

NUNEATON AND BEDWORTH BOROUGH PLAN REVIEW – FURTHER WRITTEN STATEMENT IN RELATION TO ‘MATTERS, ISSUES AND QUESTIONS’ (MIQS)

Representations on Behalf of FCC Environment

This ‘Further Written Statement’ has been prepared on behalf of FCC Environment as part of their engagement on the Publication Draft Plan, ahead of the examination hearing sessions.

We hope that these representations are taken in the spirit they are made. The intention is to assist the Council in the preparation of a robust plan that is resistant to challenge and to support the continued allocation of land at the former Judkins Quarry (referred to as Land at Tuttle Hill (Ref: SHA3) in the Draft Plan).

Matter 2 – Vision, Strategic Objectives and Development Strategy

Issue 1: Have the vision and strategic objectives been positively prepared, are they justified and consistent with national policy, and can all be realistically achieved?

21. Are the vision and strategic objectives justified, have they been positively prepared, and do they accord with the evidence and national policy?

We are generally supportive of the vision and strategic objectives put forward in the draft Plan. However, we are concerned that the wording in relation to housing under ‘strategic objective 4’, along with the proposed housing requirement figure under Strategic Policy DS3, do not go far enough in acknowledging the scale of housing need in the Borough. We set out in detail our concerns over the housing requirement in our Regulation 19 Consultation response (under Strategic Policy DS3) and therefore will not repeat this here.

The Plan’s ‘strategic objective 4’ is to provide a “steady and adequate level of suitable housing which meets the needs of existing and new residents”. The objective of meeting the needs of existing and new residents is supported as this aligns with national policy. As stated in Section 5 of the NPPF, the overall aim should be to meet as much of an area’s identified need as possible, including with an appropriate mix of housing types for the local community.

However, the term “steady and adequate” does not sufficiently acknowledge the scale of housing need in the Borough, given the under-delivery during the current Plan period and the current shortfall in housing. We consider that this wording should be amended to ensure that the Plan can be considered to be “positively prepared”.

22. What does ‘a steady and adequate level of suitable housing’ mean in the context of strategic objective 4?

It is not clear exactly what a “steady and adequate” level of suitable housing means in the context of ‘strategic objective 4’. As discussed under question 21, it is also questioned whether this wording, along with the proposed housing requirement under Strategic Policy DS3, sufficiently acknowledges the scale of housing need in the Borough, given the persistent under-delivery during the current Plan period and significant current housing shortfall.

25. Is it necessary for the Plan to consider the release of Green Belt land to meet identified development needs?

As stated in our Regulation 19 Consultation response (under Policy SHA3 – Tuttle Hill), we continue support the Plan’s objective of bringing forward sites in sustainable locations in the main settlements and the promotion of brownfield land over greenfield and land within the Green Belt.

SHA3 Tuttle Hill is the only strategic scale brownfield site that has been put forward for allocation within the draft Plan, with all other proposals on greenfield sites. There is currently significant government support for the delivery of brownfield development with the government committing funds to enable the delivery of brownfield development across the UK.

There is other land at Judkins Quarry and in the surroundings that could potentially be more suitable than greenfield and green belt land, and it therefore represents a continued opportunity to avoid greenfield / green belt development in the future.