

Matter 3 Hearing Statement – Housing Land Supply - Strategic Overview

Our ref 04916/02/JG/JCx
Date 17 August 2017

Subject **Nuneaton & Bedworth Local Plan Examination – Matter 3 Hearing Statement on behalf of Prologis UK Ltd.**

1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Lichfields on behalf of Prologis UK Limited (“Prologis”) and responds to the questions set by the Inspector in relation to Matter 3.
- 1.2 This Hearing Statement should be read in conjunction with our representations submitted during the Local Plan Consultation (2017) on behalf of Prologis (comment reference number 2.0023.1).

2.0 Issue 3.1 Identifying the supply

Have the strategic and non-strategic housing allocations included in the plan been chosen on the basis of a robust and objective site-selection process?

- 2.1 Yes. Throughout the preparation of the Local Plan, the accompanying Sustainability Appraisal has continued to assess the potential impacts of the identified strategic and non-strategic housing allocations against a range of clearly defined sustainability objectives.
- 2.2 As part of this process, the Sustainability Appraisal has considered alternative sites and strategies (also taking into account any potential scope for mitigation measures to be adopted), using a scoring mechanism in order to consider different sites against individual sustainability objectives in a consistent manner. This approach is considered to be entirely appropriate and one which has commonly been used by other Local Planning Authorities in the production of plans that have subsequently been identified as sound at Examination.
- 2.3 Certainly with regard to Prologis’ land interest at Site HSG1, the Sustainability Appraisal provides a fair assessment of the strategic site’s attributes and is generally consistent with the technical evidence that has been submitted on our client’s behalf as part of earlier representations. This provides further verification as to the robustness of the site selection methodology.
- 2.4 On the basis of the above, the Plan is considered to have taken forward the most appropriate strategic and non-strategic housing allocations, based on a robust and objective site-selection process.

Has the approach to selecting allocations made effective use of brownfield land?

- 2.5 Yes. At all stages, the development strategy for the emerging Local Plan has sought to include the development of brownfield land as a priority. However, the Local Plan also accepts that there is insufficient brownfield land available in the Borough to accommodate the identified

housing needs in full. It accepts, therefore, that it is necessary to identify housing allocations on greenfield land too.

Is the inclusion of a windfall allowance of 11 dwellings per year from 2020 to 2031 justified and consistent with national policy?

2.6 Prologis has no comment as to the proposed inclusion of a windfall allowance.

The Environment Agency point to the need for an updated Strategic Flood Risk Assessment (SFRA) and where this is not done for a cautious approach to be taken to the capacity of certain strategic and non-strategic sites [rep 3.0011]. In general terms does flood risk indicate a need for a more prudent re-assessment of the capacity for these sites?

2.7 Whilst such an approach may be prudent for sites where flood risk concerns affect large swathes of a particular site, we would emphasise that a re-assessment should not be applied to all strategic and non-strategic sites across the board.

2.8 In the case of Site HSG1, a site-specific Flood Risk Assessment has been undertaken in respect of the land that falls within Prologis' ownership and has been submitted as part of a detailed planning application for 494 dwellings and associated infrastructure (ref. 034076) in respect of the same site. Detailed flood modelling has been undertaken in support of this application, with the accompanying Flood Risk Assessment confirming that all residential properties can be located within Flood Zone 1, where they would not be at risk from flooding.

Is there a robust assessment of the deliverable housing land supply and the medium to long term developable housing land supply?

2.9 Yes. The 2016 Strategic Housing Land Availability Assessment ("SHLAA") identifies the availability of deliverable and developable sites using a robust methodology which applies a consistent set of criteria against identified sites, including those with planning permission.

2.10 For the identified deliverable and developable sites, the SHLAA also sets out the likely delivery timeframes i.e. 1-5 years (short-term), 6-10 years (medium-long term) and 11-15 years (long term). These delivery timeframes appear to reflect both the size of individual sites as well as the identification of any site-specific constraints. For example, larger sites are shown to have extended delivery timeframes, particularly where there are constraints to be overcome. This is considered realistic and reflective of the findings of recent research¹ undertaken by Lichfields which looked at the evidence on speed and rate of delivery of large-scale housing, based on a large number of sites across England and Wales (outside of London).

2.11 The SHLAA report also describes how its findings have been informed through discussions with landowners, particularly in terms of the assessment of a site's 'availability'. This has certainly been the case in respect of Site HSG1, where the Council has maintained a constant dialogue with Prologis (one of the key landowners) throughout the production of the Plan and, as appropriate, further technical and land ownership information has been provided to the Council in order to demonstrate the suitability and availability of the site for development. This is a further indicator as to the robustness of the Council's assessment of the deliverable housing land supply.

¹ *Start to Finish: How Quickly to Large-Scale Housing Sites Deliver?* (Lichfields, November 2016)