



Examination of the Nuneaton and Bedworth Borough Plan: Blocks 1 and 2 Hearing Sessions

Hearing Statement on Matter 3 (Housing)

On behalf of Ainscough Strategic Land Ltd

17th June 2024

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1 INTRODUCTION & CONTEXT

- 1.1 Asteer Planning LLP has been instructed by Ainscough Strategic Land (“ASL”) to prepare this Hearing Statement in relation to the Nuneaton and Bedworth Borough Plan Review (“Plan Review”) and the Matters, Issues and Questions (“MIQs”) posed by the Inspectors.
- 1.2 The Statement relates to land at Galley Common in Nuneaton (“the site”), which ASL controls and is promoting for development comprising a mix of market and affordable housing and community infrastructure (Regulation 19 Reference No: 125). The site is separated into two parcels - Parcel A is adjacent to Plough Hill Road and extends to approximately 6.1 hectares and Parcel B extends to approximately 6.2 hectares. The site forms part of a wider land ownership which has the potential to be used for habitat and biodiversity enhancements, as well as multi-functional recreational / amenity space. A plan of the site was included within the representations submitted in October 2023 on behalf of ASL in response to the Regulation 19 consultation exercise.
- 1.3 ASL have a longstanding track record in bringing forward major strategic sites for development in partnership with the UK’s largest and most respected housebuilders. The site is deliverable (suitable, available and achievable as defined by the National Planning Policy Framework) and can be brought forward early in the next Plan Period.
- 1.4 This Statement responds directly to questions 37 and 38 of the Inspectors’ MIQs for Matter 3 (Housing).
- 1.5 Overall, ASL are of the view that the Publication Plan in its current form is not sound and is not underpinned by a positively prepared or justified evidence base. It therefore does not meet the requirements of paragraph 16 of the National Planning Policy Framework. Nuneaton and Bedworth Borough Council (“NBBC”) has sought to expedite the preparation of the new Local Plan for political reasons, which is leading to an unsound and ill-prepared plan being prepared for publication and submission. ASL considers that the Local Plan requires a fundamental reset, in terms of its evidence, spatial strategy and land allocations.
- 1.6 For context to our response to Matter 3, our overarching comments on the Plan Review relate to:
 1. **Cross Boundary Legal and Procedural Issues** – It is not clear that, at present, the Council has sought to discharge its Duty to Co-operate or sought to fully understand if any cross boundary need exists. We consider that there is a risk that the Local Plan will not be legally sound unless the Council sets out how cross boundary matters have

been fully considered early in the plan-making process to underpin the Local Plan strategy.

2. **Deficient Evidence Base** – In its current form, ASL considers the Publication Plan evidence base has deficiencies that undermine the soundness of the emerging Local Plan. There are key evidence base documents that should be prepared and should inform the spatial strategy and proposed land allocations. These include (but are not limited to) an Urban Capacity Study, Review of the Settlement Boundary, Local Plan Viability Assessment and an updated Infrastructure Delivery Plan.
3. **Supporting Growth and Meeting Need** – ASL considers that NBBC should capitalise on its strategic location and support the Borough's potential to achieve greater economic and housing growth within the Local Plan. ASL considers that the relationship between housing and employment should be acknowledged and NBBC should plan for a positive economic growth scenario, with a spatial strategy that will support sustainable economic growth and address the affordability issues of the Borough in the long term. The Council should also be pro-active in supporting the growth potential of the wider sub-region.
4. **Review of the Settlement Boundaries** – The evidence base needs to be bolstered in relation to the issues the Borough is facing, including its housing requirement and the capacity of sites within the urban area. If the outcome of this evidence is an increase in housing need and a requirement to include additional sites in the Local Plan, this should include a review of the existing settlement boundaries around Nuneaton, as the Borough's primary location for growth. Sequentially, any review should consider deliverable sites within the open countryside before any amendment to the Green Belt is considered.

2 QUESTION 37 – SOUNDNESS OF THE HOUSING REQUIREMENT

Is the housing requirement figure of 545 dwellings annum/9,810 over the plan period as set out in Strategic Policy DS3 soundly based and does it accord with the evidence and national planning policy and guidance?

- 2.1 The housing requirement figure of 545 dwellings per annum / 9,810 over the plan period represents a significantly lower housing target than that proposed in the 2022 Preferred Options Consultation (646 dpa) and does not consider scenarios where housing need may point to a significantly higher requirement, owing to economic growth, a lack of affordability or via any unmet need from neighbouring Authorities.
- 2.2 ASL considers that there are material factors which should support an increase in the Borough's overall housing requirement, including:
1. **Economic growth** – there is a significant opportunity to capitalise on the strategic location and growth potential of the Borough by providing the employment opportunities and homes that will catalyse growth in Nuneaton and Bedworth. The Nuneaton and Bedworth Housing and Economic Development Needs Assessment ("HEDNA "), prepared by Iceni in May 2022, and the THR paper (November 2022) do not include any significant adjustments to support accelerated economic growth scenarios in the Borough or the sub-region.
 2. **Affordable housing provision** – the Nuneaton and Bedworth HEDNA (2022) identifies an overall Borough need of 407 affordable homes per annum. The 2022 Borough HEDNA concludes that *"the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the area. The scale of the affordable need is influenced by past investment decisions and funding availability as well as losses of stock (such as through right-to-buy/ acquire sales)"*. The Coventry and Warwickshire HEDNA (2022) sets out the affordability issues which are prevalent across the sub-region, identifying that 52.2% of households in Nuneaton and Bedworth Borough are unable to afford market housing without a subsidy, and more than 3,700 existing households that are currently in 'unsuitable housing'. These indicators point to significant issues with access to affordable housing in the Borough and, as such, a very significant uplift to account for affordability should be considered to prevent a worsening of the Borough's affordability crisis over the next Plan Period.
- 2.3 In summary, ASL considers that the housing requirement is not soundly based as it has not considered and ruled out a number of potential outcomes which may have a significant impact on the delivery of the Policy.

3 QUESTION 38 – CONSISTENCY WITH ECONOMIC AMBITIONS

Is the proposed housing requirement consistent with the economic growth ambitions of the Plan?

- 3.1 ASL considers the housing requirement in the Draft Plan to be unambitious and inconsistent with the Economic Growth Strategic Objective “to regenerate the Borough”. As stated in response to Question 37, there is a significant opportunity to capitalise on the strategic location and growth potential of the Borough by providing the employment opportunities and homes that will catalyse growth in Nuneaton and Bedworth. We consider that, based on the borough’s location and its potential to support growth that an uplift to support an accelerated growth scenario would be more consistent with the economic growth ambitions of the Plan.

4 CONCLUSION

- 4.1 ASL considers that the Draft Plan in its current form is unsound – not being positively prepared, justified or effective. The proposed spatial strategy and land allocations are underpinned by an evidence based that has not been positively prepared and reflects a Local Plan that is driven by political pressure. The Plan is therefore contrary to the guidance set out in paragraph 16 of the National Planning Policy Framework.
- 4.2 To make the Plan sound, an increased housing requirement, based on a robust set of relevant and up-to-date evidence, is needed. In order to meet a larger housing target, additional sites will need to be allocated for development, including the land at Galley Common in Nuneaton, which is suitable, achievable and available for a development comprising a mix of market and affordable housing and community infrastructure.