



North Warwickshire
Borough Council

North Warwickshire Borough Council

North Warwickshire Strategic Housing Land Availability Assessment 2016



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Executive Summary

Introduction

Peter Brett Associates LLP was commissioned in November 2015 by North Warwickshire Borough Council to undertake a review of its Strategic Housing Land Availability Assessment ('SHLAA'). The Council is currently preparing a new Local Plan, and requires an update and review of the SHLAA to ensure that there is sufficient land for new housing in the borough to cover the plan period to 2031.

The SHLAA covers the entire area within the administrative boundary of North Warwickshire, and has been undertaken in full compliance with the National Planning Policy Framework of March 2012 and the Planning Practice Guidance of March 2014, in particular the section on the assessment of land availability. The SHLAA has also been undertaken in accordance with the Coventry and Warwickshire SHLAA Joint Method Statement ('JMS') of May 2015.

Approach

The Council initially identified 254 sites for consideration in the SHLAA, which included new sites that were not considered in the previous (2013) SHLAA comprising sites put forward through a fresh 'call for sites' exercise and other sites identified by officers via a desk based study. The SHLAA base date is 1 April 2016, in line with the latest available housing data from the Council.

The council undertook an initial sitting exercise in accordance with the JMS, which resulted in 138 of the 254 sites being identified for assessment as part of this SHLAA. We recorded site characteristics and various other information for each of the 138 sites through a combination of desk-based research and site visits. In order to assess the number of dwellings that could theoretically be provided at each site, we took account of permanent features and appropriate gross to net ratios. Having identified the net developable area of each site, we then applied a density of 30 dwellings per hectare to all sites, except those sites in town centres where a density of 50 dwellings per hectare was applied, based on guidance set out within the JMS.

Using the information described above we subjected all of the 138 sites to a comprehensive assessment against various 'suitability', 'availability' and 'achievability' criteria and each site was placed into one of three 'Category' bands: Green ('deliverable'), Amber ('developable') or Red ('not currently developable').

Findings

The headline findings from the SHLAA are as follows:

- The 138 assessed sites could theoretically accommodate around 26,432 dwellings, if they were all to come forward.
- Of the theoretical 26,432 unit capacity, 2,241 units are on 30 sites assessed as being 'deliverable' (i.e. Green Category), with a further 13,046 units on 71 'developable' sites (Amber Category) and 11,145 units are on 37 sites which are not currently developable (Red Category) but which could potentially come forward at some point in the future.
- Of the theoretical 26,432 unit capacity, previously developed sites could yield 4,069 dwellings, of which 94 units could come forward in the first five-year period (Green Category), a further 806 units have been identified on 'developable' PDL sites (Amber Category) and 3,169 units are not currently developable (Red Category).
- Of the theoretical 26,432 unit capacity, greenfield sites could yield 14,071 dwellings, of which 1,058 units could come forward in the first five year period (Green Category), a further 7,765 units have been identified on 'developable' greenfield sites (Amber Category) and the remaining 5,248 units are not currently developable (Red Category).

- Of the theoretical 26,432 unit capacity, Green Belt sites could provide 8,292 dwellings, of which 1,089 units could come forward in the first five-year period (Green Category), a further 4,475 units have been identified on 'developable' Green Belt sites (Amber Category) and the remaining 2,728 units from Green Belt sites are not currently developable (Red Category).

We assessed the adequacy of this theoretical capacity against the identified five-year, 10-year and 15-year minimum Coventry and Warwickshire 'Memorandum of Understanding' target of 5,280 net additional dwellings, and also against the maximum target of 9,070 net additional dwellings which allows for meeting some of Greater Birmingham's housing needs. In undertaking the exercise we also made an allowance for non-implementation and non-delivery of outstanding commitments/allocations.

The findings from the process described above indicate that outstanding permissions and allocations are insufficient to meet the five-year housing requirement. However, the 138 SHLAA sites which we assessed in the study, when considered together with outstanding planning commitments and allocations, are theoretically capable of providing sufficient dwellings to meet the five-year, 10-year and 15-year dwelling requirements based on the minimum 'Memorandum of Understanding' dwelling target and the maximum target under the scenario whereby North Warwickshire will also help to meet some of Greater Birmingham's housing needs.

It is important to emphasise that 41 of the 138 SHLAA sites which have been assessed are fully or partially within the Green Belt. Within the plan period, the potential dwelling yield from sites within the Green Belt (of 5,934 units) amounts to 34 per cent of the overall theoretical yield of 17,294 units. If the theoretical supply from units within the Green Belt is removed from the assessment, 11,360 units could be delivered from land which is currently not within the Green Belt, within the plan period.

Given that the maximum 15-year dwelling requirement for North Warwickshire is 8,374 dwellings, this finding would suggest that the release of Green Belt land is not required in order for the Borough to meet its housing requirements up to 2031. However, our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation, which are likely to include the broad sustainability of the total development pattern, impact on biodiversity and landscape, and strategic transport and other infrastructure capacity issues. We have not undertaken any analysis to consider whether the theoretical supply from the sites we have assessed is in the right place to meet strategic policy objectives. If not then it could well be necessary to release some Green Belt land in order to achieve the targets in full. These issues are beyond the scope of a SHLAA and will need to be considered through the plan preparation process.

1 Introduction

1.1 Purpose of the Study

- 1.1.1 In November 2015, Peter Brett Associates LLP ('PBA') was commissioned by North Warwickshire Borough Council ('NWBC') to undertake a review of its Strategic Housing Land Availability Assessment ('SHLAA'). The previous SHLAA study was produced by PBA in December 2013, which was an update of the original SHLAA undertaken by Baker Associates in February 2010. Baker Associates is now part of PBA following a merger of the two companies, together with Roger Tym & Partners, in April 2011.
- 1.1.2 The Council is currently preparing a Site Allocations Plan, which will form part of the Local Plan for North Warwickshire and identify sites required to meet the strategic objectives set out in the Core Strategy (adopted October 2014). NWBC has agreed to sign a Memorandum of Understanding with adjoining local authorities to accommodate a proportion of Coventry City Council's housing needs. Further to this, NWBC has been asked to assess whether the Council is able to assist with addressing housing shortfall arising within the Greater Birmingham Housing Market Area. An update and review of the SHLAA is therefore required to ensure that there is sufficient land for new housing in the borough to accommodate a minimum of 5,280 net additional dwellings and up to 9,070 net additional dwellings. In order to accommodate this additional housing growth, the SHLAA provides an assessment of the suitability, availability and achievability sites that have been submitted to the Council through a 'call for sites' exercise, as well as other sites identified by officers via a desk based study.
- 1.1.3 The SHLAA, which covers the entire area within the administrative boundary of North Warwickshire, has been undertaken in full compliance with the National Planning Policy Framework ('NPPF') of March 2012 and the Planning Practice Guidance ('PPG') of March 2014, in particular the section on the assessment of land availability. The SHLAA has also been undertaken in accordance with the Coventry and Warwickshire SHLAA Joint Method Statement (May 2015).
- 1.1.4 In accordance with the guidance, we have assessed whether each identified site is 'deliverable' (i.e. available now, suitable and achievable), 'developable', or 'not currently developable'¹.
- 1.1.5 At the outset it is important to emphasise that the SHLAA is a technical study which forms part of the LDF evidence base, together with a range of other technical studies. It therefore does not represent a statement of Council policy and it does not have any bearing on the determination of planning applications. It should also be emphasised that the purpose of the SHLAA is not to allocate sites, which will be done through the Site Allocations Plan.

1.2 Structure of Our Report

- 1.2.1 The remainder of this SHLAA report is structured as follows:
- Section 2 contains a review of the national and local planning policy contexts, as well as the requirements of the Coventry and Warwickshire SHLAA Joint Method Statement;
 - Section 3 describes the methodology that we employed for the study; and
 - Section 4 provides the results from the study and assesses whether the dwelling targets for North Warwickshire can be achieved.
- 1.2.2 Our overall outputs from the SHLAA are as follows:

¹ Para 47 of the NPPF requires LPAs to identify a supply of 'deliverable' sites for the first five years, and a further supply of 'developable' sites for years 6-10 and, where possible, for years 11-15.

- Volume A – ‘Main Report’;
- Volume B – ‘Appendices to the Main Report’, which includes the table of assessed sites, the site assessment criteria note, our site assessment spreadsheets, and a number of plans identifying the study sites.

2 National and Local Planning Policy

2.1 National Planning Policy and Guidance

Requirement to Undertake a SHLAA

- 2.1.1 Paragraph 159 of the NPPF sets the requirement for LPAs to undertake a SHLAA, the purpose of which is to *'establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period'*.

Achieving Sustainable Development

- 2.1.2 The very first sentence of the NPPF, in the Ministerial Foreword, makes clear that the purpose of planning is to help achieve sustainable development. The Ministerial Foreword then states that *'sustainable development is about positive growth'* and that the planning system is about making this happen.
- 2.1.3 Paragraph 7 of the NPPF states that there are three dimensions to sustainable development: economic, social and environmental. We do not consider it worthwhile repeating in full what the NPPF says in relation to each *'dimension'*, but we note that under the economic dimension, the NPPF states that in order to build a strong, responsive and competitive economy, it is important to ensure that *'sufficient land of the right type is available in the right places and at the right time to support growth and innovation'*.
- 2.1.4 Paragraph 17 of the NPPF sets out 12 core planning principles. Again, we do not repeat those principles here but we note the third principle, which implores the planning system to *'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'*. The NPPF then goes on to emphasise the Government's commitment to securing economic growth.

Delivering a Wide Choice of High Quality Homes

- 2.1.5 Paragraph 47 of the NPPF advises that, in order to significantly boost the supply of housing, LPAs should ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. The same paragraph requires councils to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing, but it goes further than the precursor PPS3 which it replaced, stating that LPAs should provide sufficient land for an additional 5 per cent 'buffer', or a 20 per cent buffer where there has been a persistent record of under-delivery.
- 2.1.6 Paragraph 48 of the NPPF permits the use of a windfall allowance in the five-year supply, if there is *'compelling evidence'* that such sites have made a consistent contribution to the supply and where there is confidence that such sites will continue to provide a reliable source of supply.
- 2.1.7 Paragraph 49 of the NPPF states that *'Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites'*. Paragraph 14 of the NPPF advises that, where the development plan is absent, silent or relevant policies are out-of-date, planning permission should be granted for development proposals unless *'any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed in this Framework taken as a whole'* or where specified policies in the NPPF indicate that development should be restricted.
- 2.1.8 It is therefore imperative that any sites which are included in a council's five-year land supply are genuinely deliverable. Failure to do so could result in a council facing pressure to release sites in an unplanned fashion.

- 2.1.9 We also wish to highlight paragraph 50 of the NPPF, which advocates a mix of high-quality housing that is capable of meeting the needs of different groups in the community. The same paragraph also advises LPAs to ensure an adequate supply of housing in terms of size, type, tenure and range.

Planning Practice Guidance

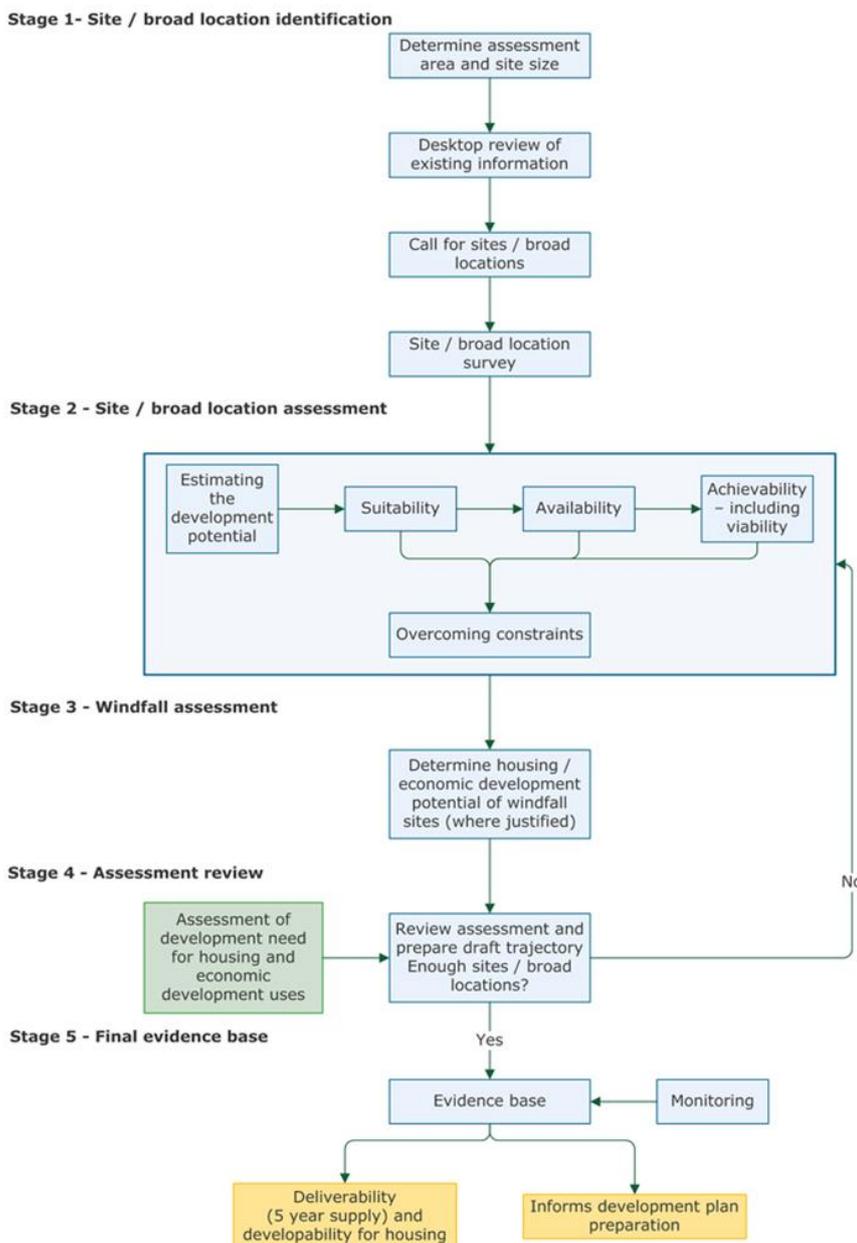
- 2.1.10 On 6 March 2014, CLG launched the online Planning Practice Guidance ('PPG')² to provide additional guidance on a range of topics, including land availability assessments. The PPG identifies the assessment of land availability as an important step in the preparation of Local Plans and states that the purpose of the SHLAA is to:
- identify sites and broad locations with potential for development;
 - assess their development potential; and
 - assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 2.1.11 The PPG explains that the aim of a SHLAA is to identify as many sites with housing potential in and around as many settlements as possible in the study area. As a minimum the SHLAA should aim to identify sufficient specific sites for at least the first 10 years of a plan, from the date of its adoption, and ideally for longer than the whole 15 year period. Where it is not possible to identify sufficient sites, the SHLAA should provide the evidence base to support judgements around whether broad locations should be identified and/or whether there are genuine local circumstances that mean a windfall allowance may be justified in the first 10 years of the plan.
- 2.1.12 The PPG is clear in advising that the SHLAA assessment is an important evidence source to inform plan making, but does not in itself determine whether a site should be allocated for development. The role of the SHLAA is to provide information on the range of sites which are available to meet needs, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.
- 2.1.13 The PPG sets out a five stage flow chart describing a methodology as to how a SHLAA should be undertaken at 'Paragraph: 006 Reference ID: 3-006-20140306' (reproduced below as Figure 2.1).
- 2.1.14 Stage 1 involves identifying the area for the assessment, which should be the housing market area and functional economic market area. The PPG states that this can be the local planning authority area. The SHLAA is required to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate. The assessment is required to consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500 sq.m of floor space) and above.
- 2.1.15 Stage 2 involves an estimation of the development potential of each identified site, which should be guided by the existing or emerging plan policy including locally determined policies on density. The SHLAA should assess the suitability, availability and achievability of sites.
- 2.1.16 Stage 3 states that a windfall allowance may be justified in the five-year supply if a local planning authority has compelling evidence as set out in paragraph 48 of the NPPF. LPAs have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area.
- 2.1.17 Stage 4 requires that once sites and broad locations have been assessed, the development potential of all sites should be collated to produce an indicative trajectory. This should set out

² <http://planningguidance.planningportal.gov.uk/blog/guidance/>

how much housing that can be provided, and at what point in the future. An overall risk assessment should be made as to whether sites will come forward as anticipated.

2.1.18 Stage 5 involves the collation of the final evidence base, which includes an assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable, in order to determine whether a site is realistically expected to be developed and when. Assessing the suitability, availability and achievability will provide the information as to whether a site can be considered deliverable, developable or not currently developable for housing.

Figure 2.1: SHLAA Methodology Flow Chart



Source: Planning Practice Guidance (Paragraph 006, Reference ID: 3-006-20140306)

2.2 Local Policy Context

Adopted Core Strategy (October 2014)

- 2.2.1 The Core Strategy forms a key part of the Local Plan for North Warwickshire. It contains a vision and strategic objectives for the Borough, as well as Core Policies that will set the basis for directing development for the period to 2029.
- 2.2.2 The Spatial Vision for the Borough is to *‘accommodate development in a balanced and sustainable way, placing a high priority on quality of life, ensuring the protection, restoration and enhancement of valuable natural and historic resources and providing the necessary supporting infrastructure’*. The Spatial Vision also states that *‘Housing catering for the needs of residents will be provided in order to give choice of tenure and location and will be located to take advantage of good public transport accessibility and to help maintain and enhance the vitality and viability of settlements’*.
- 2.2.3 The Spatial Vision is underpinned by a number of Strategic Objectives, which include the following:
- To secure a sustainable pattern of development reflecting the rural character of the Borough – this will include giving priority to re-using previously developed land and buildings within Market Towns and Local Service Centres, recognising regeneration opportunities, as well as reducing the overall need to travel, limiting exposure to flood risk and protecting the Borough’s environmental assets and rural character.
 - To provide for the housing needs of the Borough – this will ensure there will be a sufficient supply and appropriate size, mix and tenure of housing to meet the identified requirements of residents.
- 2.2.4 Policy NW1 sets out the settlement hierarchy, as follows:
- Category 1: Market Towns (outside of the Green Belt) – Atherstone with Mancetter, Polesworth with Dordon.
 - Category 2: Green Belt Market Town – Coleshill.
 - Category 3A: Local Service Centres (outside of the Green Belt) – Baddesley & Grendon, Hartshill with Ansley Common.
 - Category 3B: Local Service Centres (within the Green Belt) – New Arley and Old Arley, Kingsbury, Water Orton.
 - Category 4: Other Settlements with a development boundary – Ansley, Austrey, Curdworth, Fillongley, Hurley, Newton Regis, Piccadilly, Shuttington, Shustoke, Warton, Whitacre Heath, Wood End.
 - Category 5: Outside of the above settlements
- 2.2.5 Policy NW3 states that the outer extent of the West Midlands Green Belt in North Warwickshire is shown on the Proposals Map. The supporting text states that Green Belt policy operates over two thirds of the Borough, and that in these locations there is a general presumption against development that is inappropriate, except in very special circumstances.
- 2.2.6 The Core Strategy explains that the *‘maintenance of the Green Belt is seen as a vital component in protecting and enhancing the Borough as an area of pleasant countryside, especially by preventing the incursion of nearby urban areas’*, and that the *‘wholeness of the Green Belt designation is important and further exclusions would reduce its effectiveness’*.
- 2.2.7 Policy NW4 relates to housing development, and confirms that between 2011 and 2029 at least 3,650 net additional dwellings will be developed in North Warwickshire, of which 500 are

to meet needs arising in Tamworth. The policy states that site specific proposals or allocations will be identified in future Development Plan Documents.

2.2.8 Policy NW5 identifies the split of housing numbers between the settlements listed within the settlement hierarchy. Atherstone with Mancetter and Polesworth with Dordon are the settlements where the majority of development will be directed. Coleshill is recognised as a Green Belt Market Town and there are five Local Service Centres located throughout the Borough which provide important local services and facilities. Housing growth will be distributed to the largest settlements, then to the Green Belt Market Town, followed by Local Service Centres outside of the Green Belt, and then to Local Service Centres inside the Green Belt. In the remaining settlements, villages and hamlets, development that provides for local housing needs and helps to support local services will be permitted.

2.2.9 Policy NW5 sets out how the housing requirement will be distributed, as follows (all figures are expressed as minima):

Settlement Category	Settlement Name	Number of Units
1	Atherstone with Mancetter	600
	Polesworth with Dordon	440
2	Coleshill	275
3A	Grendon & Baddesley Ensor	180
	Hartshill with Ansley Common	400
3B	New Arley and Old Arley	90
	Kingsbury	50
	Water Orton	50
4	Ansley	40
	Austrey	40
	Curdworth	15
	Fillongley	30
	Hurley	30
	Newton Regis	15
	Piccadilly	5
	Shuttington	10
	Shustoke	15
	Warton	45
	Whitacre Heath	20
Wood End	30	

Adopted Local Plan (July 2006)

2.2.10 Whilst the Core Strategy has replaced some of the saved policies of the adopted Local Plan 2006, much of the Local Plan 2006 remains part of the statutory development plan for North Warwickshire. The housing strategy in the Local Plan is to '*seek to ensure that everyone in the Borough is housed in reasonable accommodation suitable to their needs*'. To this end, the Local Plan states that the overarching issues for North Warwickshire are:

- the promotion and delivery of affordable housing;
- using previously developed land in sustainable locations wherever possible;
- providing housing in the right locations to suit local needs; and
- restricting housing development in the countryside in order to achieve more sustainable communities.

2.2.11 Core Policy 7 ('Housing Land Requirement') of the Local Plan is not saved, but we consider it worth noting here that a windfall allowance of 60 units per annum was considered appropriate

by the Council when calculating the components of future housing supply. The Council also applied a 10 per cent non-implementation rate to commitments and projected windfalls.

Emerging Site Allocations Plan

- 2.2.12 The Site Allocations Plan ('SAP') will identify sites required to meet the strategic objectives set out in the Core Strategy and will form part of the Local Plan for North Warwickshire. NWBC consulted on the draft Pre-Submission version of the SAP during Summer 2014.
- 2.2.13 The draft Pre-Submission SAP identifies a range of locations which could meet the minimum requirement for 3,650 net additional dwelling up to 2029. The document identified that the number of residential planning permissions still valid/extant or granted between 1 April 2011 and the end of February 2014 across the Borough was 1,096 units and that the number of dwellings deriving from draft allocation sites amounted to 2,240 units. Adding the two figures together gives a total of 3,336 units, leaving a shortfall of 314 units in relation to the minimum Core Strategy housing requirement of 3,650 units. The Council's expectation was that this shortfall will be made up by windfall developments in a number of settlements and by increased delivery on the identified allocated sites. The proposed housing allocations within the Borough's various defined settlements are detailed in a table on pages 28 and 29 of the draft Pre-Submission SAP, which is reproduced below as Figure 2.2 for ease of reference:

Figure 2.2: Proposed Housing Allocations from the draft Pre-Submission Site Allocations Plan

Category	Settlement Name	Planning Consents as at 01/03/2014	Allocated Housing Requirement (Core Strategy)	Allocated Delivery	Potential Delivery Total
Category 1: Market Towns	Atherstone & Mancetter	412	600	519	931 (Additional potential available north of Durmo's subject to addressing floodzone issue)
	Polesworth & Dordon	53	440	617	670 (Additional potential likely at DOR17 and north of Dunns Lane)
Category 2: Green Belt Market Town	Coleshill	186	275	82	268 + 7 Windfall allowance
Category 3A: Local service Centres	Grendon & Baddesley Ensor	36	180	216	252 Inclusion of Grendon Appeal site, Dairy House Farm
	Hartshill with Ansley Common	50	400	440	490
Category 3B: Local service Centres	Old & New Arley	86	90	28	114
	Kingsbury	42	50	15	57
	Water Orton	73	50	9	82
Category 4: Smaller Rural Villages*	Ansley	0	40	57	57
	Austrey	1	40	67	68
	Curdworth	3	15	12	12 + 3 Windfall Allowance
	Fillongley	10	30	11	11 + 19 Windfall allowance
	Hurley	16	30	21	21 + 9 windfall allowance
	Newton Regis	4	15	24	24 - Inclusion of Appeal Site at Seckington Lane
					- 9 units.
	Piccadilly	19	5	3	22
	Shuttington	8	10	6	14
	Shustoke	16	15	0	0
	Warton	3	45	67	67
	Whitacre Heath	29	20	6	35 - 6 allocated
	Wood End	4	30	38	38
Category 5 - Outside of the above settlements	Only affordable housing where there is a proven local need and it is small in scale and does not compromise important environmental assets.				
TOTALS		1096 Borough wide consents		2238 current original allocations	1096+2238=3334 + 316 Windfall Allowance for the Borough to achieve 3650

*The following settlements will cater for the following amount of development on sites of no more than 10 units at any one time unless a Neighbourhood Plan allocates more.

Memorandum of Understanding

- 2.2.14 In the period since the Draft Pre-submission SAP was published, NWBC has signed a Memorandum of Understanding ('MoU') alongside other authorities within Coventry and Warwickshire to ensure that the housing needs of the Coventry and Warwickshire Housing Market Area '(HMA)' are met in full.
- 2.2.15 Coventry City Council is unable to meet its full objectively assessed housing needs within the administrative boundary, and therefore the MoU seeks to ensure that housing needs arising in Coventry will be able to be met within the HMA as a whole. As part of the MoU, NWBC has agreed to deliver a minimum of 5,280 dwellings during the 2011 to 2031 period. The MoU requires each LPA to prepare a Local Plan that reflects the agreed housing distribution.

Contributing Towards Addressing Greater Birmingham's Housing Shortfall

- 2.2.16 In addition to meeting a proportion of Coventry and Warwickshire's unmet housing needs, NWBC has been authorised to test whether the authority has sufficient land to assist with addressing the Greater Birmingham HMA's housing shortfall. This SHLAA update therefore also considers whether NWBC can deliver up to 9,070 net additional dwellings during 2011-2031 to assist in meeting the Greater Birmingham housing shortfall.

Coventry and Warwickshire Joint Method Statement

- 2.2.17 In November 2014 the Coventry and Warwickshire Economic Prosperity Board resolved that a Joint SHLAA Methodology should be agreed by all planning authorities in Coventry and Warwickshire in order to respond to the housing needs of the HMA and meet the obligations under the duty to co-operate.
- 2.2.18 In May 2015, the Coventry and Warwickshire planning authorities, including NWBC, published a Joint Method Statement ('JMS') to provide a consistent methodology for the production of SHLAAs in each authority area. The JMS methodology sets out how of how each authority's SHLAA will respond to each stage of the PPG methodology.
- 2.2.19 The JMS sets out 'indicative density assumptions' for estimating housing potential in North Warwickshire of 30 dwellings per hectare on all sites, except in town centres where the figure is 50 dwellings per hectare.

3 Study Methodology

3.1 Introduction

- 3.1.1 As we explained in Section 2, the PPG provides details on the methodology for undertaking a SHLAA, which has five main stages. These five stages are reflected in the Coventry and Warwickshire JMS.
- 3.1.2 At the outset we wish to emphasise that we are very familiar with the PPG and the approach to SHLAA studies, having undertaken numerous such studies across the country. We have brought this experience to bear in the North Warwickshire SHLAA, which is therefore wholly compliant with the PPG as well as the requirements of the NPPF.

3.2 Stage 1 – Site Identification

Study Area

- 3.2.1 The study area comprises the whole of the administrative area of North Warwickshire. The NPPF and the PPG set a clear expectation that the supply of land for housing should be based upon specific sites and, where necessary, broad locations. Paragraph: 012 Reference ID: 3-012-20140306 of the PPG provides a list of possible sources for identifying potential housing sites. The list includes sites that are already in the planning process as well as sites that are not currently in the planning process.
- 3.2.2 Building on the work undertaken as part of the previous SHLAAs, the Council drew upon the sources identified in the PPG to identify new sites that would form part of the updated SHLAA study, which were not identified at the time of the previous study in 2013. In accordance with the JMS methodology, these new sites included sites identified by officers at NWBC via a desktop review, and a fresh ‘call for sites’ exercise, which took place in Autumn 2015.

Sites to be Excluded at Stage 1

- 3.2.3 The PPG is clear that the SHLAA should identify as many sites as possible and sites should not be excluded from the assessment simply because of current policy designations. Although sites within the Green Belt were not included in the previous SHLAA assessments, the Council now considers that the release of Green Belt land may be required in order to accommodate some of the housing needs of adjoining authorities. We have therefore assessed additional sites within the Green Belt, albeit it is important to note that Green Belt is a nationally important policy designation and paragraph 83 of the NPPF states that its boundaries should only be amended in ‘*exceptional circumstances*’.
- 3.2.4 In accordance with the JMS, sites which meet the following criteria were excluded from the assessment at this initial stage:
- sites capable of accommodating fewer than five dwellings;
 - sites that are entirely within Flood Zone 3;
 - sites that would entirely comprise (or include) garden land, unless submitted as part of the call for sites exercise; or
 - sites currently protected for an existing use, such as employment or open space, unless there is evidence to indicate that the site is surplus to requirements.
- 3.2.5 The Council compiled an initial list of potential housing sites using the sources referred to above (including the new ‘call for sites’ exercise) and the previous SHLAA, and determined which sites should be included in the SHLAA update assessment. The Council excluded sites which meet the criteria specified above, leaving 110 additional sites which we have therefore assessed. When adding these additional sites to the sites which form part of the previous

SHLAA, a total of 138 specific sites have been assessed as part of this SHLAA. A table of all sites which were put forward for assessment as part of this SHLAA is provided at Appendix 3.

The Survey of Identified Sites

3.2.6 We recorded site characteristics and various other information for each of the identified sites through a combination of desk-based research and site visits. In summary, the information collected included:

- site size in hectares and basic identifier information such as site name/address, and sources/references;
- current land uses both at the site and in the surrounding area;
- the surveyor's assessment of what proportion of the site is available for development, taking account of any on-site permanent features;
- details of any obvious physical constraints in relation to site access, drainage, ground conditions, and so on;
- bad neighbour uses, and the surveyor's assessment of the severity of the constraint;
- details of anything that might affect availability or achievability; and
- the surveyor's initial assessment of the site's suitability for housing.

3.2.7 It is important to emphasise that in a strategic study like this, it is not possible to assess physical constraints, availability and deliverability/viability in particular detail. In assessing sites we have therefore necessarily focused on obvious constraints, taking account of the information we collected during our site visits.

3.3 Stage 2 – Assessment of Sites / Broad Locations

Estimating the Dwelling Potential of Each Site

3.3.1 In order to assess the number of dwellings that could theoretically be provided at each site, we applied a discount to take account of any permanent features such as water bodies, pylons and so on. We then applied the gross to net ratios identified in the below table in order to determine a realistic calculation of the theoretical yield that could be achieved at each site³:

Site Area	Gross-to-Net Ratio
< 0.5ha	100%
0.5 – 1.0ha	90%
1.0 – 1.5ha	80%
1.5 – 2.0ha	70%
>2.0ha	65%

3.3.2 As a matter of course in SHLAA studies we also reduce the gross area of any sites that are partially covered by nationally important nature conservation designations or Flood Zone 3b, although in accordance with the JMS, any sites that are entirely within Flood Zone 3 have been excluded from the assessment⁴.

³ The gross to net ratios are derived from 'Tapping the Potential' (DETR 2000), adapted by PBA to reflect our experience around the country, and the particular characteristics of North Warwickshire.

⁴ The mapping information provided by the Council does not distinguish between Flood Zones 3a and 3b.

3.3.3 Having identified the net developable area of each site, we then applied a density of 30 dwellings per hectare to all sites⁵, except those sites in town centres where a density of 50 dwellings per hectare has been applied, in accordance with the JMS. Where we have additional information (for example, through the 'call for sites' submissions) to justify an alternative density or dwelling yield then we have applied this manually.

3.3.4 The theoretical dwelling capacity of the sites was therefore calculated on the following basis:

$$\text{Gross site area} \times \text{permanent features factor} \times \text{gross to net factor} \times \text{density}$$

3.3.5 We would strongly urge the Council to regularly monitor market conditions, which will provide an updated view of potential changes in typical densities.

Assessing Suitability, Availability and Achievability

3.3.6 We subjected all of the sites in the spreadsheet to a comprehensive assessment against various 'suitability', 'availability' and 'achievability' criteria, as detailed in Appendix 2. The assessment criteria are closely related to the criteria referred to in the PPG and the JMS. Our assessments thus provide a good indication of each site's performance against a broad range of important measures.

3.3.7 Where constraints were identified that have an impact on the suitability, availability and achievability of sites, our assessment considered what action would be needed to overcome the constraint(s), along with when and how this could be undertaken and the likelihood of sites being delivered.

Suitability

3.3.8 As we explain more fully in Appendix 2, we took account of 'major planning considerations' relating to:

- impact on Areas of Outstanding National Beauty;
- flood risk;
- impact on European/National Wildlife Sites/Protected Species (SSSI, SPA, SAC, RAMSAR and Ancient Woodland);
- impact on heritage assets (listed buildings, registered parks and gardens or scheduled monuments);
- impact on Local Wildlife Site or Potential Local Wildlife Site; and
- impact on major infrastructure (namely the HS2 safeguarded area).

3.3.9 Adopting the approach set out in the agreed JMS, we took account of 'other planning considerations' relating to:

- impact on Grade 1 agricultural land;
- access to public transport;
- access to local facilities (i.e. whether the site is within or adjacent to Market Towns, Local Service Centres, or other defined settlements);
- impact on Tree Preservation Orders;

⁵ We note that the industry 'standard' density is currently around 36 dwellings per hectare, and so the density of 30 dwellings per hectare prescribed for North Warwickshire by the JMS should be regarded as conservative.

- impact on Air Quality Management Areas;
- site access;
- ground conditions; and
- neighbouring land uses (bad neighbours).

Availability

3.3.10 In assessing the availability of sites, we took account of anything that might affect availability, using known information. Sites held by a developer/willing owner/public sector – for instance, call for sites submissions, and sites being actively marketed – and sites where it is known that pre-application discussions are underway, fared better in the assessment than sites with established multiple uses or where there is thought to be particularly complex/multiple ownership⁶.

Achievability

3.3.11 The JMS requires the achievability of a site to only be assessed where it has been concluded that the site is suitable and available. The PPG advises that ‘achievability’ is essentially a judgment about the economic viability of a site, and for a strategic study such as this it is not necessary or practical to undertake a detailed viability appraisal for each site. Instead, our approach involves considering housing market issues at both the macro and micro levels, and other factors which are likely to influence/affect achievability, including known information relating to land values, geo-environmental factors, physical constraints, and so on. Accordingly, we took into account the following in carrying out the assessment:

- Market factors – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales;
- Cost factors – including site preparation costs relating to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, prospect of funding or investment to address identified constraints or assist development; and
- Delivery factors – including the developer’s own phasing, the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates), whether there is a single developer or several developers offering different housing products, and the size and capacity of the developer.

3.4 Stage 3 – Windfall Assessment

3.4.1 Windfall sites are those which have not been specifically identified in the SHLAA due to the local authority not being aware of them until a planning application is submitted. All sites assessed as part of the SHLAA process are considered to be identified sites and so are not windfall sites.

3.4.2 Paragraph 48 of the NPPF explains that windfall sites may be justified by the local authority as part of the housing land supply if *‘they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.’*

3.4.3 There is limited guidance in the PPG on how to assess windfalls. The JMS advises that the starting point for the estimation of windfall development is a review of monitoring data to

⁶ Unless there is strong evidence through a call for sites submission that the multiple uses/occupants at the site are capable of being relocated.

identify windfall sites that have historically been developed in each area. The windfall allowance must also include an estimation of the quantity of small sites, excluded from the SHLAA process at Stage 1, that are likely to come forward for development during the plan period.

- 3.4.4 The Council has not included a windfall allowance in its previous housing land supply statements, and we have no robust or reliable evidence to suggest that this will be a reliable source of housing supply going forward. On that basis we have not made an allowance for windfalls as part of our assessment. However, this situation should be carefully monitored and in the future, should a significant number of dwellings consistently come forward from previously unidentified sites, then the Council may wish to consider making an allowance for windfalls when updating the SHLAA.

3.5 Stage 4 – Assessment Review

Time Horizon and Study Base Date

- 3.5.1 The PPG states that once the sites and broad locations have been assessed, the development potential of all sites can be collated to produce an indicative trajectory, which sets out how much housing can be provided, and at what point in the future. The PPG advises that an overall risk assessment should be made to determine whether sites will come forward as anticipated.
- 3.5.2 Paragraph 47 of the NPPF requires LPAs to identify a supply of ‘*deliverable*’ sites for the first five years and a further supply of ‘*developable*’ sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. Each site was therefore assigned a reasonable expected timescale for delivery: 1-5 years, 6-10 years or 11-15 years. These timescales depend on the information known about each site in relation to its suitability and availability for housing at the time of the assessment.
- 3.5.3 We consider that 1 April 2016 represents an appropriate study base date, as this will ensure that the evidence presented on past completions and outstanding commitments is as up-to-date as possible. Accordingly, we have used that date as the starting point for assessing the five-year land supply, and have assessed housing potential for each of the forthcoming periods 2016 to 2021, 2016 to 2026, and 2016 to 2031. Using these dates brings the study in line with the end date of the Memorandum of Understanding between the Coventry and Warwickshire local authorities.
- 3.5.4 In accordance with the guidance, the SHLAA should be regularly kept up-to-date as part of the Annual Monitoring Report exercise, so as to support the updating of the housing trajectory and the rolling five-year supply of specific deliverable sites.

3.6 Stage 5 – Final Evidence Base

Site Categorisation

- 3.6.1 Stage 5 requires the production of core SHLAA outputs which includes an assessment of each site or broad location, in terms of its suitability, availability and achievability to determine whether a site is realistically expected to be developed and when.
- 3.6.2 Through our assessments of suitability, availability and achievability, each site was placed into one of three ‘Category’ bands⁷, as follows:
- Sites which perform well against the suitability, availability and achievability assessments, and are therefore affected by the fewest constraints, are considered to be ‘deliverable’ and were therefore placed into the **Green Category**⁸. It is important to emphasise that

⁷ Our definitions match those specified in footnotes 11 and 12 on page 12 of NPPF.

⁸ The JMS requires sites to be rated as ‘Green’, ‘Amber’ or ‘Red’ and so we have adopted these classifications.

for a site to achieve a Green Category rating, it would need to be suitable, and available (or capable of being made available) within five years, and achievable.

- Sites with a limited level of constraints such that they are likely to be available for delivery after the first five years were placed into the **Amber Category**. These 'developable' sites may be suitable for development, depending on their individual circumstances and on specific measures being proposed to overcome their constraints within a 6-10 year time horizon.
- Sites allocated to **Red Category** are classified as being 'not currently developable' and have more significant constraints. For these sites to be considered appropriate for development it would have to be clearly demonstrated that the significant constraints affecting these sites – which could relate to suitability, availability or achievability factors, or a combination thereof – can be mitigated or overcome to make them deliverable.

3.6.3 The overall categorisation of a site therefore depends on the particular combination of constraints affecting it. The scores achieved by each site in the spreadsheet under each criterion are used to determine why each site has been assigned to a particular Category band. Thus, it is immediately apparent from looking at the spreadsheet whether a site is affected by particular constraints and, hence, what sort of intervention will be required in order to make the site deliverable. A summary table containing all sites and their categorisation rating is provided in Appendix 4.

3.6.4 Predicting when each site is likely to come forward for development is not an exact science. The placing of a site into one of the three Category bands is therefore intended to give a useful indication of the deliverability and potential timing of a site's development and, hence, its suitability for inclusion as an allocation in the SAP.

3.6.5 The inclusion of a site in a higher Category band should not be taken to represent a recommendation that it should be allocated, as our categorisation process does not take account of all the policy considerations that are relevant in selecting sites for allocation. Equally, it should not be concluded that a site assigned to a lower Category band cannot come forward, or that it cannot be allocated for development. Rather, it would need to be demonstrated that the site's constraints could be overcome in order to secure its deliverability.

3.6.6 An indicative trajectory of anticipated development and consideration of associated risks is included within the following section.

4 Study Findings (Stage 5)

4.1 Introduction

- 4.1.1 In this section we provide the findings from the study and assess whether, and how, the identified dwelling targets could be achieved. In summary, our approach is to:
- identify the 5, 10 and 15-year dwelling targets, taking account of any previous under-provision against the identified targets;
 - identify the supply from housing commitments;
 - establish the potential supply from Green Category ('deliverable'), Amber Category ('developable') and Red Category ('not currently developable') sites; and
 - assess whether the identified supply from outstanding planning commitments and the 138 specific sites that we have assessed in the SHLAA is sufficient to meet the 5, 10 and 15-year dwelling targets.

4.2 Dwelling Targets

- 4.2.1 As we explained earlier in our report, whilst the adopted Core Strategy specifies a requirement for 3,650 net additional dwellings across the Borough over the plan period from 2011 to 2029, which equates to an average rate of 203 dwellings per annum, NWBC has agreed to sign a Memorandum of Understanding with other Coventry and Warwickshire authorities to deliver a minimum of 5,280 net additional dwellings from 2011 to 2031, equating to an average rate of 264 dwellings per annum. In addition, NWBC has been authorised to assess the feasibility of accommodating an additional 3,790 dwellings to assist with meeting Greater Birmingham's housing needs. It is therefore also necessary to assess whether 9,070 net additional dwellings can be delivered in North Warwickshire during 2011-2031, equating to an average rate of 454 dwellings per annum.
- 4.2.2 The latest data from the Council shows that, as of 31 March 2016, 706 net additional dwellings had been delivered in North Warwickshire since 2011. Based on the adopted Core Strategy housing requirement, this results in an accrued shortfall of 306 dwellings. Whilst this accrued shortfall relates to the currently adopted housing requirement, the housing targets for the Memorandum of Understanding and Greater Birmingham scenarios differ and therefore a shortfall of 306 dwellings is not relevant to this SHLAA assessment (that is, the specific shortfall varies dependent on the target being used).
- 4.2.3 Tables 4.1a and 4.1b show that, when taking account of existing completions, there is a minimum residual requirement of 4,574 dwellings for the remaining period 2016 to 2031 (under the 'MoU' scenario) and a maximum residual requirement of 8,364 dwellings for the same period (under the 'Greater Birmingham' scenario).

Table 4.1a Minimum Total Dwelling Requirement – 'Memorandum of Understanding' Scenario

Minimum Total Dwelling Requirement	
Minimum Memorandum of Understanding Target (2011 – 2031)	5,280 dwellings
Annual Average Requirement for Plan Period (5,280 / 20)	264 dwellings
Completions (2011 – 2016)	706 dwellings
Residual 15-Year Requirement (2016 – 2031)	4,574 dwellings

Table 4.1b Maximum Total Dwelling Requirement – ‘Greater Birmingham’ Scenario

Maximum Total Dwelling Requirement	
Maximum Target to help meet Greater Birmingham’s Housing Needs (2011 – 2031)	9,070 dwellings
Annual Average Requirement for Plan Period (9,070 / 20)	454 dwellings
Completions (2011 – 2016)	706 dwellings
Residual 15-Year Requirement (2016 – 2031)	8,364 dwellings

5-Year Dwelling Requirement (2016 to 2021)

4.2.4 As shown in Tables 4.2a, 4.2b, 4.2c and 4.2d, the minimum basic five-year requirement for North Warwickshire is 1,320 dwellings (264 dwellings x 5 years), whilst the maximum basic five-year requirement is 2,270 dwellings (454 x 5)⁹. Tables 4.2a and 4.2b show that when a 5 per cent NPPF ‘buffer’ and the accrued historic shortfall are added, this results in a minimum five-year requirement of 2,031 dwellings and a maximum five-year requirement of 4,026 dwellings. Tables 4.2c and 4.2d show that when a 20 per cent NPPF ‘buffer’ and the accrued historic shortfall are added, this results in a minimum five-year requirement of 2,321 dwellings and a maximum five-year requirement of 4,601 dwellings.

Table 4.2a Minimum 5-year Dwelling Requirement (2016 – 2021) with 5% NPPF ‘Buffer’ – ‘Memorandum of Understanding’ Scenario

Minimum 5-year Dwelling Requirement (2016 - 2021)	
Basic 5-year Requirement (264 x 5)	1,320 dwellings
Add Accrued Shortfall (2011 to 2016)	614 dwellings
<i>Add 5% Buffer</i>	97 dwellings
5-year Requirement including 5% ‘Buffer’	2,031 dwellings

Table 4.2b Maximum 5-Year Dwelling Requirement (2016 – 2021) with 5% NPPF ‘Buffer’ – ‘Greater Birmingham’ Scenario

Maximum 5-year Dwelling Requirement (2016 - 2021)	
Basic 5-year Requirement (454 x 5)	2,270 dwellings
Add Accrued Shortfall (2011 to 2016)	1,564 dwellings
<i>Add 5% Buffer</i>	192 dwellings
5-year Requirement including 5% ‘Buffer’	4,026 dwellings

Table 4.2c Minimum 5-year Dwelling Requirement (2016 – 2021) with 20% NPPF ‘Buffer’ – ‘Memorandum of Understanding’ Scenario

Minimum 5-year Dwelling Requirement (2016 - 2021)	
Basic 5-year Requirement (264 x 5)	1,320 dwellings
Add Accrued Shortfall (2011 to 2016)	614 dwellings
<i>Add 20% Buffer</i>	387 dwellings
5-year Requirement including 20% ‘Buffer’	2,321 dwellings

⁹ By ‘minimum requirement’ we mean the requirement based on the Memorandum of Understanding target, and ‘maximum requirement’ relates to the scenario whereby North Warwickshire assists with meeting Greater Birmingham’s housing needs. We have therefore not assessed the ‘Core Strategy only’ requirement.

Table 4.2d Maximum 5-Year Dwelling Requirement (2016 – 2021) with 20% NPPF 'Buffer' – 'Greater Birmingham' Scenario

Maximum 5-year Dwelling Requirement (2016 - 2021)	
Basic 5-year Requirement (454 x 5)	2,270 dwellings
Add Accrued Shortfall (2011 to 2016)	1,564 dwellings
<i>Add 20% Buffer</i>	767 dwellings
5-year Requirement including 20% 'Buffer'	4,601 dwellings

10-Year Dwelling Requirement

- 4.2.5 Tables 4.3a, 4.3b, 4.3c and 4.3d show that the 10-year target is calculated by adding together the first five-year requirement and the basic requirement for the second five-year period. When the accrued historic shortfall and a 5 per cent NPPF 'buffer' are added, this equates to a minimum 10-year requirement of 3,351 dwellings and a maximum 10-year requirement of 6,296 dwellings. When a 20 per cent NPPF 'buffer' and the accrued historic shortfall are added, this equates to a minimum 10-year requirement of 3,641 dwellings and a maximum 10-year requirement of 6,871 dwellings.

Table 4.3a Minimum 10-year Dwelling Requirement (2016 – 2026) with 5% NPPF 'Buffer' – 'Memorandum of Understanding' Scenario

Minimum 10-year Dwelling Requirement (2016 - 2026)	
Minimum 5-year Requirement including shortfall and 5% NPPF 'Buffer'	2,031 dwellings
<i>Add Second Five-Year Requirement</i>	1,320 dwellings
10-year Requirement including 5% NPPF 'Buffer'	3,351 dwellings

Table 4.3b Maximum 10-Year Dwelling Requirement (2016 – 2026) with 5% NPPF 'Buffer' – 'Greater Birmingham' Scenario

Maximum 10-year Dwelling Requirement (2016 - 2026)	
Maximum 5-year Requirement including shortfall and 5% NPPF 'Buffer'	4,026 dwellings
<i>Add Second Five-Year Requirement</i>	2,270 dwellings
10-year Requirement including 5% 'Buffer'	6,296 dwellings

Table 4.3c Minimum 10-year Dwelling Requirement (2016 – 2026) with 20% NPPF 'Buffer' – 'Memorandum of Understanding' Scenario

Minimum 10-year Dwelling Requirement (2016 - 2026)	
Minimum 5-year Requirement including shortfall and 20% NPPF 'Buffer'	2,321 dwellings
<i>Add Second Five-Year Requirement</i>	1,320 dwellings
10-year Requirement including 20% 'Buffer'	3,641 dwellings

Table 4.3d Maximum 10-Year Dwelling Requirement (2016 – 2026) with 20% NPPF 'Buffer' – 'Greater Birmingham' Scenario

Maximum 10-year Dwelling Requirement (2016 - 2026)	
Maximum 5-year Requirement including shortfall and 20% NPPF 'Buffer'	4,601 dwellings
<i>Add Second Five-Year Requirement</i>	2,270 dwellings
10-year Requirement including 20% 'Buffer'	6,871 dwellings

15-year Dwelling Requirement

- 4.2.6 Tables 4.4a and 4.4b show that the 15-year target is calculated by adding together the basic 15-year requirement and the accrued shortfall. Unlike with the five- and ten-year targets, it is

not appropriate to include an NPPF ‘buffer’ within the 15-year target because the NPPF buffer in the early years of the plan period is simply moved forward from later in the plan period. Table 4.4a shows that when the accrued historic shortfall is added to the minimum ‘Memorandum of Understanding’ scenario, the 15-year target is 4,574 dwellings, whilst when applying the maximum ‘Greater Birmingham’ Scenario, the 15-year target is 8,374 dwellings¹⁰.

Table 4.4a Minimum 15-year Dwelling Requirement (2016 – 2031) – ‘Memorandum of Understanding’ Scenario

Minimum 15-year Dwelling Requirement (2016 - 2031)	
Basic 5-year Requirement (264 x 15)	3,960 dwellings
Add Accrued Shortfall (2011 to 2016)	614 dwellings
15-year Requirement	4,574 dwellings

Table 4.4b Maximum 15-year Dwelling Requirement (2016 – 2031) – ‘Greater Birmingham’ Scenario’

Maximum 15-year Dwelling Requirement (2016 - 2031)	
Basic 5-year Requirement (454 x 15)	6,810 dwellings
Add Accrued Shortfall (2011 to 2016)	1,564 dwellings
15-year Requirement	8,374 dwellings

4.3 Housing Commitments

- 4.3.1 The latest data provided by the Council indicates that there is a supply of 1,056 dwellings from extant commitments. However, it is reasonable to assume that not all of the commitments will be delivered in their current form and that not all outstanding allocations will come forward. For instance, in some cases the developer will probably have to amend its intentions in order to make the scheme more viable because of current economic circumstances. Other unforeseen factors often result in a degree of non-implementation (such as the developer going bust or the landowner changing its intentions), and some permissions for significant numbers of units might not be delivered in their entirety within five years. Similarly, not all outstanding allocations will necessarily deliver the expected quantum of housing, or come forward at all due to a variety of market and cost factors.
- 4.3.2 Consequently, to ensure a robust approach, we consider that there is a need to make an allowance for ‘non-delivery’ and ‘non-implementation’ of a proportion of the outstanding residential planning permissions and allocations. Applying a ‘non-delivery rate’ and a ‘non-implementation rate’ will ensure that the Borough’s housing supply is not over-reliant on extant planning permissions and allocations, which may not all progress in practice.
- 4.3.3 Accordingly, in order to ensure that our assessment is as robust and realistic as possible, we have applied the following discounts to the dwelling yields from the commitments/allocations that we have not subjected to site-specific assessment:
- A ‘non-implementation’ rate of 10 per cent to the total dwelling supply from commitments and allocations. These dwellings are assumed to never come forward and are completely removed from the housing supply. This amounts to a reduction of 106 units, leaving a residual supply of 950 units.
 - A ‘non-delivery’ rate of 15 per cent to the five-year supply from non-implemented sites – these dwellings are not lost from the supply, but are instead shifted into the 2021-2026 period on the basis that they might still come forward, but not in the first five-year period. This enables a more realistic assessment of the likely five-year supply position to be reached. From the residual 950 dwellings, a further 142 dwellings are removed from the five-year supply, but then reinstated for the subsequent 10-year and 15-year periods, leaving 808 dwellings in the first five-year period.

¹⁰ These 15-year dwelling requirements do not necessarily equate to the total dwelling requirements identified in Tables 4.1a and 4.1b due to rounding differences.

- 4.3.4 We have used the adjusted supply figures described above when assessing the adequacy of housing supply from commitments/allocations and SHLAA sites.
- 4.3.5 Future updates of the SHLAA will provide an opportunity to update the number of outstanding residential commitments/allocations.

4.4 Theoretical Dwelling Supply

- 4.4.1 We have identified the theoretical dwelling supply from the 138 SHLAA sites, which have been placed into one of the three category bands:
- Green Category (deliverable) – site is suitable, available and achievable and faces no constraints which might prevent it from coming forward within the first five-year period;
 - Amber Category (developable) – site faces some constraints of either suitability, availability or achievability and would not be expected to come forward within the first five-year period, but could still be expected to come forward within the second five-year period; and
 - Red Category (not currently developable) – site faces more significant constraints, and would not be expected to come forward within the first 10-year period of the study, although it might be expected to come forward in the third five-year period.
- 4.4.2 Table 4.5 below summarises the theoretical dwelling supply from all 138 sites, broken down by category band and land type:

Table 4.5 Overall Summary of Theoretical Supply from SHLAA Sites

		Category			Total
		Green	Amber	Red	
Previously Developed	Area (ha)	3.1	26.9	105.7	135.7
	Yield	94	806	3,169	4,069
Greenfield	Area (ha)	35.3	258.9	174.9	469.1
	Yield	1,058	7,765	5,248	14,071
Green Belt	Area (ha)	36.3	149.1	90.9	276.3
	Yield	1,089	4,475	2,728	8,292
Total	Number of Sites	30	71	37	138
	Area (ha)	75	435	371	881
	Yield	2,241	13,046	11,145	26,432

- 4.4.3 The table above shows that:
- The 138 assessed sites could potentially yield around 26,432 dwellings.
 - Of the theoretical 26,432 unit capacity, 2,241 units are on 30 sites assessed as being 'deliverable' (i.e. Green Category), with a further 13,046 units on 71 'developable' sites (Amber Category) and 11,145 units are on 37 sites which are not currently developable (Red Category) but which could potentially come forward at some point in the future.
 - Of the theoretical 26,432 unit capacity, previously developed sites could yield 4,069 dwellings, of which 94 units could come forward in the first five-year period (Green Category), a further 806 units have been identified on 'developable' PDL sites (Amber Category) and 3,169 units are not currently developable (Red Category).
 - Of the theoretical 26,432 unit capacity, greenfield sites could yield 14,071 dwellings, of which 1,058 units could come forward in the first five year period (Green Category), a

further 7,765 units have been identified on 'developable' greenfield sites (Amber Category) and the remaining 5,248 units are not currently developable (Red Category).

- Of the theoretical 26,432 unit capacity, Green Belt sites could provide 8,292 dwellings, of which 1,089 units could come forward in the first five-year period (Green Category), a further 4,475 units have been identified on 'developable' Green Belt sites (Amber Category) and the remaining 2,728 units from Green Belt sites are not currently developable (Red Category).
- Owing to lead-in times and build-out periods, it is important to consider the role of phasing, especially for larger sites. We have assumed that an individual site is unlikely to deliver more than 250 units in any five-year period. For sites which are capable of generating a theoretical dwelling yield of over 250 units we have spread the dwellings access the following time-period bands: 1-5 years, 6-10 years, 11-15 years, and 'beyond plan period'. Table 4.6 below summarises the theoretical dwelling supply from all SHLAA sites, broken down by time horizon and also by Green Belt¹¹:

Table 4.6 Summary of Supply of SHLAA Housing Sites by Time-Horizon

	Total Theoretical Dwelling Yield	Green Belt Theoretical Dwelling Yield	Outside Green Belt Theoretical Dwelling Yield
Years 0-5	1,748	1,080	668
Years 6-10	7,013	2,128	4,885
Years 11-15	8,533	2,726	5,807
SUB-TOTAL (Within Plan Period)	17,294	5,934	11,360
<i>Beyond Plan Period</i>	<i>9,138</i>	<i>2,386</i>	<i>6,752</i>
TOTAL	26,432	8,320	18,112

4.4.4 From the table above, it can be seen that of the 26,432 total theoretical dwelling yield:

- 1,748 dwellings could be expected to come forward for development in Years 0-5, of which 1,080 dwellings (62 per cent) are from sites where 50 per cent or greater is currently designated within the Green Belt.
- 7,013 dwellings could potentially come forward for development in Years 6-10, of which 2,128 dwellings (30 per cent) are from sites where 50 per cent or greater is currently designated within the Green Belt.
- 8,533 dwellings could theoretically come forward for development in Years 11-15, of which 2,726 dwellings (32 per cent) are from sites where 50 per cent or greater is currently designated Green Belt.

¹¹ Where the site is not currently designated within the Green Belt or less than 50 per cent of the site is currently designated within the Green Belt. Please note that the Green Belt yield in Table 4.5 is based on the Green Belt status of the entire site, whilst the Green Belt Yield in Table 4.6 accounts just for sites for which greater than 50 per cent of the site is within the Green Belt. This discrepancy of accounts for the difference of 28 units (8,320 – 8,292) between the Green Belt Theoretical Dwelling Yield in Tables 4.5 and Tables 4.6.

- 9,138 dwellings could be expected to come forward for development beyond the plan period, of which 2,386 dwellings (26 per cent) are from sites where 50 per cent or greater is currently designated Green Belt.

4.5 Adequacy of Housing Provision

4.5.1 In Tables 4.7a, 4.7b, 4.7c and 4.7d below we assess whether the minimum and maximum dwelling targets for North Warwickshire can be achieved through a combination of the 138 specific SHLAA sites together with outstanding planning commitments and allocations.

Approach

4.5.2 The components of potential housing supply, as set out in Tables 4.7a, 4.7b, 4.7c and 4.7d below, are referenced as follows:

- PP&A = dwellings with planning permission ('PP') at 31 March 2016 and outstanding allocations ('A') which were still to be delivered at that date (having made an allowance for non-delivery and non-implementation, as described earlier in this section); and
- GC, AC, RC = potential from the 138 sites in the SHLAA in Green, Amber and Red Category bands respectively.

4.5.3 There is no definitive 'answer' and so, within each period, the theoretical yield from a combination of components is compared with the dwelling target for the period. Where a combination is sufficient to meet the target, the yield is highlighted in green. It is therefore immediately apparent to what extent the potential housing supply for a period is sufficient to meet the target. This approach is adopted for the yield from previously developed land¹²; the yield from previously developed land and greenfield sites; and the yield from previously developed land and greenfield Green Belt sites¹³.

4.5.4 At the outset it is important to note that our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation, which are likely to include the broad sustainability of the total development pattern, Green Belt, impact on biodiversity and landscape, and strategic transport and other infrastructure capacity issues. Thus, we have not undertaken any analysis to consider whether the theoretical supply from sites assessed within the SHLAA is in the right place to meet strategic policy objectives (noting that the Council already has an adopted Core Strategy which sets the distribution across the Borough's various settlements).

4.5.5 Similarly, we have not considered whether it would be better to remove the obstacles affecting PDL sites within the Amber Category and bring these sites forward in advance of Green Category sites. Moreover, the SHLAA does not assess whether it would be preferable to consider the release of some Green Belt land in appropriate locations and bring this forward in advance of more heavily constrained and/or less sustainably located sites that are currently outside the Green Belt, regardless of which 'category' band they have been placed in. These issues are beyond the scope of a SHLAA and will need to be considered through the plan preparation process.

¹² It should be noted that the 'PDL yield' figures in the tables include the contribution from extant planning permissions and allocations, which may include some greenfield sites.

¹³ Any previously developed Green Belt sites have been treated in the same way as other PDL sites, and so they do not contribute to the 'Green Belt Yield' figures.

Table 4.7a Adequacy of Cumulative Dwelling Potential in North Warwickshire, Forthcoming 5, 10 and 15-Year Periods – Using the Minimum ‘Memorandum of Understanding’ Housing Requirement with 5 per cent NPPF ‘Buffer’

Period	Component	Total Theoretical Yield	Outside Green Belt Theoretical Yield
First 5 years	PP&A	808	808
	PP&A + GC	2,556	1,476
	PP&A + GC + AC	9,569	6,361
	PP&A + GC + AC + RC	18,102	12,168
	Dwelling Requirement	2,031	
First 10 years	PP&A	950	950
	PP&A + GC	2,698	1,618
	PP&A + GC + AC	9,711	6,503
	PP&A + GC + AC + RC	18,244	12,310
	Dwelling Requirement	3,351	
First 15 years	PP&A	950	950
	PP&A + GC	2,698	1,618
	PP&A + GC + AC	9,711	6,503
	PP&A + GC + AC + RC	18,244	12,310
	Dwelling Requirement	4,574	

Table 4.7b Adequacy of Cumulative Dwelling Potential in North Warwickshire, Forthcoming 5, 10 and 15-Year Periods – Using the Minimum ‘Memorandum of Understanding’ Housing Requirement with 20 per cent NPPF ‘Buffer’

Period	Component	Total Theoretical Yield	Outside Green Belt Theoretical Yield
First 5 years	PP&A	808	808
	PP&A + GC	2,556	1,476
	PP&A + GC + AC	9,569	6,361
	PP&A + GC + AC + RC	18,102	12,168
	Dwelling Requirement	2,321	
First 10 years	PP&A	950	950
	PP&A + GC	2,698	1,618
	PP&A + GC + AC	9,711	6,503
	PP&A + GC + AC + RC	18,244	12,310
	Dwelling Requirement	3,641	
First 15 years	PP&A	950	950
	PP&A + GC	2,698	1,618
	PP&A + GC + AC	9,711	6,503
	PP&A + GC + AC + RC	18,244	12,310
	Dwelling Requirement	4,574	

Table 4.7c Adequacy of Cumulative Housing Potential in North Warwickshire, Forthcoming 5, 10 and 15-Year Periods – Using the Maximum ‘Greater Birmingham’ Housing Requirement with 5 per cent NPPF ‘Buffer’

Period	Component	Total Theoretical Yield	Outside Green Belt Theoretical Yield
First 5 years	PP&A	808	808
	PP&A + GC	2,556	1,476
	PP&A + GC + AC	9,569	6,361
	PP&A + GC + AC + RC	18,102	12,168
	Dwelling Requirement	4,026	
First 10 years	PP&A	950	950
	PP&A + GC	2,698	1,618
	PP&A + GC + AC	9,711	6,503
	PP&A + GC + AC + RC	18,244	12,310
	Dwelling Requirement	6,296	
First 15 years	PP&A	950	950
	PP&A + GC	2,698	1,618
	PP&A + GC + AC	9,711	6,503
	PP&A + GC + AC + RC	18,244	12,310
	Dwelling Requirement	8,374	

Table 4.7d Adequacy of Cumulative Housing Potential in North Warwickshire, Forthcoming 5, 10 and 15-Year Periods – Using the Maximum ‘Greater Birmingham’ Housing Requirement with 20 per cent NPPF ‘Buffer’

Period	Component	Total Theoretical Yield	Outside Green Belt Theoretical Yield
First 5 years	PP&A	808	808
	PP&A + GC	2,556	1,476
	PP&A + GC + AC	9,569	6,361
	PP&A + GC + AC + RC	18,102	12,168
	Dwelling Requirement	4,601	
First 10 years	PP&A	950	950
	PP&A + GC	2,698	1,618
	PP&A + GC + AC	9,711	6,503
	PP&A + GC + AC + RC	18,244	12,310
	Dwelling Requirement	6,871	
First 17 years	PP&A	950	950
	PP&A + GC	2,698	1,618
	PP&A + GC + AC	9,711	6,503
	PP&A + GC + AC + RC	18,244	12,310
	Dwelling Requirement	8,374	

Summary of Findings

- 4.5.6 Tables 4.7a to 4.7d confirm that outstanding planning permissions and allocations in the Borough are unable to meet the minimum dwelling target for the first five years of 2,031 dwellings with a 5 per cent buffer and therefore also the minimum dwelling target of 2,321 dwellings with a 20 per cent buffer. It follows that outstanding planning permissions and allocations in the Borough are also unable to meet the maximum dwelling target for the first five years under the 5 per cent buffer and a 20 per cent buffer scenarios.
- 4.5.7 The minimum ‘Memorandum of Understanding’ five-year target of 2,031 dwellings using a 5 per cent buffer can theoretically be achieved solely through sites outside of the Green Belt using sites within the Green Category in tandem with sites in the Amber Category.

Alternatively, the minimum five-year target using a 5 per cent buffer can be met using sites within the Green Category, but it would be necessary to bring forward sites within the Green Belt. These same combinations also apply to fully meet the minimum five-year dwelling requirement of 2,321 dwellings using a 20 per cent buffer.

- 4.5.8 To meet the maximum 'Greater Birmingham' five-year target using a 5 per cent buffer or 20 per cent buffer it would be necessary for sites within the Green Category and Amber Category to be bought forward. Theoretically, it would not be necessary to bring forward Green Category and Amber Category sites within the Green Belt to meet the maximum five-year target using either a 5 per cent or 20 per cent buffer.
- 4.5.9 In order to achieve the minimum 'Memorandum of Understanding' 10-year target using a 5 per cent buffer or 20 per cent buffer, it is necessary to bring forward sites in the Green Category, in combination with sites within the Amber Category. It would not be necessary to bring forward sites within the Green Belt to meet this dwelling requirement.
- 4.5.10 To meet the maximum 'Greater Birmingham' 10-year target using a 5 per cent buffer it would be necessary for Green Category and Amber Category sites to be bought forward for development. This dwelling requirement can be achieved using sites outside of the Green Belt. To meet the maximum 'Greater Birmingham' 10-year target using a 20 per cent buffer it would be necessary for Green Category and Amber Category sites within the Green Belt to be bought forward for development. Alternatively, Green Category and Amber Category sites outside of the Green Belt, in addition to some more constrained Red Category outside of the Green Belt could be bought forward to meet this dwelling requirement.
- 4.5.11 Theoretically, there is sufficient land to meet the Borough's minimum 15-year dwelling target of 4,574 dwellings using Green Category and Amber Category sites outside of the Green Belt. However, meeting the Borough's maximum 15-year dwelling target of 8,374 dwellings would require Green Belt sites within the Green Category and Amber Category to be bought forward, or alternatively Green Category and Amber Category sites outside of the Green Belt, in addition to some more constrained Red Category sites outside of the Green Belt.
- 4.5.12 The findings from the process above indicate that outstanding permissions and allocations are insufficient to meet the five-year housing requirement. However, the 138 SHLAA sites which we assessed in the study, when considered together with outstanding planning commitments and allocations, are theoretically capable of providing sufficient dwellings to meet the five-year, 10-year and 15-year dwelling requirements based on the minimum Coventry and Warwickshire 'Memorandum of Understanding' dwelling target and the maximum target under the scenario whereby North Warwickshire will also help to meet some of Greater Birmingham's housing needs.
- 4.5.13 It is important to emphasise that 41 of the 138 SHLAA sites which have been assessed are fully or partially within the Green Belt. Within the plan period, the potential dwelling yield from sites within the Green Belt (of 5,934 units) amounts to 34 per cent of the overall theoretical yield of 17,294 units. If the theoretical supply from units within the Green Belt is removed from the assessment, 11,360 units could be delivered from land which is currently not within the Green Belt, within the plan period.
- 4.5.14 Given that the maximum 15-year dwelling requirement for North Warwickshire is 8,374 dwellings, the finding outlined above would suggest that the release of Green Belt land is not required in order for the Borough to meet its housing requirements up to 2031. However, as we have explained, our site categorisation does not take account of all the policy considerations that are relevant in selecting sites for allocation, which are likely to include the broad sustainability of the total development pattern, impact on biodiversity and landscape, and strategic transport and other infrastructure capacity issues. Thus, we have not undertaken any analysis to consider whether the theoretical supply from the sites we have assessed is in the right place to meet strategic policy objectives. If not then it could well be necessary to release some Green Belt land in order to achieve the targets in full. These issues are beyond the scope of a SHLAA and will need to be considered through the plan preparation process.