# **SOUTH WARWICKSHIRE LOCAL PLAN RESPONSE**

**SUMMARY POINTS FROM GERALD KELLS’ REPORT**

**SHARED WITH ANDREW DAY AND PHILIP CLARKE, WDC, Monday February 27th 2023.**

**Our overall contention is that housing requirement and future land supply for South Warwickshire have not been accurately judged.**

**This matters because the erroneous estimate by Coventry of 32% population growth has led to blighting of countryside areas in S Warwickshire to meet a need that never materialized.**

**Coventry estimated that 85% of overseas students would remain post-study. The average figure is 15%. The 2021 ONS Census numbers show that 17-18,500 fewer households live in Coventry than the City estimated. (But the houses have still been built…)**

**WE BASE OUR CONCLUSIONS ON SIX KEYPOINTS FROM GERALD KELLS’ REPORT.**

1. **WINDFALLS**

* The SWLP allows for land for 220 dwellings per annum (DPA) from windfalls.
* Actual annual average windfall numbers since 2011 have been **901.**
* 69% of Stratford’s housing site needs since 2011 have been met from Windfalls; 44% of Warwick’s.
* If instead of 220 DPA’s (as in plan) the SWLP assumed only **half** the annual average, (**450** homes) the housing land shortfall drops from **23,000** to **1510** in 2040; **5,410** in 2045 and **9310** in 2050.
* If the actual average since 2011 – **901 -** is used, **the plan is in surplus:**  **5,255** excess house spaces in 2040; 3**610** excess in 2045. **1965** in 2050.
* In addition to a severe underestimate of overall numbers, the Local Planning guidance only includes within the 220, those spaces for fewer than 9 dwellings. So places like the Ford Foundry site, the King’s High School sites, land adjacent to Leamington Spa Station, and others for more than 9 homes would not be included.
* We believe that this also seriously distorts likely available land, based on figures since 2011.

1. **AFFORDABILITY UPLIFTS**

* Under a formula devised in 2004, housing numbers are automatically increased in more expensive areas, on the assertion that building more houses will bring down prices.
* **This has nothing whatsoever to do with actual housing need.**
* ONS numbers from the base year used (2014) assessed the SWLP area **need** at **874** homes. The Affordability formula increases this to **1,239.** These are the numbers used in the SWLP.
* This is an increase of **42%** over **need**.

1. **IN-MIGRATION**

* Housing numbers like Coventry’s encourage net in-migration to local areas. They are not a response to endogenous growth.
* **76%** of Warwick’s estimated population growth for 2018-2028 comes from net in-migration.
* **118%** of Stratford’s is from the same source. (ie. Just on birth rate, without in-migration, the population would decline).
* **This therefore risks becoming a self-replicating cycle. (“We’ve filled more houses, therefore we need more houses, therefore…”)**

1. **DUTY TO CO-OPERATE**

* Housing was built in the SWLP area as a response to Coventry’s overestimates, destroying swathes of prime farmland in the process.
* This is part of the ‘Duty to Cooperate’ imposed on neighbouring areas, when the ‘growing’ area does not have the requisite space.
* The government has added 35% to assessed need in 20 key cities. (In theory this means that more urban brownfield sites are used.) Applying this to **Birmingham** gives them **three times their demographic need**.
* Birmingham (for whom Gerald has also produced an excellent report) does not have space for these numbers.
* This potentially means that over the plan period South Warwickshire will have to build houses they don’t want for a Birmingham need that doesn’t exist.
* The Black Country (also subject to one of Gerald’s Reports) has currently abandoned its Local Plan for similar reasons.

1. **EMPLOYMENT LAND NEEDS**

* We would ask those responsible for the SWLP to reconsider Employment land needs.
* Numbers don’t reflect the estimated **30%** reduction in office space post-Covid.
* There is also a visible increase in Town Centre vacant retail sites across the region.
* In particular, Stratford is estimated to need **132.8Ha** (333 acres) of **Industrial** Land.
* This puts it only behind Rugby (Cement and extraction) and Coventry (automotive).
* We have asked for an explanation of how this number was derived.

1. **TIMEFRAME**

* The SWLP framework extends from **2025** to **2050,** to allow for long-term infrastructure planning.
* This is considerably longer than most planning frameworks.
* Increasing the plan from the more usual 15 years, **increases SWLP housing numbers by 50%.** (And therefore countryside blight).
* Remaining with 15 years, instead of **35,000 houses by 2050** we would be looking at **23,370 by 2040.**

**For the above six reasons, and so that more agricultural and greenbelt land is not needlessly destroyed, we ask that those responsible reconsider the base assumptions underpinning the South Warwickshire Local Plan, and take serious note of Gerald Kells’ more detailed statistical evidence, from which this summary is derived.**

**JACL 01.03. 2023**