracted from sheet 5)
- 7 Allocations trajectory for Option1
- 8 Allocations trajectory for Option 2

The housing supply table (Appendix C excel worksheet) indicates this figure is being addressed through the allocations, achieving a final housing figure of 9851, which includes a 3% lapse rate and a 5% flexibility factor in the allocations supply. An additional reduction of 294 units is also accounted for, to be delivered beyond the plan period following revised trajectory and delivery information provided by the site agents and landowners for some of the allocations, as noted above. The revised trajectory indicates that, notwithstanding the current circumstances and the potential delivery of an element beyond the plan period the Plan can address and deliver the housing requirement comfortably.

The tables for the housing allocations include an assessment of the numbers of expected developers/retail outlets operating from or within those sites. This assessment maintains an expected level of no more than 50 dwellings per annum (dpa) for each outlet, and less in most

cases. It is supported by comments provided by the landowners and/or developers in many cases as to the reliability of this rate and our own assessments, including examining the number of outlets currently operating from large allocated sites in adjoining Borough (Nuneaton and Bedworth). The potential start dates for the strategic site proposals are also particularly related to the required A5 improvements programmed/proposed to commence around 2024/25 in the Trajectories and this critical period of time is highlighted in the Summary Tables for the two Trajectory Options in the attached excel spreadsheet.

For clarity, the highest number of outlets identified for the largest strategic sites H2 and H7, is 4 and 5, the two sites delivering approximately 1300 units and 2000 units respectively over the Plan period. This equates to a delivery rate of less than 50 dpa for Site H2, with a maximum 170 delivery rate for years 29/30 & 30/31 (approximately 43 dpa per outlet) and a maximum of 200 dpa for Site H7 where 5 potential outlets equates to a maximum of 40 dpa per outlet over the Plan period, around 20% less than the national average. Most of the other site proposals indicate only one or at most two expected outlets on the site delivery over the Plan period, with a maximum delivery rate of 50 dpa only applying to two sites, all others applying significantly less from a range of between 12 dpa to 44 dpa, which should provide you with some re-assurance/comfort to that the trajectory is not “over egging” the pudding in terms of delivery rates expected, when compared to national averages.

The justification for numbers of retail outlets is also partly based on knowledge from the landowner/developer of current involvement in (existing presence and planning consent achieved by a specific developer), or interest by, developers in the site proposals and also the number of expected access points to sites providing an operational point for one or two outlets to operate. For all sites over 50 dwellings in size there is a lead in period of between 12 to 18 months from planning consent to construction starting on site, before the maximum expected numbers of outlets are expected to be operating/delivering from the site proposals.

The Trajectory Chart indicating the step change proposed by the Plan and Worksheets contains the supply evidence from the Planning Consent sites and Allocations, including their expected/proposed trajectory, numbers of outlets and delivery rate for sites/allocations over the Plan period to address the 9598 housing requirement. This information also includes updated trajectories and delivery information from the agents and landowners of the allocations, wherever possible. This includes a revised trajectory for Site H7, the Plan’s largest allocation, which has also addressed recent circumstances and some potential minor delivery on the site beyond the plan period).

### ***Allocations (paras 17 and 18)***

Noted.

### ***Currency of Evidence (para 19)***

I understand this issue of the currency of evidence and therefore my team and I will work to progress the Local Plan as quickly as possible. As you are aware the NPPF requires a review of the Local Plan five years after adoption as well as there being a commitment within the Local Plan itself to a review, if required.

In relation to the update of the GTAA we have now received the final version of this technical report. It is called the *Lichfield District Council, North Warwickshire Borough Council and Tamworth Borough Council Gypsy and Traveller Accommodation Assessment (GTAA) Final Report November 2019 - incorporating North Warwickshire’s information as of March 2020*. I have assumed that this should be added to the list of documents that will be part of the forthcoming consultation on documents and so have added it to the list below.

## Summary

I have established a stepped housing trajectory which aligns with the overarching requirement of the Plan period with an appropriate degree of flexibility, justified by evidence of lead-in times and delivery rates as well as information from agents and landowners. I have set out a timeline of infrastructure provision in support of (i), which explains how the A5 project will enable development to come forward in line with the stepped housing trajectory and housing requirement. There are two stepped trajectory options dealing with the two scenarios for the timing of delivery of the improvements. Each however clearly show that the full amount of development can be achieved even with a slight change of delivery date from 2024 to 2025/26.

The update of viability evidence in the light of current affordable housing needs and infrastructure, with the aim of meeting as much as possible of objectively assessed needs in line with NPPF2012 paragraph 47 will be forwarded on to you as soon as it arrives.

## Further Progress

I understand the need to give anyone the opportunity to comment on the range of documents which have been issued since the last set of hearings in April 2019. I would like to suggest that the following documents form part of this process (please note some have been crossed out as they have been superseded by up to date information contained or attached in this letter)

- INSP18 Inspectors Letter Regarding Future Examinations Progress Following Hearings
- NWBC24 NWBC Response to INSP18
- ~~NWBC24A (also NWBC20D) List of potential Main Modifications~~ *(NWBC24A and NWBC20D superseded by the latest information in this letter - see NWBC20E for latest draft potential main modifications)*
- NWBC24B Annex B – NWBC response to INSP18 Affordable Housing Report
- NWBC24B Annex C – NWBC response to INSP18 Justification of Allocation of Sites with regards to the Historic Environment Assessment and Sustainability Appraisal
- NWBC24B Annex D – NWBC response to INSP18 Sequential Test Report
- NWBC24B Annex E – Environment Agency Response to Sequential Test Report
- ~~NWBC24B Annex F – NWBC response to INSP18 Updated Housing Trajectory~~ *(superseded by the latest information in this letter)*
- ~~NWBC24B Annex G – NWBC response to INSP18 Housing Trajectory Graph~~ *(superseded by the latest information in this letter)*
- NWBC24B Annex H – NWBC response to INSP18 5 Year Housing Report
- NWBC24B Annex I – NWBC response to INSP18 Lead in Times and Delivery of Housing Sites over 10 Dwellings and above
- NWBC24B Annex J – NWBC response to INSP18 List of Policies (Strategic or Local)
- NWBC24B Annex K – NWBC response to INSP18 Green Space Assessment
- NWBC24B Annex L – NWBC response to INSP18 Green Space Assessment Maps
- INSP19 Inspectors Note regarding NWBC24
- NWBC25 NWBC Response to INSP19
- INSP20 Inspectors Letter
- NWBC26 NWBC Response to INSP20 (this letter + any additional documents)
- NWBC20E – List of potential Main Modifications (updated July 2020 and includes monitoring indicators)
- AD51a - Draft North Warwickshire Site Specific Flood Risk Technical Note (March 2019 from AECOM)
- AD51b - Site Specific Flood Risk Technical Note (Environment Agency Response, including recommendations for amended Policy text to address their concerns)
- AD54 Environment Agency Site Issues and Maps. This includes proposed Map amendments to H1, H2, H14 addressing EA concerns and following AECOMs work above, splitting site into flood compatible and non-compatible development type areas. Also, potential revised capacity for sites based on 34 dph as well as 30 dph.
- Further viability report on the provision of affordable housing

- Lichfield District Council, North Warwickshire Borough Council and Tamworth Borough Council Gypsy and Traveller Accommodation Assessment (GTAA) Final Report November 2019 (incorporating North Warwickshire's information as of March 2020)

It is not proposed that the following documents will form part of the process for comment as they have been superseded by information in this letter or its appendices:

- NWBC24A (also NWBC20D) List of potential Main Modifications (*NWBC24A and NWBC20D superseded by the latest information in this letter - see NWBC20E for latest draft potential main modifications*)
- NWBC24B Annex F – NWBC response to INSP18 Updated Housing Trajectory (*superseded by the latest information in this letter*)
- NWBC24B Annex G – NWBC response to INSP18 Housing Trajectory Graph (*superseded by the latest information in this letter*)

## **Additional Matters**

### ***Monitoring***

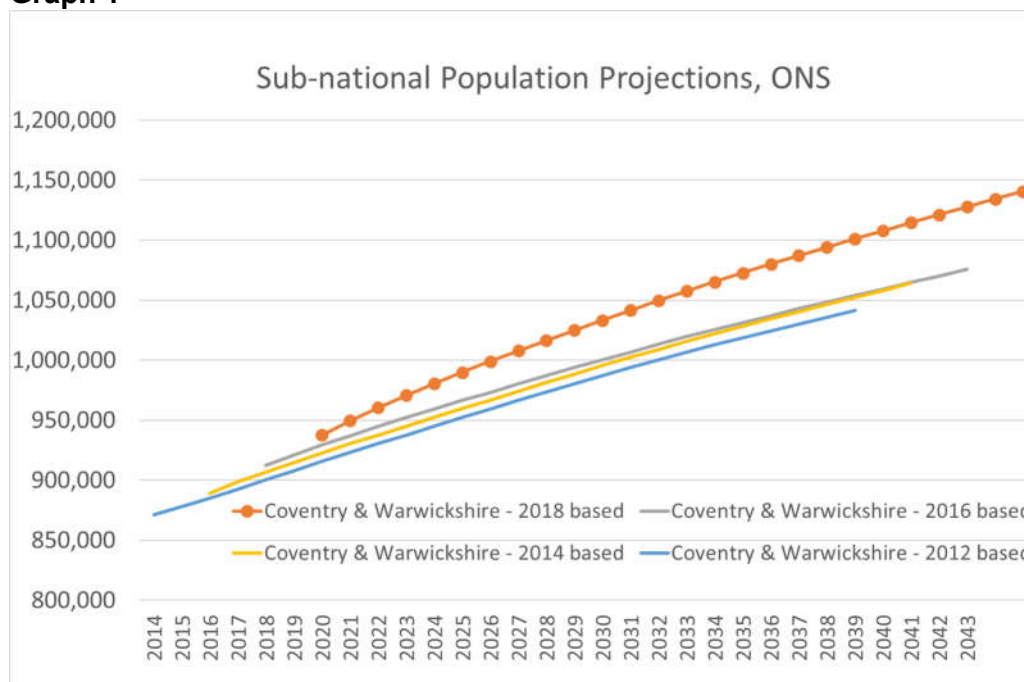
In relation to monitoring indicators these have now been included to the latest schedule of potential Main Modifications.

### ***Revised Household Projections 2018***

As you are aware the Office for National Statistics has published 2018-based Household Projections. The Plan is being examined against the National Planning Policy Framework 2012 under the transitional arrangements. The relevant Planning Practice Guidance (PPG) Housing and economic development needs assessment includes that: "Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued". (Paragraph: 016 Reference ID: 2a-016-20150227).

The Graph 1 below compares the 2018 projections to the 2012, 2014 and 2016 based projections. The 2014 projections were the basis of the SHMA update and sub-regional Local Plans. Population projections themselves are not the final determinant as household formation rates will also inevitably have an effect (as they did with the 2014 based data). This does start to show a possible upturn in growth projections as a sub region although many have expected it to drop off. It is important to be mindful that this is a projection of what will happen if recent trends continue and not a prediction / forecast. It is difficult to know therefore whether this is a long-term change which is meaningful. The 2018 projections are clearly a change, but they are totally out of line from the previous three projections. It is unclear therefore at the moment if it is meaningful change or a blip with it returning to the previous growth curves. This is something that will need to be monitored and discussed with neighbouring local authorities and taken forward in a review of the Local Plan. In addition, for North Warwickshire, which is promoting substantial growth, how it could supply and deliver more housing is uncertain.

**Graph 1**



**Mapping**

The AECOM Report (AD51A) did address this issue and the EA’s response (AD51B) appears to accept and “broadly” agree with its findings and recommendations of that report. They maintain some concerns over sites flexibility’s and capacities but direct these towards ourselves and the Inspector, which I consider we have addressed through [AD54 EA Site Issues and Maps](#) as well as the overall Plan flexibility in terms of the numbers we expect to be delivered over the Plan period. These recommendations (from AD51B) are the basis for the potential Main Modifications to the Plan and Policies to address and take into account post 2016 Climate Change allowances.

**Next Steps**

If any comments come through to the Borough Council, we will forward them on to Kerry, the Programme Officer as quickly as possible.

As part of the consultation process publicising the documents identified above I would like to give an indication of when, if they are required, any further hearings could take place. Week commencing 19<sup>th</sup> October 2020 may give sufficient time between the close of the period for comment.

If you are agreeable, I would suggest the following timeline:

Documents available for comment	Thursday 6 <sup>th</sup> August 2020 to Wednesday 16 <sup>th</sup> September 6 weeks
Possible Hearing sessions	w/c 19 <sup>th</sup> October 2020
Main Modifications including updated SA	November / December 2020
Inspector’s report	Early 2021
Adoption	Early 2021

I will send the viability report as soon as possible.

I look forward to confirmation of the consultation and the suggested timeline. Please let me know if you have any queries.

Yours sincerely

*D M Barratt*

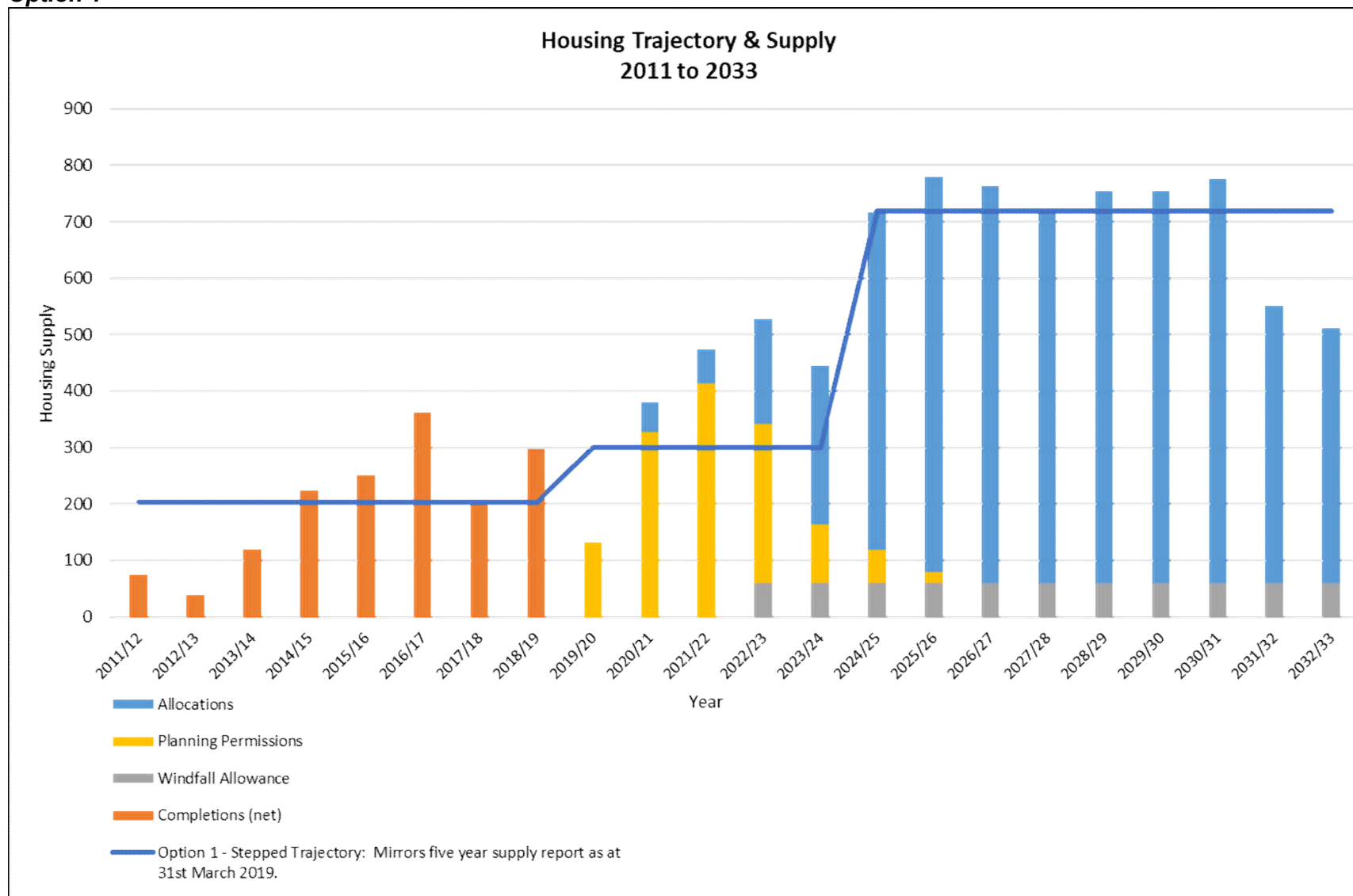
Dorothy M Barratt  
Forward Planning & Economic Development Manager



## Infrastructure Table

	INFRASTRUCTURE TYPE	LOCATION	LEAD DELIVERY	SOURCE OF FUNDING	COST	Planning Strategy <i>Importance to Strategy</i>	<i>Reason</i>
<b>TRANSPORT</b>							
1	Traffic Modelling will be needed to assess all sites	Borough Wide	Highways England WCC	Highways England (not committed), Developer contributions		Important	Site specific implications to be considered
2	Improvements to A5	Dordon / Grendon	Highways England WCC	MCLHG	79M	CRITICAL	To facilitate development
3	Improvements to Island at Holly Lane (Atherstone)	Atherstone	Highways England WCC	MCLHG	part of above project	CRITICAL	To facilitate development
4	Improvements to Holly Lane Bridge	Atherstone	Highways England, WCC,	Developer Contributions	TBC	Important	To facilitate development
5	Creation of through road in Dordon/Polesworth as development takes place (first part of road already started)	Dordon/Polesworth	NWBC WCC	Developer		Important	To facilitate development
6	Creation of through road at Church Road-Nuneaton/Camp Hill Rd allocated site	Hartshill	NWBC, Highways England (advisory)	Developer	TBC	Important	To facilitate development
7	Improved services including provision of a footbridge and parking facilities at Polesworth Railway Station	Polesworth	Network Rail	Developer contributions	TBC	Important	To facilitate development
8	Improved car parking at Atherstone Railway Station	Atherstone	Network Rail	Developer contributions	TBC	Important	To facilitate development
9	Improved facilities at station – footbridge, ticket office	Atherstone	Network Rail	WCC, Network Rail, Rail Operators	At least £1.5m	Important	To facilitate development
10	Improvements to bus services	Borough wide	WCC, Voluntary Sector	Developer contributions, WCC	TBC	Important	To make development sustainable
11	Arley Station	Arley		WCC, Network Rail,	£8M	Important	To make development sustainable
12	Kingsbury Station	Kingsbury	NWBC owns part of site	WCC, Network Rail,	£8M	Important	To make development sustainable
13	Walking and Cycling	Borough Wide	NWBC, WCC	Developer contributions	TBC	Important	To make development sustainable
<b>GREEN INFRASTRUCTURE</b>							
14	Canal Towpath improvements	Borough wide	British Waterways NWBC	Developer contributions	TBC	Important	To make development sustainable
15	Improved green linkages Borough wide	Borough wide	NWBC	Developer contributions	TBC	Important	To make development sustainable
16	Delivery of Play Area Development Programme	Borough wide	NWBC	Developer contributions, NWBC, Grant Aid	£950K	Important	To make development sustainable
17	Delivery of a hub containing retail, community and health facilities	Dordon/Polesworth	NWBC	Developer contributions	TBC	Important	To make development sustainable
18	Delivery of Allotments Development Programme	Borough wide	NWBC	Developer contributions, NWBC, Grant Aid	£20K	Important	To make development sustainable
19	TVWLPS	Tame Valley	WWT plus 18 partner organisations including NWBC	NWBC, Developer Contributions, Environment Agency External Grants (including the Heritage Lottery Fund for the TVWLPS).	£2.5 million (£1.7 million from the Heritage Lottery Fund).	Important	To make development sustainable
<b>HOUSING</b>							
20	Affordable Housing	Borough wide	NWBC Housing Association Preferred Partners	Developer contributions (land at nil cost or off-site financial contributions) Housing Associations (private finance) HCA ( Social Housing Grant) CSW Sub-region - various enabling grants)	TBC	Important	To cater for the needs of the Borough
21	Requirement of 9 residential and 5 transit gypsy and traveller pitches	Borough wide	NWBC, WCC, Private	Developer, Government Grant, WCC		Important	To cater for the needs of the Borough
22	Requirement of 1 pitch for travelling showpeople to be allocated within Warwickshire Districts	Within Warwickshire	CSW Local Authorities, Private, WCC	Developer Contributions, Government Grant, WCC	TBC	Important	To cater for the needs of the Borough
23	Extra Care Accommodation	Borough Wide	WCC, RSLs/SDC	WCC, Developer Contributions	TBC	Important	To cater for the needs of the Borough
24	Housing for Vulnerable Adults	Borough Wide	WCC	WCC, Developer Contributions	TBC	Important	To cater for the needs of the Borough
<b>EDUCATION</b>							
25	New Primary Schools	Atherstone, 2 x Polesworth/Dordon	WCC	WCC, Developer Contributions	TBC	Important	To make development sustainable
26	Additional school places	Borough Wide	WCC	WCC, Developer Contributions	£21.2M	Important	Shortfall of places identified
27	Hartshill School	Hartshill	WCC	WCC, Developer Contributions	TBC	Important	Shortfall of places identified
<b>HEALTH</b>							
28	Additional health care facilities to include additional clinical rooms	Borough wide	CCG, NHS England	Developer contributions, NHS England	Cost determined by application	Important	To make development sustainable
<b>SOCIAL INFRASTRUCTURE</b>							
29	Community Venue (upgrade or new facility)	Borough Wide	NWBC	Developer contributions	Will vary on scale and detail	Important	To make development sustainable
30	Replacement/refurbishment of other Leisure Facilities	Atherstone, Kingsbury and Polesworth	NWBC	NWBC, Developer contributions, grant aid	£4.9M	Important	Pressure on services identified
<b>PUBLIC SERVICES</b>							
31	Fire Station Upgrades	Borough Wide	WCC	WCC, Developer contributions	£121 (per new dwelling)	Important	Pressure on services identified
32	Waste Management	Borough Wide	WCC	WCC, Developer contributions	£43.92 (per new dwelling)	Important	Pressure on services identified
<b>UTILITY SERVICES</b>							
33	Hydraulic Modelling will be needed at some sites	Borough Wide	Severn Trent Water	Severn Trent,	Varying	Important	To make development sustainable
34	Additional capacity will/may be required to accommodate future expansion	Atherstone and Mancetter, Hartshill, Shustoke and West Dordon	Severn Trent Water	Severn Trent,	Varying	Important	To make development sustainable
35	Broadband	All locations	NWBC, WCC, Telecoms Infrastructure Companies	Developers	VARIOUS	Important	To make development connected and future proofed

Option 1



**Option 2**

