

**Anca Seaton**

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**From:** Keith Kondakor [REDACTED]  
**Sent:** 16 October 2023 18:48  
**To:** Planning Policy  
**Subject:** Fwd: Borough Plan response to HEDNA  
**Attachments:** kk\_reply form and HEDNA.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Processed

please resubmit this from 2022

----- Forwarded Message -----

**Subject:** Borough Plan response to HEDNA

**Date:** Fri, 22 Jul 2022 16:46:46 +0100

**From:** Keith Kondakor [REDACTED]

**To:** Planning Policy [REDACTED]


**CC:** KONDAKOR Keith [REDACTED]

[REDACTED], BALDWIN  
Ashley [REDACTED]

The borough plan 2024 to to 2039 target should be 350PA.

See attached cross cutting response to HEDNA

Keith

 <p><b>Nuneaton &amp; Bedworth</b> United to Achieve</p>	<p><b>Borough Plan Review Preferred Options consultation draft</b> Response Form</p>	<p><b>Ref:</b></p> <p>(For official use only)</p>
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Please return to Nuneaton and Bedworth Borough Council by 22<sup>nd</sup> July 2022  
via:

Email: [planning.policy@nuneatonandbedworth.gov.uk](mailto:planning.policy@nuneatonandbedworth.gov.uk) or

Post: Town Hall, Coton Road, Nuneaton, CV11 5AA.

#### Data Protection

We will treat your data in accordance with our Privacy Notice:

[www.nuneatonandbedworth.gov.uk/info/21004/access\\_to\\_information/410/privacy\\_notice/7](http://www.nuneatonandbedworth.gov.uk/info/21004/access_to_information/410/privacy_notice/7).

Information will be used by Nuneaton and Bedworth Borough Council solely in relation to the Borough Plan review. Please note that all responses will be available for public inspection, and cannot be treated as confidential. Representations, including names, may be published on our website. By submitting this response form you are agreeing to these conditions. The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to join the Planning Policy consultation database?

Yes

This form has two parts –

Part A – Personal details

Part B – Your response.

#### Part A

	<b>1. Personal details*</b> * If an agent is appointed, please complete only the title, name and organisation boxes below but complete the full contact details of the agent in 2.	<b>2. Agent's details (if applicable)</b>
Title	<b>Cllr</b>	
First name	<b>Keith</b>	
Last name	<b>Kondakor</b>	
Job title (where relevant)		
Organisation (where relevant)		
House no. and street		
Town		

Post code	[Redacted]	
Telephone number		
Email address		

**3. How did you find out about this consultation? (please mark each box with an 'X' next to all answers that apply)**

Community Forum notification	
Notification directly from the Council's Planning Policy team	
Nuneaton and Bedworth Borough Council website	
Nuneaton News (paper)	
Nuneaton News (website)	
Twitter/Facebook	
Other – please specify: councillor	

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**Part B - Please use a separate sheet for each representation**

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Name or Organisation:

4. To which part of the Borough Plan Review Preferred Options document does this response relate?

Paragraph	7.25 – 7.26
Policy	
Evidence base documentation (if applicable)	HEDNA

5. Please outline your response in the box below. It would be particularly helpful if you can say whether you consider the Borough Plan Review Preferred Options document to be 'sound' (as set out in the 2021 National Planning Policy Framework, [which can be found at https://www.gov.uk/government/publications/national-planning-policy-framework--2](https://www.gov.uk/government/publications/national-planning-policy-framework--2)) i.e. whether the plan is positively prepared, justified, effective and consistent with national policy. Similarly, if you believe that the plan does not meet legal requirements, please set out the reasoning below.

## **Note on HENDA and Housing Target**

This is my initial response to the May 2022 Nuneaton & Bedworth Housing & Economic Development Needs Assessment. I have asked NBBC for the data which supports the assessment but the council has failed to provide the data behind the age profile and headship calculation. The NBBC

HEDNA report therefore should be given no weight until this information is available.

It is also essential to recognise that a housing need assessment for our borough needs to understand what has happen in the housing market area since 2011 and the economic imbalance between the North and South of the Coventry and Warwickshire sub-region. Nuneaton and Bedworth has suffered primarily from low household incomes and lower opportunities. Most of the population growth has come from inward internal migration.

### **Detailed comments** (by HEDNA section number)

1.4 The functional Housing Market Area (HMA) and Functional Economic Market Area (FEMA) for Nuneaton and Bedworth should include Hinckley, Coventry and North Warwickshire but exclude Stratford-on-Avon. There is a massive interaction between growth in Hinckley and Nuneaton.

2.19 “The earnings of those working in the Borough fall 23% below the sub-regional average”, The rest of the report ignores this.

4.2 “house prices in Nuneaton and Bedworth are around one third lower than the wider HMA”. This is key detail. High quality house building will focus on areas with higher house prices. Plans for higher targets are only viable if some of the infrastructure and affordable housing can be funded properly externally.

### 5 Demographic trends.

The 2021 early release shows that the population of Coventry has been significantly over estimated by around 40,000 people. There has been a smaller over-estimate of populations in Warwickshire of around 8,600. For the Coventry and Warwickshire Housing market area the Mid-year population estimate will have been around 31,000 too high by 2021.

It was clear as far back as 2013 that the population forecasts were deeply flawed as they did not take account of the growth of student numbers around Coventry and displacement of people into Warwickshire. I have made this case in all the consultations and hearings for both our borough plan and that in Coventry. More recently we have had a vast array of diverse data showing the significant error in the Population of Coventry in the 25-34 year age range such as birth rates and vaccination take-up. My research was key in challenging the ONS mid year estimates for Coventry and the review of their work by the statistics regulator in 2021.

### 5.3 Age profile.

The census shows we have 19.0% of borough population under 16 years old and 19.1% over 64.

### 5.4 ONS Mid-Year Estimates (were wrong)

The change in population between census in the borough has been approximately 8,791 people which is a 7.0% increase. I estimate there have been around 15,611 births and 12,456 deaths in the 10 years implying a net natural change of around 3,155 and in implied net migration into the borough of 5,636 people. The population change in Coventry was 8.9% and overall Warwickshire

change was 9.4% lead by Rugby which rose by 14.4%. (note all these estimates will be improved when census data is released without rounding to nearest 100 and birth/death data releases aligned with timing of census)

## 5.5 Accuracy of Population Estimates and Relationship with Coventry

I have attached my slide pack for my Statistics Authority presentation. I and other campaigners have been demonstrated to be correct by the new census data. Remarkably a population estimate based on facebook users was more accurate than ONS MYE.

## 5.8 Migration within region.

The big growth area was Rugby which had more affordable housing and better rail services to London.

## 5.10 growth in housing.

The borough population grew 7.0% between censuses while number of households grew by 7.3%. The number of dwellings increased by 8%. The accelerated rate of housebuilding is reducing the number of suppressed households but increasing the number of empty homes since 2006.

## Projected Population Growth

Over the decade 2011-2021 the population of the Borough grew by around 8,791 people (7%). Over that period we have increased the number of households by 7.3% and number of dwellings by 8% (just under 4000).

I have created a crude black box model of the borough's male and female population to enable the population changes from 2011-2021 to be rolled forward to 2031 and beyond. The input data for changes over the decade clearly have considerable limitations due to the rounding of totals (to 100s) and the lack of single year age totals. It is also obvious that 2021 was not a typical year due to impact of the pandemic both suppressing birth rate and reducing the number of students physically being at university addresses.

My model takes the 2021 census population in 5 year age bands by sex and produces an estimated single year age band population aligned with single year age profile in Nuneaton and Bedworth PCN GP registrations. The model uses real birth and mortality data plus a modelled migration rate per age to roll forward the 2011 census profile to a modelled 2021 population for each sex. The modelling of deaths is also only a crude approximation as data is mostly available in 5 year bands. We have the added issue of 2011 census having a 85+ age band to roll forward into 95+ band in 2021. I based death rates in model on 2016-20 mortality data in the 5 year age bands which includes around 9 months of the pandemic in the 10 year trend. The Microsoft excel solver function is then used to fine tune the migration coefficients to produce the minimum square error. This crude model cannot produce a perfect single year match. In real world the migration rate varies between years for each age and some of the inputs are in 5 year age bands or misaligned by 3-9 months. However it is good enough to drive a model of birth rates and household headship numbers. In rolling the model forward from 2021 census year to 2041 the single year migration coefficients are fixed, birth rates are fixed at average birth rate in 5 year band for 2013-2019 and the fixed death rate. Figures 4 & 5 shows the modelled and census populations at 2021 in very good agreement. Figures 6 & 7 shows the 2021 census populations rolled forward to 2031.

When we get single year data from the full census release we can better represent populations in the under than one year and 95+bands. That will have only tiny impact on housing requirements for 2021 to 2031.

The model forecasts a population increase of 6,611 people between 2021 and 2031. Between 2031 and 2041 the increase is predicted to be 4,818 as the number of people sadly dying increases as post war population ages.

I then convert the population back into 5 year age bands and use ONS 2018 based headship rates to calculate expected number of households for each year. For 2021 that calculation gives 58,116 households compared to the census which gives 56,600. Part of the 1,516 difference will be due to around 900 people (source ONS: Care homes and estimating the self-funding population, England: 2021 to 2022) being in institutional settings who should not be included in headship calculation and the rest could be additional suppressed households given low incomes. Applying ONS 2018 based headship rate for 2031 gives us 61,615 households which is an increase of 3,499 extra households over 10 years. Rolling onto 2041 we get another 2,650 households as rate of population growth reduces. Over the proposed period of the plan 2024-39 the number of households increases by 4,467 which is 298 per year. We are currently building around 600 homes a year which will slow down as the backlog of building s and help to buy is cleared. I would propose the base level of long term housing demand is set at 298 a year with addition small provision made to reduce suppressed household creation. A rough borough plan target proposal assuming we build 600 a year 2022-2024 is to have 400 target for 2024-29, 350 for 2029-2034 and 300 target 2034-39 giving 1,800 homes before plan starts and then 5,250 over 15 years (see figure 9). That would over provide by 1,500 to assist with suppressed household formation.

Cllr Keith Kondakor

22<sup>nd</sup> July 2022



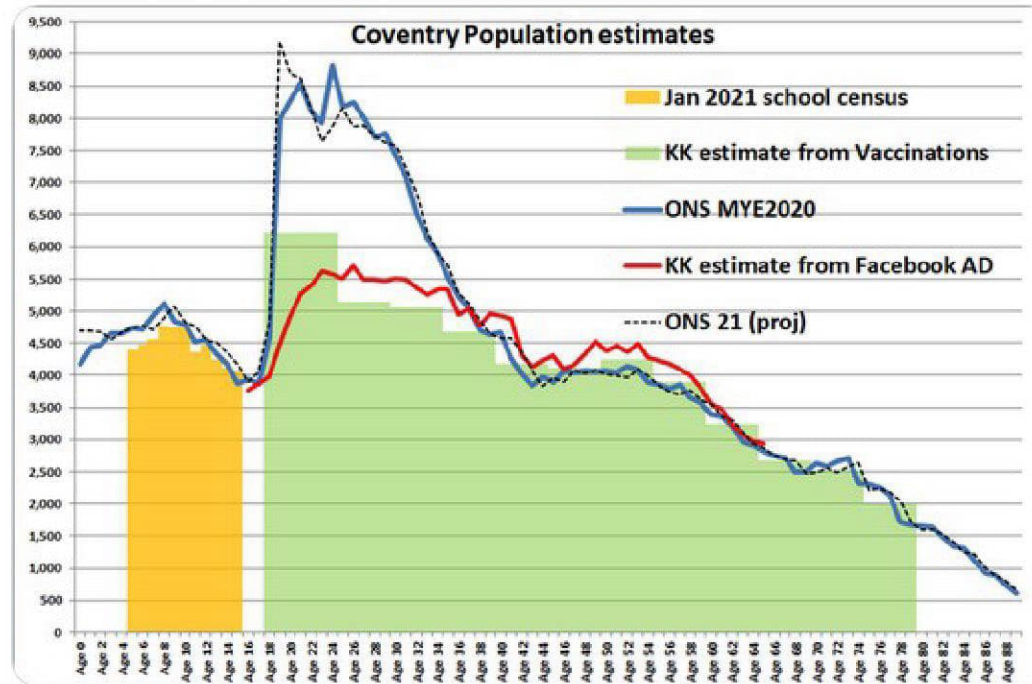
Area name	All persons	MYE 2019	MYE2020	extrap	error
Hinckley and Bosworth	113,600	113,136	113,666	114,064	-464
<b>West Midlands</b>	5,950,800	5,934,037	5,961,929	5,982,848	-32,048
Warwickshire	596,800	577,933	583,786	588,176	8,624
North Warwickshire	65,000	65,264	65,452	65,593	-593
<b>Nuneaton and Bedworth</b>	<b>134,200</b>	<b>129,883</b>	<b>130,373</b>	<b>130,741</b>	<b>3,460</b>
Rugby	114,400	108,935	110,650	111,936	2,464
Stratford-on-Avon	134,700	130,098	132,402	134,130	570
Warwick	148,500	143,753	144,909	145,776	2,724
West Midlands (Met County)	2,919,600	2,928,592	2,939,927	2,948,428	-28,828
Coventry	345,300	371,521	379,387	385,287	-39,987

Figure 1 – 2021 census, Mid year estimates for 2019,2020, (source ONS) MYE extrapolation to March 2021 and error at March 2021



Keith Kondakor,

I estimate the standard 2021 mid-year population of Coventry is around 345,000 people (CI 330,000-370,000). Official @ONS 2020 MYE was 379,387 & their projected 2021 population was 383,820. The city now has 38000 less than projected. @BBCCWR @CPRE @live\_coventry @covobservernews



2:39 PM · Aug 19, 2021 · Twitter Web App

Figure 2 – My April 2021 estimate of Coventry population which was only out by 300 from 2021 census.

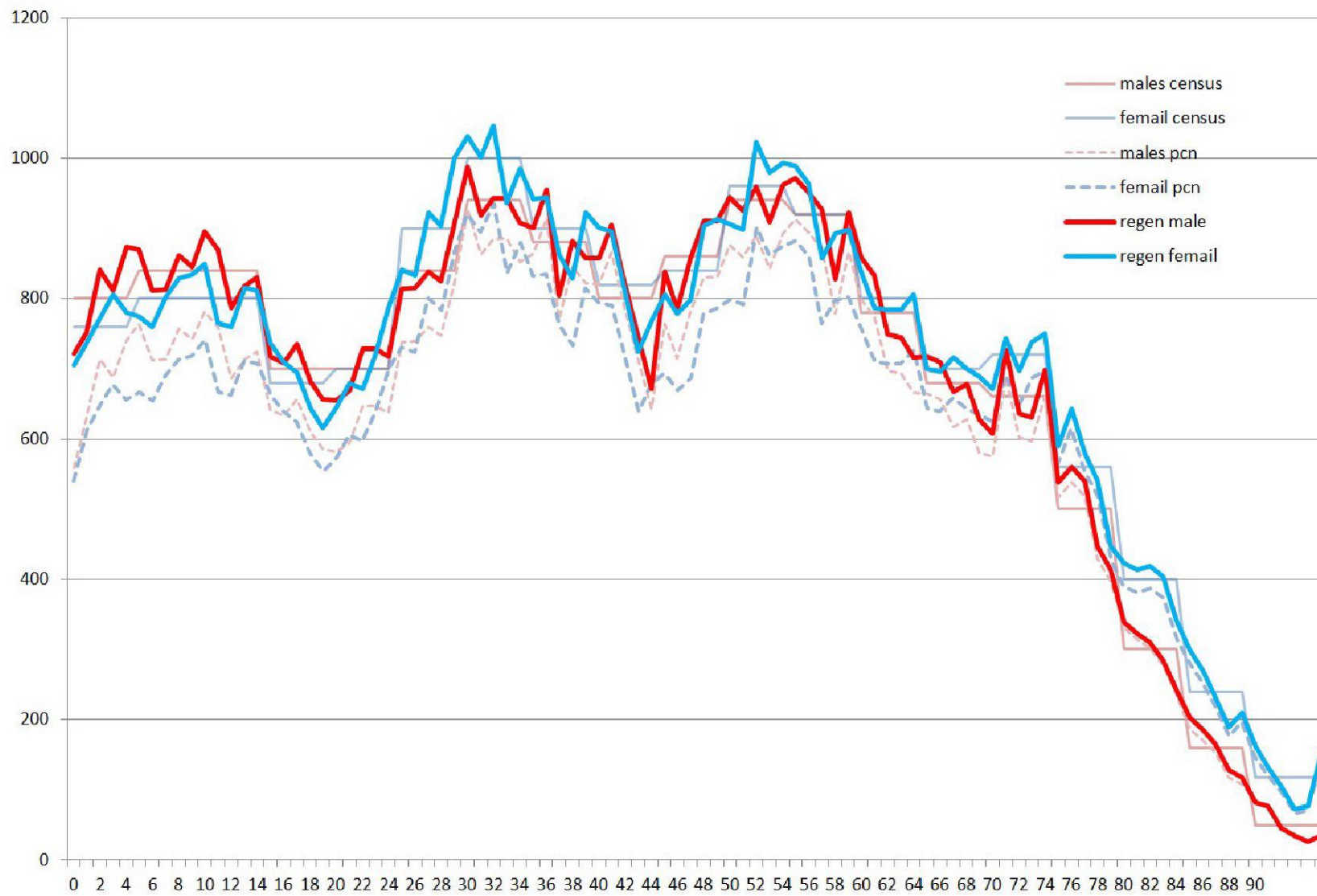


Figure 3 generating single year 2021 population from 5 year band census data and PCN GP registrations.

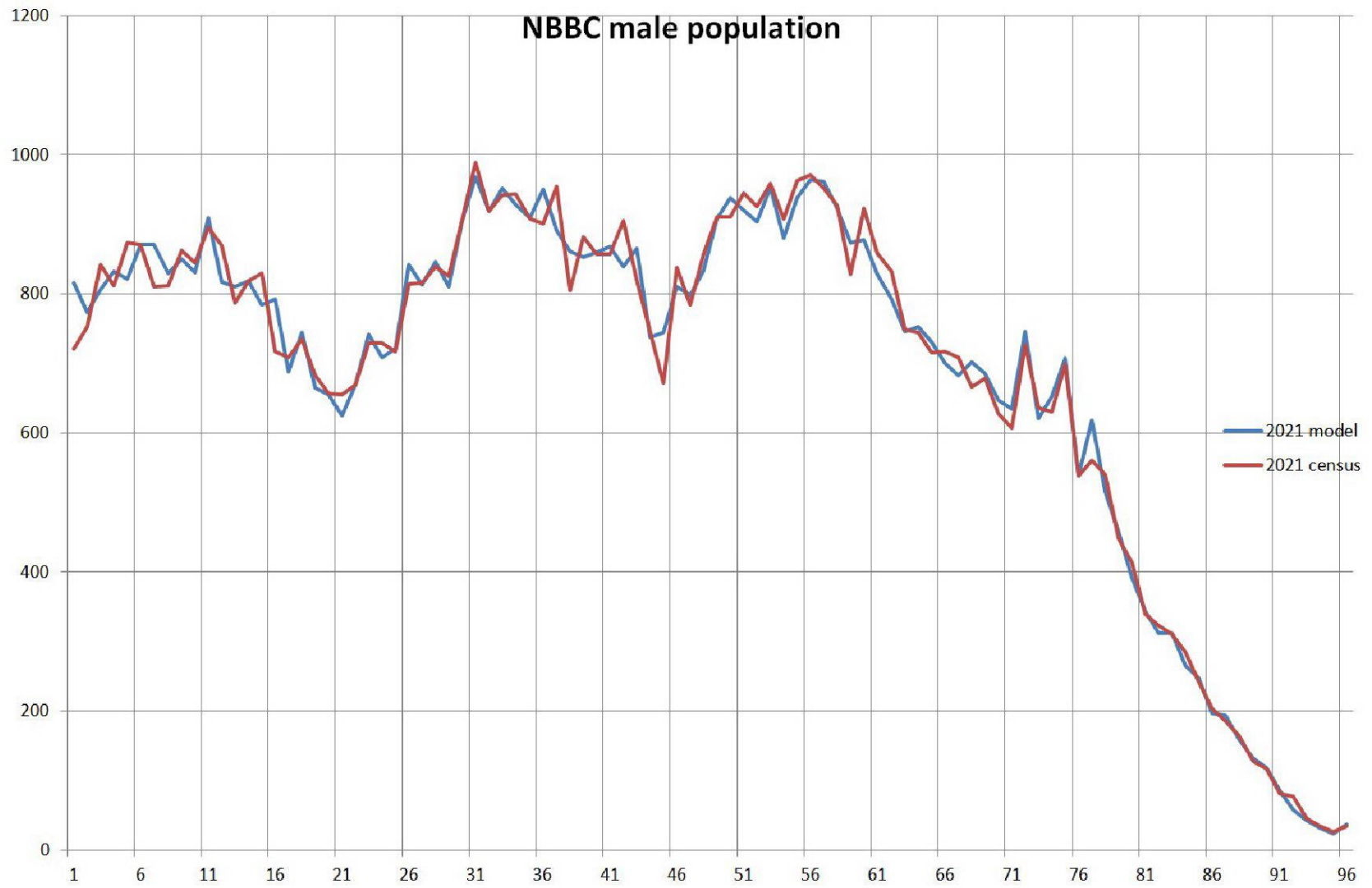


Figure 4 - Model output of 2021 male population and single year population created from 2021 census data.

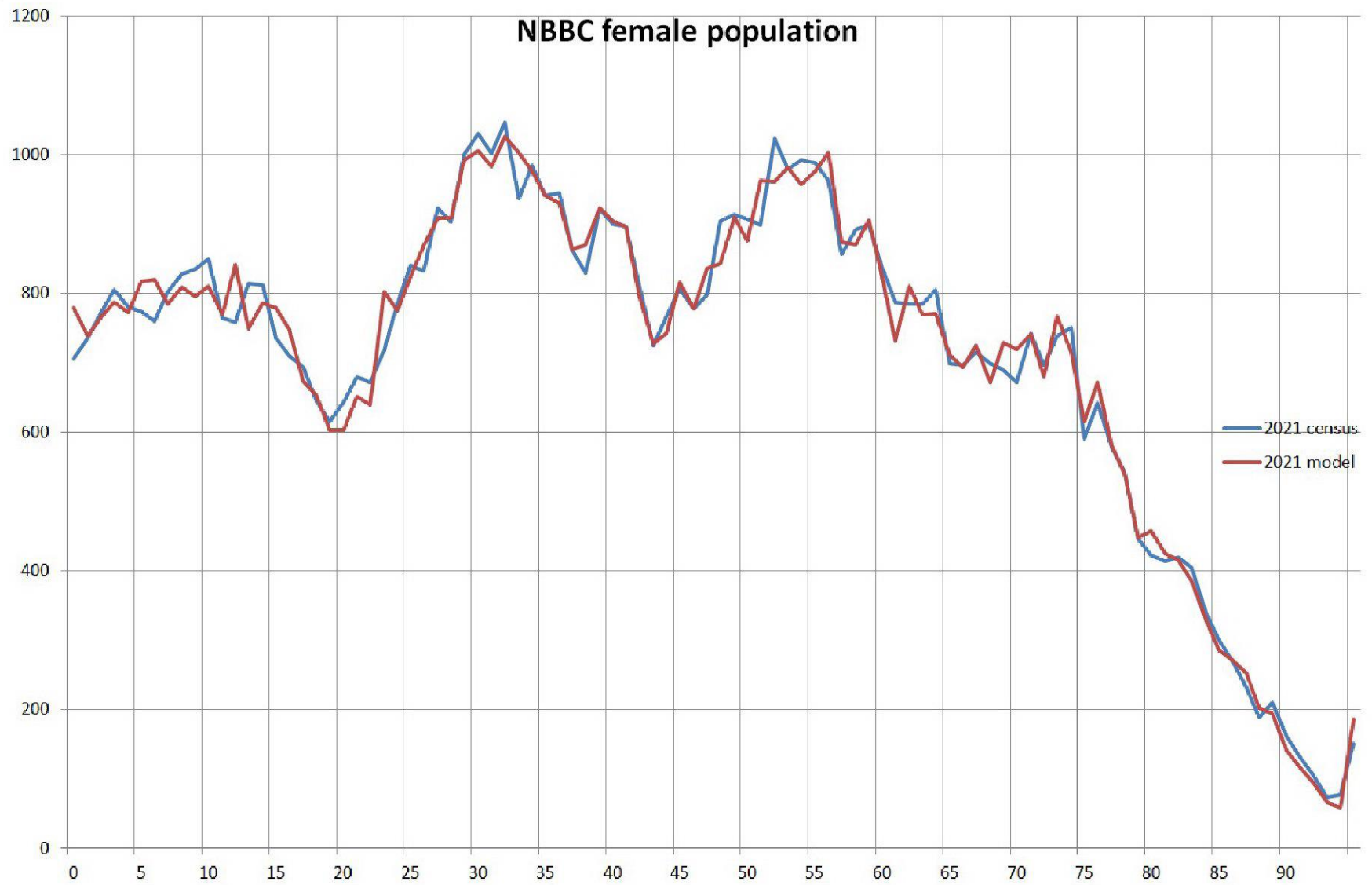


Figure 5 - Model output of 2021 female population and single year population created from 2021 census data

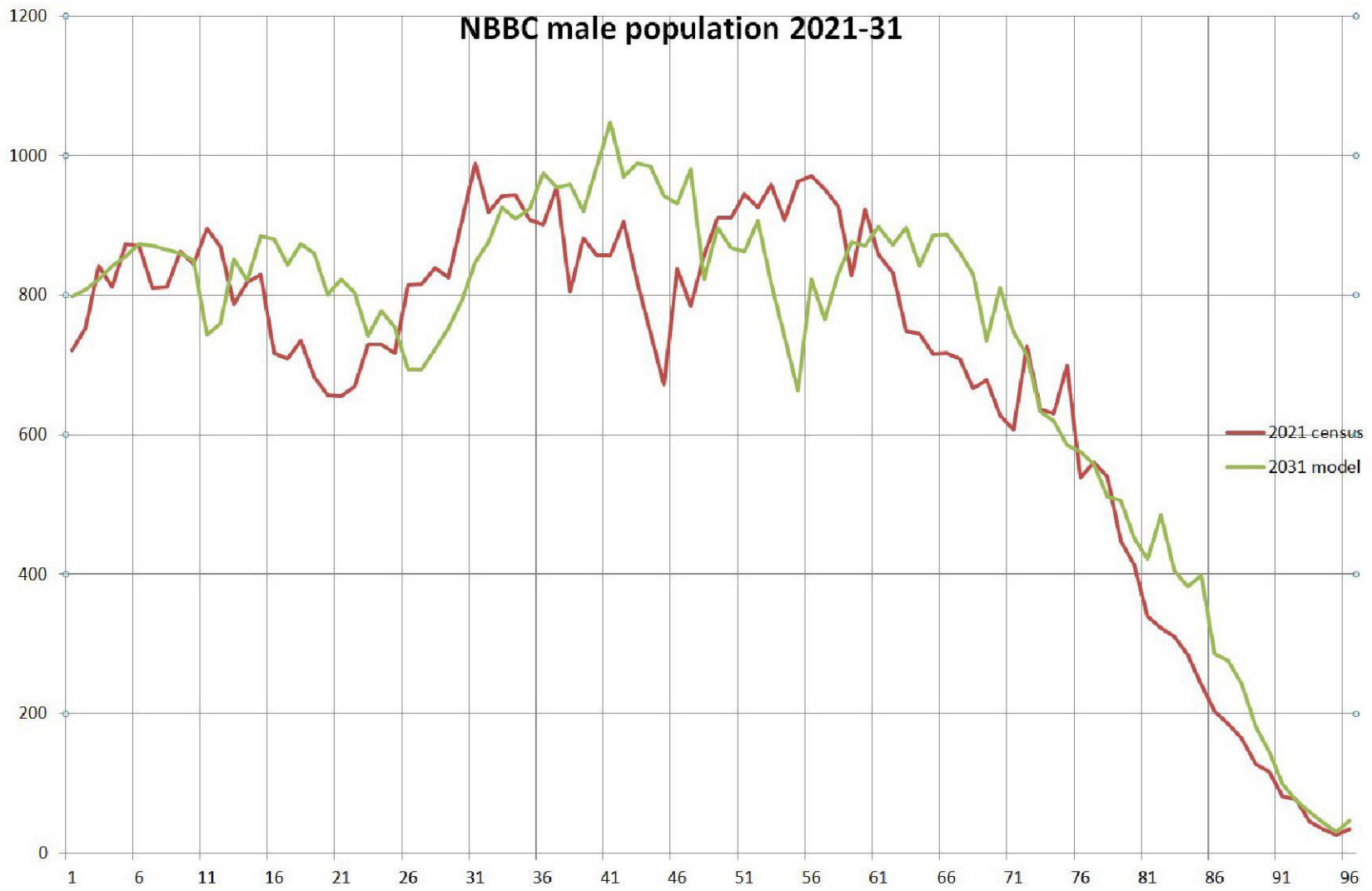


Figure 6 - Model output of 2031 male population and single year population created from 2021 census data

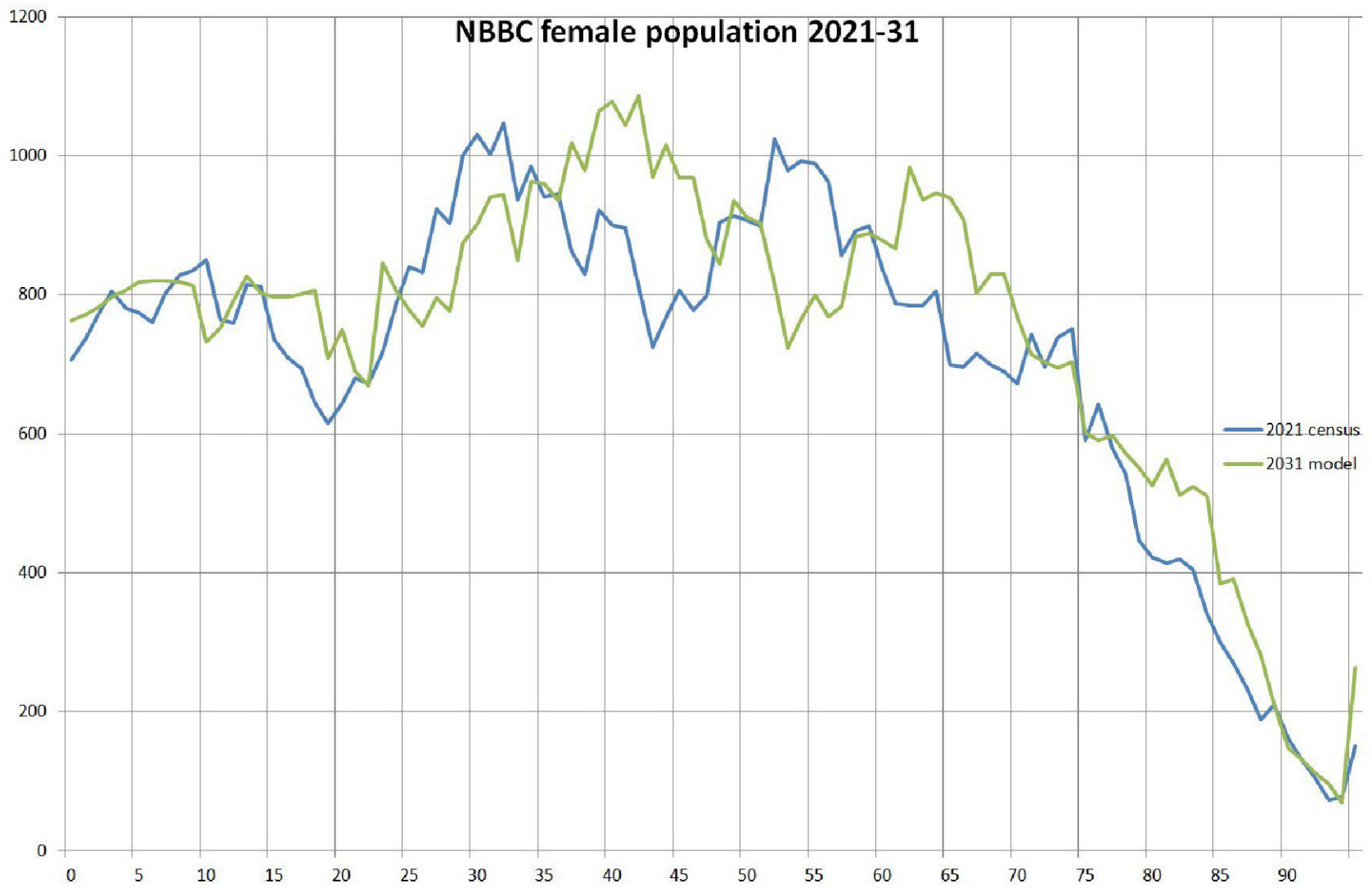


Figure 7 - Model output of 2031 female population and single year population created from 2021 census data

census	2011	61,441	63,811	125,252
model from 2011	2012	61,995	64,227	126,222
model from 2011	2013	62,533	64,631	127,164
model from 2011	2014	63,013	65,078	128,091
model from 2011	2015	63,500	65,571	129,071
model from 2011	2016	63,972	66,059	130,031
model from 2011	2017	64,391	66,502	130,892
model from 2011	2018	64,811	66,958	131,768
model from 2011	2019	65,212	67,380	132,592
model from 2011	2020	65,583	67,776	133,359
model from 2011	2021	66,004	68,203	134,207
census	2021	66,000	68,200	134,200
model from 2021	2022	66,403	68,631	135,035
model from 2021	2023	66,798	69,043	135,841
model from 2021	2024	67,183	69,436	136,619
model from 2021	2025	67,537	69,806	137,343
model from 2021	2026	67,864	70,141	138,005
model from 2021	2027	68,172	70,470	138,642
model from 2021	2028	68,456	70,775	139,231
model from 2021	2029	68,716	71,067	139,784
model from 2021	2030	68,960	71,347	140,307
model from 2021	2031	69,188	71,623	140,811
model from 2021	2032	69,421	71,890	141,311
model from 2021	2033	69,657	72,155	141,812
model from 2021	2034	69,881	72,427	142,308
model from 2021	2035	70,101	72,679	142,780
model from 2021	2036	70,326	72,935	143,261
model from 2021	2037	70,543	73,173	143,716
model from 2021	2038	70,776	73,417	144,193
model from 2021	2039	71,017	73,664	144,681
model from 2021	2040	71,251	73,908	145,159
model from 2021	2041	71,480	74,149	145,629

Figure 8 Keith's crude population model 2012-21 and 2022-41 plus 2011 & 2021 census



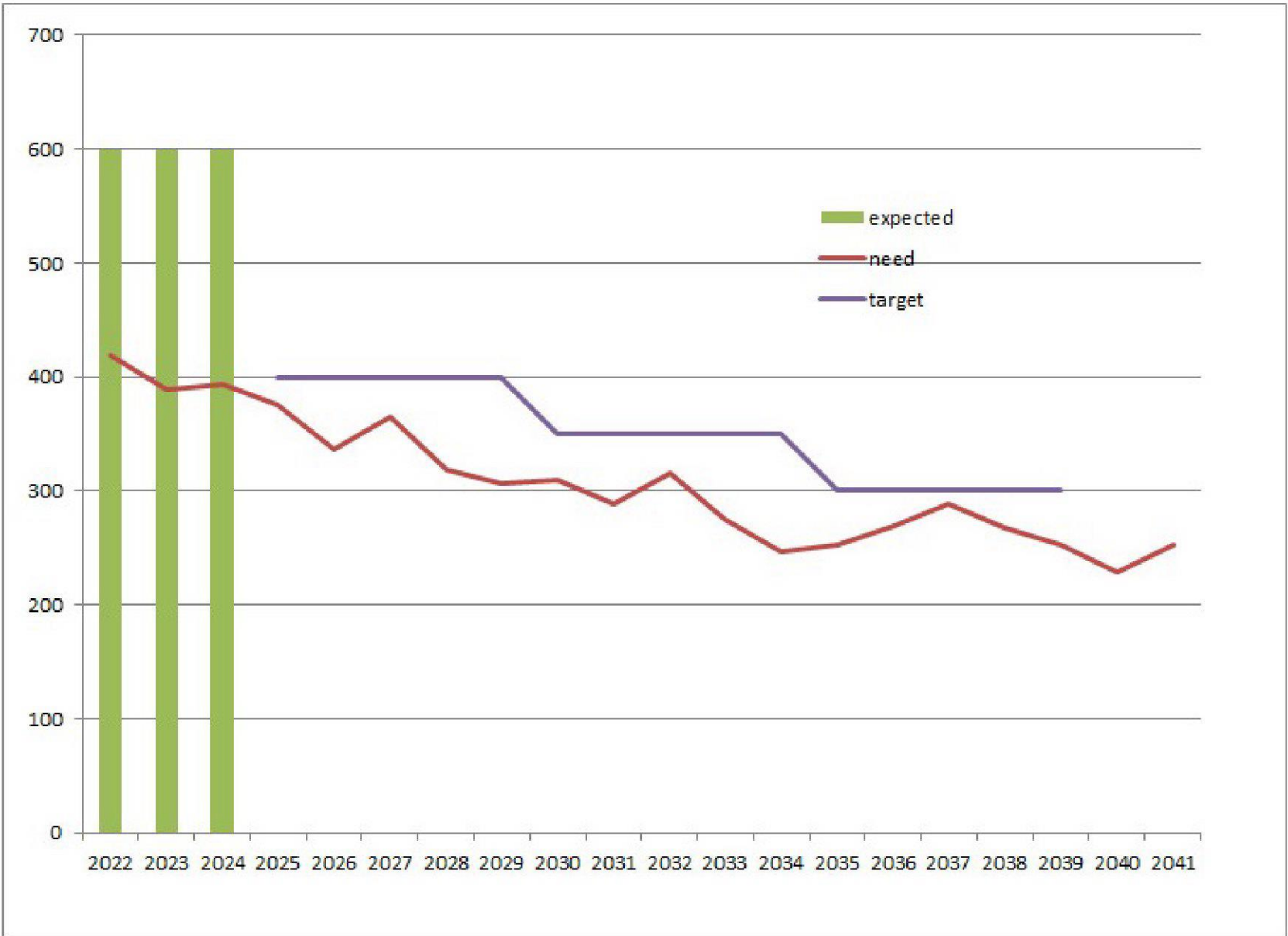


Figure 9 – Future additional households based on ONS 2018 headship rates plus possible housing target.