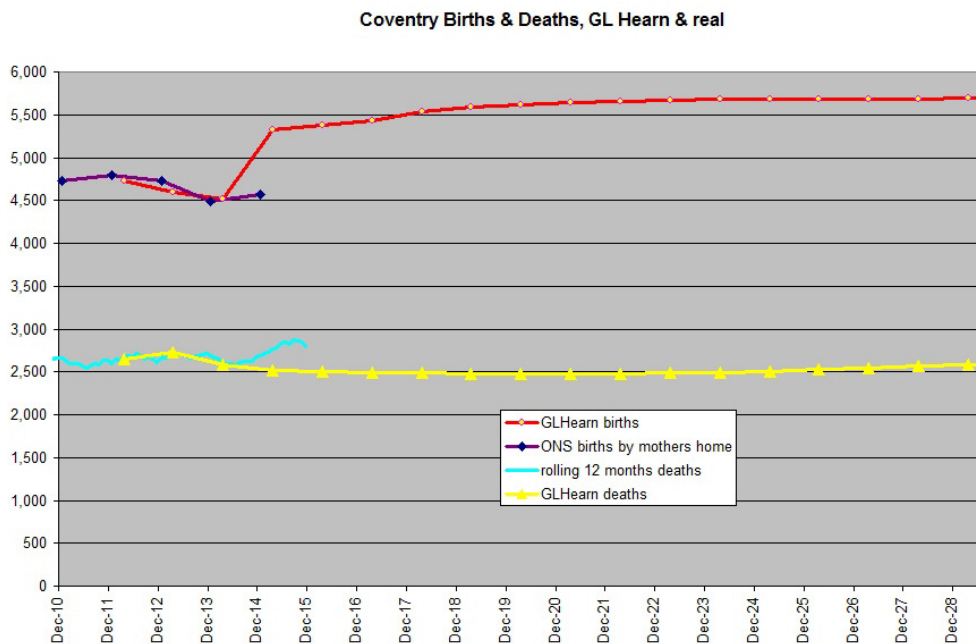7. Please give details of why you consider the Proposed Modifications to the Submission Warwick District Local Plan are not legally compliant or are unsound. Please be as precise as possible.

The assumptions and modelling of the SHMA undertaken by GL Hearn is flawed.

1) It is clear form detailed modelling year by year data that the population is not growing as expected. In particular there has been a very significant move of student age population from Warwickshire into Coventry as a result of the expansion of two universities, the move to get 50% of young people into university education and significant building of student accommodation in the city of Coventry. The student population has not been correctly modelled but just lumped into the overall population. The big impacts of this are that many students move on to other areas or countries when they complete their studies, Students tend to raise families later and many students live in student blocks or houses of multiple occupancy. The continuous large net migration into Coventry is already dropping sharply as the rise in outflows will lag the rise in inward migration by the average length of stay.
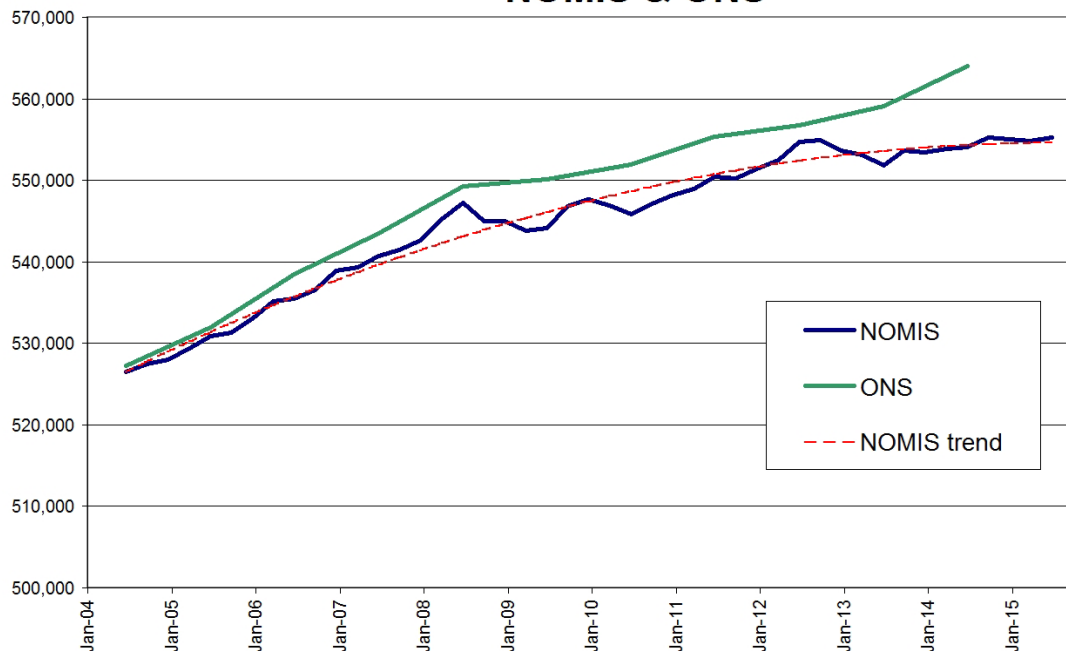
There seems to be a significant over estimation of Coventry population in ONS mid-year estimate. The ONS seem to capture births, deaths and inward migration but under report healthy working age people who often do not register with GPs, and if they do fail to de-register. The government workforce population study clearly indicates the working age (16 to 64) population is growing in the housing market area at a slower rate than the main ONS estimates.

Graph 1 –Coventry City Council released year by year SHMA Coventry births and deaths against real ONS data.

Coventry Births & Deaths, GL Hearn & real

Graph 2 – Coventry and Warwickshire working age population

Coventry & Warwickshire 16 to 64 population from NOMIS & ONS

2) Unsound cherry picking from two models

The outcome of the SHMA considerably over estimates the increases in housing need. The SHMA uses two types of models, one based on population demographics rolled forward and ones based on economic/employment.

Both models have flaws, the economic model is totally unrealistic for Nuneaton and Bedworth while the demographic model ignores the effects of having a large student population. Both however give an estimated housing need of 600 for Warwick district. GL Hearn and council officers have selected a target for each council area in effect to choose whichever number is biggest and then add a bit. That way the annual target of 3,731 or 4,197 becomes 4,598. That is not a sound or valid way to model a housing region. In effect a person who lives in Nuneaton in the Economic model may live in Coventry based on the Demographic model. Cherry picking on a council-by-council way counts him twice.

Table from GL Hearn update to SHMA with added colour and corrected total.

	Economic-led Need	Demographic based Need	Supporting Economic Growth	Improving Affordability	Total
Coventry	1,350	2,099	0	21	2,120
North Warwickshire	210	163	47	27	237
Nuneaton & Bedworth	496	423	73	6	502
Rugby	425	464	0	16	480
Stratford-on-Avon	650	449	201	9	659
Warwick	600	600	0	0	600
Coventry/Warwickshire	3,731	4,197	-	75	~~2,272~~
	E	**D**	**S**	**I**	4,598
	Economic model output	Demographic model	If (D<E) then s= E-D Else S=0	Add even more	Big total

In the end GL Hearn can inflate the 3,731 homes needed by Economic model by 23% to get a requirement for the area of 4,598 homes a year.

3) Nuneaton and Bedworth should not sign up to the MOU to take on additional housing. Its working age population is now in significant decline. I have attached my response to their local plan consultation.