

Willis, Amanda

To: Chris Cooke
Subject: RE: Cllr Chris Cooke - Tamworth Local Plan - representation

From: Chris Cooke
Sent: 03 June 2015 17:56
To: External Email for Programme Officer
Subject: Cllr Chris Cooke - Tamworth Local Plan - representation

FAO Amanda Willis

Programme Officer for Tamworth Borough Council
Tamworth Local Plan

Please find below my submission to the Tamworth Local Plan

Apologies for cutting the deadline fine.

To save confusion later can I please make clear that although I was a Tamworth Borough Councillor for 12 years I did stand down in May. However, I do remain a County Councillor and I certainly maintain an interest in the Local Plan process.

Please let me know that this is received and is acceptable.

Thank you

Cllr Chris Cooke

----- submission begins -----

Theme 1 - 4.3 & 4.4 - Household Needs Assessment & Job Trends.

Nathaniel Lichfield and Partners (NLP) were the consultants charged with assessing the Housing numbers. I have a number of concerns.

a) *Raw Data Input.* I had no access to the raw data input. I asked officers if I could check this, I was informed it was ONS data, but was told only that I could go to Manchester to see the computer working and that the methodology was "approved". Without this information it has been impossible to check what seems to be errors in the output.

b) *Output error.* There are 11 scenarios produced by NLP in their update report from October 2014. The figures that are output are copious and in impossibly tiny text. It can be seen though, in the last three scenarios (Experian Jobs, Job Stabilisation, Past Trends Jobs Growth) that the Summary of Population Estimates Forecast output data for the years 2012/13/14 are clearly very wrong. For instance on "Past Trends Job Growth" it has Tamworth's population falling by 2,461 in the single year 2012/13 and then gradually reducing year on year to 2031. I have asked Tamworth Officers about these errors and the promised to get back to me - but never did. The outcome has been that these three scenarios have been "discounted" as "obviously wrong". My position is that it is clear they are obviously wrong and so they should be corrected - not ignored. It is unrealistic, and contrary to National Planning Policy Framework (NPPF), that past job trends are not taken into account.

c) *Job Trends.* And these Job Trends are indeed significant. In the years I've lived in Tamworth I've seen most of Tamworth's Industry shut down. The Reliant Factory, Cincinatti Machine Tools, Probus, Doultons, the Paper Mills and all the big job producers have gone. Their factory sites became new housing estates. So there is a continuous history of job loss in Tamworth eased only by the retail sector. If these true job trends were used, even allowing for reasonable "aspirations" it would

become clear that Tamworth's population will not be growing as a result of more employment - short of a miracle.

Turning to the housing calculation figures -

Tamworth Population / Dwelling Data.

INTERNAL MIGRATION

These figures are obtained from the Office for National Statistics (ONS). This should be the same base as for Nathaniel, Lichfield and Partners (NLP) figures.

This first table gives Migrations

<i>Year</i>	<i>NETT</i>	<i>IN</i>	<i>OUT</i>
2011	- 300	2500	2800
2012	- 270	2620	2890
2013	- 420	2690	3110
(average)	(- 330)	(2603)	(2933)

This average of -330 (negative migration) is for the most up to date three years. This is more than previous years which averaged at about -130. The question is will this trend continue or stabilise or reverse? NLP gives a number of scenarios - all of them optimistically forecasting increases in inward migration. No NLP scenario allows for the average found above. This will seriously skew the figures. Just being 100 out each year will amount to 2500 population & (using headship of 2.43) 1029 excess dwellings over the plan period. It isn't clear which NLP scenario was used to obtain the council's final figures but on it's own such an error would amount to over 1000 dwellings over-estimated on the Local plan figure of 6250 dwellings.

These migrations are actual figures whereas the NLP report appears to be using older Sub-National Population Projection figures which already are shown to have considerable error.

LIVE BIRTHS AND DEATHS

<i>Year</i>	<i>Births</i>	<i>Deaths</i>	<i>Nett movement</i>
2013 (mid-year est.)	974	587	+ 387
2012	996	610	+ 386
2011	984	539	+ 445
2010	1028	548	+ 480
2009	1029	542	+ 487
2008	1040	562	+ 478
2007	1015	552	+ 463
2006	908	577	+ 331
2005	885	542	+ 343
2004	973	549	+ 424
(Average)	(983)	(561)	(+ 422)

With an average nett population increase of births over deaths of just 422 per year it can be seen that even small movements in migration will create significant differences in population forecasts and therefore housing needs forecasts.

More recent ONS information confirms the decrease in live births and the lower nett figures.

Tamworth has an aging population. Therefore deaths will accelerate and births will decrease. NLP factors an extra 221 or so deaths per year by 2031 which seems reasonable. But it also factors in a much smaller decrease for births of about 70. This would not be realistic unless assumptions about younger people moving (or not moving?) into the town to replace the aging population were made. As things stand in Tamworth it is the younger people who are moving out of the town. Such an assumption is not objective and makes a significant impact upwards on the assessed housing needs .

PROJECTED HOUSING NEEDS USING THESE FIGURES

Taking these raw averages produced 422 population increase less 330 negative outward migration = 92 / year
Giving a population increase over the plan period 2006 – 2031 = 2300

At current values of 2.43 persons per household (or headships as NLP uses) equates to only **946 extra dwellings** needed over the Plan Period - a basic housing need figure. 5304 dwellings less than the Local Plan is calling for. **Just 38 new homes per year. As opposed to the NLP and the Council's claimed 250 dwellings per year.**

But that is just a basic projection. There are a number of trends, reasonable assumptions and allowances that need to be built in to the figures.

1. **Headship** (ie persons per household). At present (2011 census) this is 2.43 persons per household. In 2001 census it was 2.53. Therefore there has been fall between 2001 & 2011 (levelling off in the later of that period - see graph p20 NLP 2014 report). Reasonably NLP argues that an aging population give less people per household. But whether such a steep fall between 2001 - 11 should continue post 2021 is very dubious. Economic factors, particularly affordability, will increase persons per household as well drive outward migration. According to NLP Tamworth has the highest rents in Staffordshire and one of the highest rates of inflation in housing (albeit from a low base). These too must be taken into account. From the NLP graph they deduce a 2031 figure of 2.32 people per household - and then **apply that to the entire Tamworth housing stock.** Even if we accept some downward trend is right, the projection from 2021 should follow the 2011 based projections, not the flawed 2008 ones (NLP p20 - 2.78), making the value to be used 2.36. This small but significant adjustment in itself would amount to approximately 600 less dwellings needed from the Local Plan figures of 6,250. Or another **37** dwellings added to the above **38** housing needs figure (75 so far in total)

2. **Trends.** If employment picks up in the town then it is reasonable to expect migration flows to even out again. However, there is little sign of this happening. Nevertheless a housing needs assessment also needs to aspire to a better quality of life for residents so some allowance can be included for a more optimistic economic forecast. In it's Experian scenario NLP goes wildly over the top with job prospects (and no job losses!) but then admits this when dismissing it. It dismisses with equal contempt the "trends" (note - not averages) scenario where (-) 17 houses are year would (technically) be knocked down!! Trying to make out some sort of "balanced attitude". But at least the "Past Trends Jobs Growth" scenario is based on what had actually been happening (and shows the seriousness of Tamworth economic situation) and therefore has some use and justification, unlike the Experian scenario - although this NLP report dismisses both with equal contempt as if they were both similarly flawed.

3. **NLP Figures Graph.**
 - a) Attached is a graph indicating population and household projection side by side. You can see by the time it gets to 2021 for every single person there is an extra dwelling. That cannot be right. The figures are also not completely up to date and indicated on the graph is also the latest population increase for 2013 - a mere 39 - 241 less than the projected figure NLP have projected. ***If this continues NLP's projected population figures will become a nonsense.***
 - b) Also - if actual headship rates for each year were shown on NLP's graph, instead of an averaged out line, it would show a steep fall between 2001 and 2007 - after which it substantially levels out. They are assuming the steep fall trend will continue at the 2008 level and they apply that 2008 rate continuously after 2021. This must be nonsense.
 - c) There is I believe, a reason for those earlier headship declines. I was on the Tamworth planning committee during those years. It seemed to me that everything we were building seemed to be blocks of flats. Pennymoore Road, Glascote Road, Rosy Cross, Victoria Road - 100s of them - and not a lot else. That in itself, with only one or two occupants to each flat would significantly reduce the headship rate. It wasn't a normal circumstance and it should not be projected across the Plan period as if it were a trend that was likely to continue. If the figures from 2008 on were used (2.43 people per dwelling) then the rate would flat-line and (far from 2.32 and less!) would not even get under 2.41. Maybe a slightly lower figure allowing for catch-up? But with each 0.01 fall accounting for around 320 extra homes needed across the borough you can see this becomes very important to get as right as possible. There are circumstances of austerity, and the bedroom tax

possibly, that if factored in may even raise the projected headship figure!

- d) NLP are consultants and give expert advice on planning applications and at appeals for all the large developers across the country. They would naturally want to be optimistic. It is indicative that there have been two updates to the original reports now - in response to two updates on figures, both showing less need for housing - and yet the original Local Plan housing need figure has been kept exactly as it is - 250 per year - and under recommendation from NLP too! A Local Plan with dwelling overproduction planned into it is far easier for developers to work with. NLP contracts to Councils too, who would also want high rates of growth to accumulate more council taxpayers and New Homes bonus or similar government incentive. *NLP runs with the hare and the hounds on this.* Without suggesting anything untoward, this does in my view represent a conflict of interest.
- e) What seems to have been happening is that NLP (and the Council?) have been playing with figures, assumptions, trends and guesses input into the POPGROUP programme and seeing what comes out and keeping the figures as high as they could.

But in a town like Tamworth, already the densest conurbation in Staffordshire, such increases will put further pressures on community facilities. Additionally it would give developers the chance to build almost where they want, greenfield spaces first, because the Council will constantly be failing to achieve target housing and will always be under pressure to give up greenfield sites when other brownfield sites are available. *This is not fair on local people.*

4. This all suggests a much lower housing needs figure. Probably about **120 dpa (3000 over the plan period)** taking into account allowances and contingencies. This would also conform to the now defunct West Midlands Regional Spatial Strategy that gave Tamworth 2,900 (116 dpa) as their calculated figure. That's a lot less than the 6250 now being used in the Draft Plan.

5. These in my view are the more serious miscalculations. There are others that always seem to be giving housing needs on the high side. I believe this shows sufficiently cause to question the soundness of these housing needs figures and to review the Housing Needs Data, especially with the benefit of the more up to date figures that are available.

6. Other Issues.

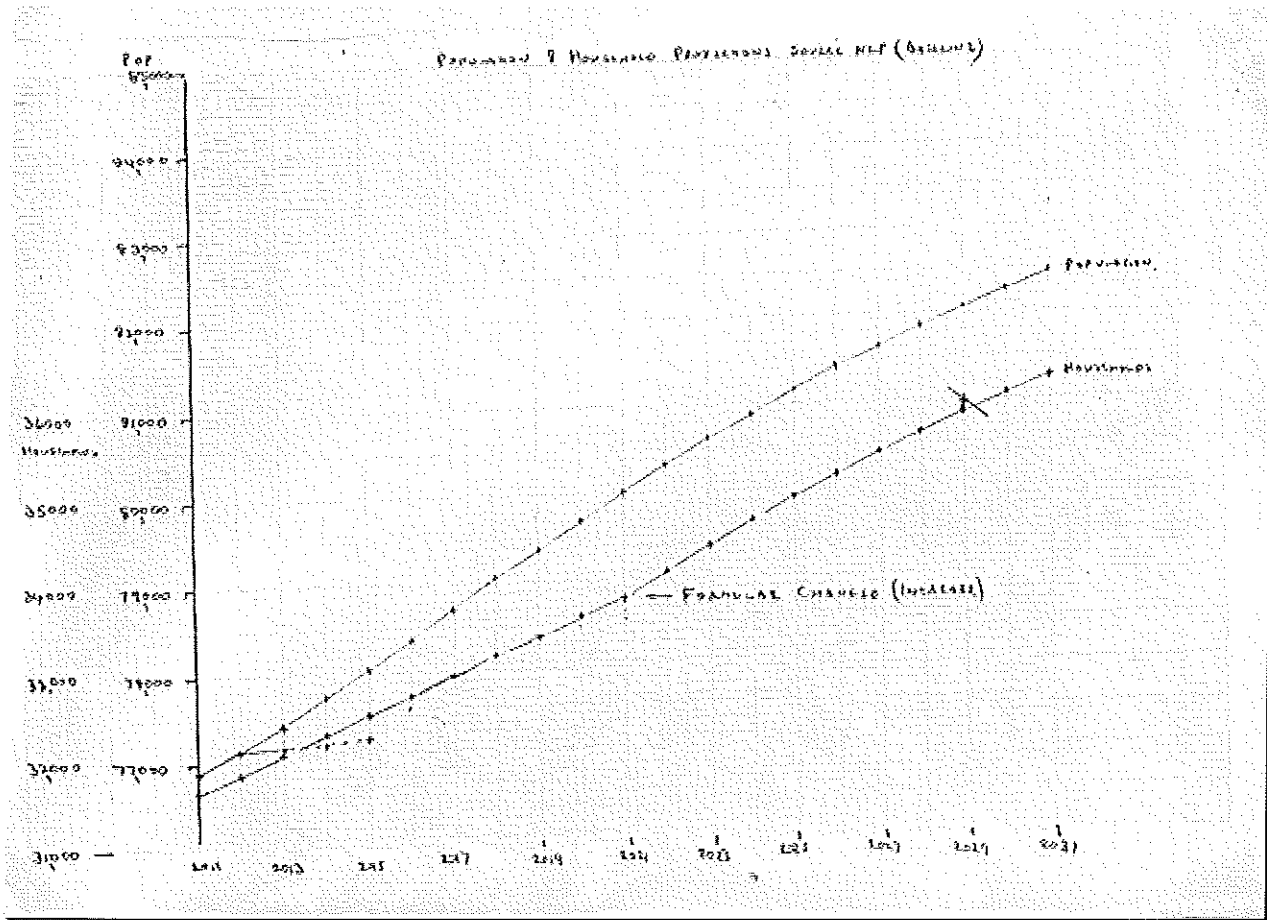
a) (Under Theme 1 - Possibly 5.1?) "Garden grabbing". Recently Tamworth Council lost a planning appeal where the Inspector pointed out that the Council had no policy regarding private garden development. NPPF sect. 53 says councils "should consider the case for setting out policies to resist inappropriate development of residential gardens". I do not see that Tamworth Council has done this nor is it shown in the draft Local Plan. This leaves the authority open to further such development without any policy that might guide or resist such applications.

b) (under Theme 1 - 4.13) Affordable housing. - I understand there is an affordable housing need in Tamworth of 183 dwellings per year. I can't see how that figure was reached - perhaps on the basis of Tamworth's housing register? These are in any case not deliverable. Council home / social housing building would meet some of this need and currently some council garage sites are being developed meeting 100% affordable needs. Recently the Council has obtained £21 in Government debt and instead of developing all new homes has decided instead to use the money to knock down older stock and rebuild approximately the same number. Besides wasting a huge amount of money it has been a missed opportunity to provide more social housing. The council must understand that if more affordable homes are to be built then the council itself has a responsibility and should have policy to reflect this. I see no such policy in this Local Plan.

c) (Theme 1 - 9.1, 9.2 & 9.3 - SUEs) - Reverting back to overall housing needs. If as is demonstrated here, that the housing needs figures are indeed inflated by 100% that would equate to about 3000 dwellings. It would mean that these three SUEs would not be needed. More importantly (in my view) it take the pressure off having to meet this unrealistic 250 dwelling per year. This means that the Council need not be forced to accept greenfield development simply because it was "the only game in town" and they were well behind on Local Plan targets. Of course I recognise that the financial benefits to the Council of having these three areas developed are very great. But that is no reason to skew the Plan to make it easier to accept these developments.

d) (Theme 1 - 4.2) - Duty to co-operate. Even if the housing needs figure was to be substantially reduced the need for other local authorities to assist Tamworth would still remain high. It should be seen as an opportunity to save some of Tamworth's threatened green space and deliver housing needs just outside the borough. I'm sure the other local authorities are keen to support this. The problem may arise that Tamworth Council would not want, for their own financial reasons, to lose any more new build housing than possible to their local authority neighbours.

Graph of NLP's Population against Household Projections = Each 1 population addition to each 1 new dwelling



----- submission ends -----

