

NUNEATON & BEDWORTH BOROUGH PLAN REVIEW: EXAMINATION-IN-PUBLIC

Matter 3 (Issue 2) Housing Land Supply

on behalf of Taylor Wimpey

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September 2024

REPORT

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Prepared for:

Taylor Wimpey

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1 MATTER 3, ISSUE 2: THE FIVE YEAR SUPPLY AND OVERALL HOUSING SUPPLY POSITION

39. A) Will there be a five year supply of specific, deliverable sites from the intended date of adoption of the Local Plan?

B) Is the five year supply requirement as set out in the Updated Housing Land Supply Background Paper (UHLSBP)(CD31) calculated correctly and are the buffer, allowances and oversupply factors justified and accurate? Should it be calculated from 1 April 2025 or 1 April 2024?

C) Are all the sites which comprise the suggested five year supply in the UHLSBP (CD31) deliverable in accordance with Annex 2 of the National Planning Policy Framework?

D) Having regard to the UHLSBP (CD31) and other evidence, does the plan make provision for a supply of specific, developable or broad locations for growth for the subsequent years 6-10 and where possible years 11-15 of the remaining plan period?

- 1.1.1 RPS has prepared the following responses to the MIQs identified by the Inspectors on housing land supply matters. To support our response, we have undertaken a review of the various assumptions and schedule of sites claimed by the Council as being deliverable, as set out in the Updated Housing Land Supply Background Paper July 2024 (CD31). Our analysis is appended to this submission for the Inspector's consideration.

A) Will there be a five year supply of specific, deliverable sites from the intended date of adoption of the Local Plan?

- 1.1.2 The Council's evidence appears to point a five-year supply of deliverable land against the planned housing requirement in the submitted Plan (545 dpa). This is the case with or without oversupply being taken into account (we discuss oversupply in subsequent responses below) based on the Council's assumptions. The summary of the Council's land supply calculation is set out in Figure 1 of CD31.
- 1.1.3 However, this position is based on two flaws; firstly, the housing requirement does not take account of any unmet housing need from elsewhere in the Coventry & Warwickshire Housing Market Area (C&WHMA). As we have explained in our submissions on the overall housing need and requirement matters (Matter 3 Issue 1) and previous consultation responses, there will inevitably continue to be some element of unmet need that will need to be accommodated in the Borough as other plans move forward through the review process.

	Unmet need 2021-39 (standard method)	Redistribution	%	Unmet need (CW HEDNA)	Redistribution	%
Coventry	34,718			12,683		
Nuneaton and Bedworth		10,693	32%		4,058	32%
Annual contribution to N&B over plan period (18 years), dpa					225	

- 1.1.4 If we apply the figures identified in Paragraph 1.1.32 of our Matter 3 (Issue 1) Statement, reproduced in the table above, an uplift of 225 dwellings per annum would be attributed to Nuneaton and Bedworth to address unmet needs arising from Coventry. This would result in an increase in the requirement from 545 to 770 dpa. Married with adjustments to supply (which we discuss under Q39C), we would see the supply between 3.88 – 4.49 years, depending on whether the Standard Method, or HEDNA figure was used.
- 1.1.5 Secondly, the adopted housing requirement will become effectively out of date if the recent planning reforms of national policy and other changes to the planning system¹ published by the new Labour Government are brought into effect (expected later this year). The reforms in national policy for assessing housing need will fundamentally change the scale and distribution of overall housing need across the C&WHMA and which will impact on how housing need, requirements and supply is planned for across those authorities in the future. We comment further on what we think this will mean for the Plan in our response to question 39(D).
- 1.1.6 The impact of the revised standard method figure on the current supply position in the Borough is highlighted below. This shows that when using the Council's supply assumptions (excluding any unmet need contribution) the position would fall below the minimum five-year threshold required in accordance with national policy². Our calculation is also provided, which shows a worse position.

Revised NPPF Standard Method (August 2024)	LPA supply	RPS supply
5 X annual housing need (774 dpa)	3,870	3,870
5% Buffer	194	194
Total 5YHLS Requirement	4,064	4,064
Deliverable Supply over 5 Years (CD31)	3,756	3,162
Total supply (in years)	4.62	3.89

- 1.1.7 Based on the above, it is clear the land supply position on adoption will be impacted by the NPPF reforms. We recommend that measures are incorporated into the final plan, through main modifications, to ensure the Council can move quickly to address the full implications once these are known. As we say in our response to question 39(D), this should include a commitment in the plan to an immediate review.

¹ Open consultation Proposed reforms to the National Planning Policy Framework and other changes to the planning system, MHCLG, August 2024

² NPPF September 2023, para 74

B) Is the five year supply requirement as set out in the Updated Housing Land Supply Background Paper (UHLSBP)(CD31) calculated correctly and are the buffer, allowances and oversupply factors justified and accurate? Should it be calculated from 1 April 2025 or 1 April 2024?

1.1.8 No.

Base date

1.1.9 The Council has sought to 'roll forward' the base date of the land supply assessment to 1 April 2025. The Council shows the effect of doing this in Figure 1 of CD31 (row B), which includes a 'projected' completion of 944 dwellings for the 2024/25 monitoring period. The Council says at paragraph 3.8 of CD31 that:

"As a test of soundness the NPPF requires the plan to demonstrate a five-year housing land supply (5YHLS) position at the intended date of plan adoption, which is proposed to be 1st April 2025."

1.1.10 This approach is erroneous. For a number of reasons, we recommend the base date for this land supply assessment is 1 April 2024.

1.1.11 Firstly, as a matter of logic the Council cannot be certain how many net new homes will be completed during the current monitoring year as we are only mid-way through that year and the activity of counting completions has yet to occur (until after end of March 2025) based on the published information.

1.1.12 Secondly, the accuracy of any figures put forward by the Council on completions during 2024/25 cannot be scrutinised as part of the examination process. This is important because the Council has already incorrectly estimated the number of completions during 2023/24 and which they admit to doing so in Table 1 of CD31. This shows that they had estimated 1,087 net completions for 2023/24 in the 1 April 2023 trajectory, but it transpired that only 1,009 net completions were achieved in that year based on the updated trajectory as at 1 April, 2024; a difference of 78.

1.1.13 We also note the completion figures for 2024/25 in Table 1 also differ by 125 dwellings.

1.1.14 Taken together, we do not have any confidence that the Council can predict with sufficient accuracy the number of net completions during 2024/25. We therefore do not consider it sound to roll forward the base date of the supply assessment as is proposed. Consequently, the position should be based on what is known now, which includes the net completions for 2023/24 and base date of 1 April 2024. This is a sound and appropriate starting point for assessing the forward supply for the Plan.

Calculating the appropriate housing land requirement

1.1.15 We acknowledge that the submitted Plan is being examined under the September 2023 version of the NPPF, and so the components of the housing requirement for the purposes of assessing land supply are defined in that version. Paragraph 74 of the September 2023 NPPF defines those

components as comprising the housing requirement set out in adopted strategic policies, including an 'appropriate buffer'. In this case, the minimum annual housing requirement figure for this assessment is 545dpa (as expressed in Policy DS3). This gives a five-year housing land requirement starting point figure of 2,725 dwellings for the whole five year period, and so we agree with row A of Figure 1.

- 1.1.16 The Council has also applied a 5% buffer because Nuneaton & Bedworth currently scores 125% under the Housing Delivery Test ("HDT"), as stated in paragraph 3.1 of CD31. We also agree with this assumption.
- 1.1.17 The Council then provides a commentary at paragraphs 3.2 to 3.7 of CD31, which seeks to justify the inclusion of a discount for recent delivery of homes against the proposed housing requirement since the base date of the submitted Plan (2021), which the Council define as 'oversupply' since that date. The Council has identified an oversupply of 1,525 dwellings (Figure 1, Row B). This is derived from total actual (and projected) completions of 3,705 between 2021/22 and 2024/25, against the requirement of 2,180.
- 1.1.18 The 'required over supply adjustment' equates to 1,525 dwellings divided by the remainder of the plan period at adoption (14 years) or 109 'fewer' homes per annum over the remainder of the plan. The 'over-supply adjustment' within the five-year period is set as 545 dwellings (109 x 5) (Row C).
- 1.1.19 This figure has then been discounted from the starting figure of 2,725, to give an 'adjusted' five year starting point of 2,180 dwellings (Row D).
- 1.1.20 When the 5% buffer (Row E) is added, the Council's adjusted five year housing land requirement is 2,289 dwellings (Row F).
- 1.1.21 In doing so, the Council has applied what is usually coined as the 'Reverse Liverpool' method to accounting for the past delivery of homes, which the Council claims is the 'sound and logical approach in this situation' (CD31, para 3.4).
- 1.1.22 The Council rightly point out (at paragraph 3.2 of CD31) that the high court ruling at *Tewkesbury*³ concluded that the NPPF and PPG are (and remain) silent on whether additional supply could be used to offset shortfalls against requirements in future years; and that it is down to the exercise of planning judgement by the decision-maker as to whether to take into account any oversupply since the base date of the plan. We fundamentally object to any allowance for 'oversupply' in the forward supply assessment, for the following reasons which are based on our planning judgement.
- 1.1.23 Firstly, it is illogical to suggest that delivery of homes has in some way 'exceeded' requirements or represents a 'surplus' of any kind. This is because the adopted and updated targets are expressed as 'minima' figures rather than 'maxima' not to be exceeded. We therefore completely disagree with the assertion (at paragraph 3.7 of CD31) that the Council will be 'penalised' for meeting needs

³ *Tewkesbury Borough Council v SSHCLG, J J Gallagher Limited and Richard Cook* [2021] EWHC 2782 (Admin)

in the early years of the plan. In this situation, delivery can only be either in deficit or achieved in line with the minimum homes required.

- 1.1.24 Secondly, an important consideration is the delivery of homes over a longer period since 2011. This is because the delivery of housing since then, and between 2021 and 2024, has occurred in the context of the adopted Borough Plan requirements. The adopted housing requirement for the period 2011 to 2024 was 8,396 dwellings⁴, which comprised 502 dpa over the first seven years, and 812 dpa over the next six years. In contrast, the number of net new completions totalled 6,980 dwellings⁵ during the same timeframe. This represents an actual shortfall of 1,416 homes delivered during the monitoring period to 2023/2024.
- 1.1.25 If we apply the updated housing requirement (545dpa) to the period 2021-2024 instead of the adopted requirement (812) the shortfall is lower, but is still 801 dwellings.
- 1.1.26 And even if we include the ‘projected’ completions of 944 dwellings for 2024/25 (which we object to as per our response above) and compare this to the adopted requirements for 2011-2021 and the updated requirement for 2021-2025, there remains a shortfall of 402 dwellings over the entire period to date.
- 1.1.27 Consequently, when looking at historical delivery of homes in the Borough over a longer period than three years, it is clearly the case that there has been no over-supply. This is a relevant consideration in determining whether an oversupply ‘adjustment’ is justified in this situation.
- 1.1.28 Thirdly, another important consideration is that because of the uncertainty in the current policy and guidance on oversupply, the previous Government has intended to clarify how historic oversupply would be accounted for in land supply assessments when it consulted on its changes to national policy in December 2022⁶ as part of the Levelling Up and Regeneration Bill (“LURB”). It stated that the then Conservative Government would bring the position on oversupply into line with under-delivery when calculating five year land supply, to enable Councils to include historic oversupply and to demonstrate it is meeting overall housing requirements. Importantly, they said that this would be ‘*implemented by amending the Framework and planning practice guidance*’.
- 1.1.29 Paragraph 77 of the revised (current) version of the NPPF (December 2023) refers to ‘*further information*’ provided in planning guidance provides on calculating the housing land supply, including the circumstances in which past shortfalls or over-supply can be addressed. However, the PPG was never updated to reflect the intended changes. Both the NPPF and PPG remain ‘silent’ on the matter of oversupply when looking forwards into the future.
- 1.1.30 Since that time, the reforms put out by the new Labour Government intend to reverse the changes introduced in the current NPPF and also intend to remove the wording on past oversupply in

⁴ Based on Adopted Borough Plan Housing Trajectory (2011-2018 = 502; 2018-2031 = 812)

⁵ AMR 2022/23, Figure 7; CD31, Figure 1

⁶ Levelling-up and Regeneration Bill: reforms to national planning policy , Published December 2022

paragraph 77 which, in their view, ‘...was introduced to set out that previous over-supply could be set against upcoming supply. Given the chronic need for housing we see in all areas, the consultation says, we should celebrate strong delivery records without diluting future ambitions...’⁷. We strongly agree with this and the Government’s intention to clarify the approach to dealing with oversupply. To adopt the Council’s proposed approach in CD31 would run counter to Government’s expectations moving forward and further discredits the method used by the Council in accounting for oversupply. On this basis, the appropriate housing land requirement figure is 2,861 dwellings⁸ (subject to the 545 dpa figure being soundly-based).

- 1.1.31 Taken together, the Council has not provided sufficient justification by applying a mechanical adjustment to the minimum housing requirement as is proposed in CD31. Accordingly, the adjustment should be removed from the updated calculation, and revised calculation issued for consideration. Furthermore, a main modification should be inserted into the final, adopted Plan in order to clarify that the justification for accounting for oversupply has not been established and would not be appropriate based on current evidence and the likely future direction of national policy and guidance.

C) Are all the sites which comprise the suggested five year supply in the UHLSBP (CD31) deliverable in accordance with Annex 2 of the National Planning Policy Framework?

- 1.1.32 No.
- 1.1.33 As part of our review of the Council’s supply, we have identified a number of sites whose deliverability against the NPPF definition is questioned. A schedule of the sites we have reviewed is attached at **Appendix 1**.
- 1.1.34 In summary, we contend the deliverable is reduced to 3,162 dwellings (from 3,750 claimed by the Council shown in Summary Table in CD31). This amounts to 588 dwellings that we contend should be removed from the supply (using the correct base date of 1 April 2024 over the period to end of March 2029).

D) Having regard to the UHLSBP (CD31) and other evidence, does the plan make provision for a supply of specific, developable or broad locations for growth for the subsequent years 6-10 and where possible years 11-15 of the remaining plan period?

- 1.1.35 Based on the Council’s updated trajectory, it appears that sufficient land has been identified to provide for the remaining plan period to 2039.
- 1.1.36 However, whilst not directly for consideration in relation to soundness of this plan, we would draw the Inspector’s attention to the recent planning reforms of national policy and other changes to the

⁷ Footnote 1, paragraph 20

⁸ 2,725 plus 5% buffer

planning system published by the new Labour Government in August⁹. The proposed reforms include revisions to the standard method for calculating minimum local housing need at the local authority level using a 'stock-based' approach, rather than household projections as a starting point. For the Coventry & Warwickshire Housing Market Area ("CWHMA"), which includes Nuneaton & Bedworth. This will see changes to the quantum and distribution of need across the HMA.

- 1.1.37 As we show below, the scale of need for the CWHMA under the proposed reforms would increase significantly local needs compared to the C&W HEDNA adjusted trend-based figures.

C&W authorities (dpa)	'Preferred' need C&W HEDNA (2022) (EB7.1)	HEDNA Standard Method 2022 (current)	Standard Method 2024 (proposed)
Coventry	1,964	3,188	1,527
North Warwickshire	119	176	381
Nuneaton & Bedworth	409	435	774
Rugby	735	516	642
Stratford-upon-Avon	868	564	1,098
Warwick	811	675	1,080
Totals	4,906	5,554	5,502

- 1.1.38 We can see that the overall HMA-wide need is around 600 dwellings per annum higher based on the revised standard method compared to the HEDNA 2022 figures used to inform the Plan, which represents a significant increase. Subject to confirmation of the reforms (expected later this autumn) the revised methodology will provide a 'mandatory' starting point for assessing local housing need and determining planned housing requirements in local plans. This is a change to current national policy¹⁰, which defines these figures as 'advisory' only.
- 1.1.39 The proposed need figures currently identified, or subsequent updates to those figures, will need to be taken into account at the next review stage of the Nuneaton & Bedworth Borough Plan (subject to adoption) at some point within the next five years. The proposed need for the Borough under the reforms (774) is more than 200 dwellings in excess of the draft housing requirement in the Plan (545). Wider reforms to national policy indicate that those Councils with plans that have reached Regulation 19 (pre-submission stage) on or before the publication date (plus one month) of the revised NPPF, where the newly-adopted figures meet this criteria, should proceed to examination within a maximum of 18 months from the publication date of the revised NPPF. This will include Nuneaton & Bedworth.

⁹ Open consultation Proposed reforms to the National Planning Policy Framework and other changes to the planning system, MHCLG, August 2024

¹⁰ NPPF December 2023, para 61

- 1.1.40 In these circumstances, we recommend to the Inspectors that a main modification is made which makes a commitment to a potential for an immediate review of the Plan following adoption. A review will be required not only address the significant increase in need for the Borough, but also because the evidence base used to inform the HEDNA 2022 would not align with the new standard ('stock-based') methodology, and so would be effectively out of date. This would be case for all the other authorities in the C&WHMA, with the exception of Nuneaton & Bedworth, who are at earlier stages of their own plan reviews. It is also our contention that Coventry will continue to require contributions towards it future [unmet] need based on the revised methodology figures. Consequently, the main purpose of the review would be to address the implications of the revised local housing need for the C&WHMA as a whole.

Appendix 1

Site Type	Site Ref	Council Application No.	Address	Status	Total Capacity	Year 24/25	Year 25/26	Year 26/27	Year 27/28	Year 28/29	Sum of Supply in Supply 2024-29	Year 24/25 (RPS)	Year 25/26 (RPS)	Year 26/27 (RPS)	Year 27/28 (RPS)	Year 28/29 (RPS)	RPS Sum of Supply in Supply 2024-29	RPS Commentary
Full Planning Permission	215	11514	Tower Road, Bedworth Water	U/C	6	6	0	0	0	0	6	6	0	0	0	0	6	Category A Site
Full Planning Permission	812	12181	Chapel Street, Bed	U/C	19	9	0	0	0	0	9	9	0	0	0	0	9	Category A Site
Full Planning Permission	1087	10197	Queens Rd, 265, Nun	Implemen ted	14	0	0	0	0	0	0	0	0	0	0	0	0	Category A Site
Full Planning Permission	1414	34287	Site 48a022 - Spinney Lane, Coventry Lane, Nuneaton	U/C	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1487	35478	39 Willis Grove, Bedworth	U/C	2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Full Planning Permission	1490	35604	Ex Coal Yard, Site 50a006 - York Street, York Street, Nuneaton,	N/S	3	3	0	0	0	0	3	3	0	0	0	0	3	Category A Site
Full Planning Permission	1501	35402	Nuneaton & Bedworth Borough Council, Council Depot, St Marys Road, Nuneaton	U/C	95	53	0	0	0	0	53	53	0	0	0	0	53	Category A Site
Full Planning Permission	1509	39618	"Site 51a036 - Burgage Walk", Burgage Walk, Nuneaton,	Consent Expired	14	0	14	0	0	0	14	0	0	0	0	0	0	Council state "A housing trajectory pro-forma has been completed and signed. A reserved matters application was granted on 18.05.2022 for 123 dwellings (council reference 038387). The Site is under construction. Site does not appear to have detailed permission and should not be counted as a category A Site. Furthermore, extant permission is counted elsewhere in land supply and so acts as double counting in absence of consent being granted
Full Planning Permission	1522	36155	Site 119a001 - Coventry Road,	U/C	6	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Full Planning Permission	1547	36201	Phase 3, "Site 37b008 - Edinburgh Road", Edinburgh Road, Nuneaton,	U/C	142	32	0	0	0	0	32	32	0	0	0	0	32	Category A Site
Full Planning Permission	1549	35998	Garages "Site 52C045 (r/o 154- 166 Gadsby Street)", William Street	U/C	2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Full Planning Permission	1562	36261	"Site 31A003-rear Whitehouse Farm", Higham Lane, Nuneaton, REDROW HOMES : (HERITAGE FIELDS)	U/C	200	15	0	0	0	0	15	15	0	0	0	0	15	Category A Site
Full Planning Permission	1565	36109	Plough Hill Golf Centre, "Site 36A002 - Plough Hill Golf Centre", Plough Hill Road, Nuneaton		300	0	0	0	0	0	0	0	0	0	0	0	0	Category A Site
Full Planning Permission	1567	36470	2 Royal Oak Lane, Ash Green	U/C	12	12	0	0	0	0	12	12	0	0	0	0	12	Category A Site
Full Planning Permission	1568	36709	Ritz Bingo, Abbey Street,	U/C	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1574	37106	Public conveniences, Chapel St, Bedworth	U/C	2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Full Planning Permission	1587	37066	Site - 37C008 land to the rear Land to rear of 79-117 Vale	U/C	16	16	0	0	0	0	16	16	0	0	0	0	16	Category A Site
Full Planning Permission	1590	37329	1 Lime Grove, Nuneaton	U/C	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1595	37509	285 Marston Lane, Nuneaton, Warwickshire CV11 4RH	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1597	37570	50 Shaftsbury Avenue Coventry CV7 8NE	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1598	38031	33 Lime Grove Nuneaton CV10	U/C	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1602	36877	"Site 103B009 - Land off", Astley Lane, Bedworth, (adj The Heath)	U/C	169	40	44	0	0	0	84	40	44	0	0	0	84	Category A Site
Full Planning Permission	1607	37666	The Bull Bull Street Nuneaton	U/C	5	5	0	0	0	0	5	5	0	0	0	0	5	Category A Site
Full Planning Permission	1608	36806	The Carousel Dark Lane Bedworth	U/C	17	17	0	0	0	0	17	17	0	0	0	0	17	Category A Site
Full Planning Permission	1611	37904	Loads of Tread 86 Orchard	U/C	2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Full Planning Permission	1620	37862	Land off Site 60a005 Atholl Crescent Nuneaton	N/S	16	16	0	0	0	0	16	16	0	0	0	0	16	Category A Site
Full Planning Permission	1621	38372	99 Woodlands Road Bedworth CV12 0AD	U/C	9	7	0	0	0	0	7	7	0	0	0	0	7	Category A Site
Full Planning Permission	1626	37381	2 High Street Nuneaton	U/C	2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Full Planning Permission	1631	37971	14 -16 Bull Street Nuneaton	U/C	2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Full Planning Permission	1634	38303	S C T Electrics 75-91 Heath End Road Nuneaton CV10 7JG	U/C	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1635	38362	Cream 127 Abbey Street Nuneaton CV11 5BZ	U/C	2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Full Planning Permission	1638	38257	Site 49B005 - Byford Court	U/C	12	12	0	0	0	0	12	12	0	0	0	0	12	Category A Site
Full Planning Permission	1646	38535	Woodlands Farm Ansley Road Nuneaton Cv10 8LR	U/C	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1648	36510	Cricketers Arms, 60 Nuneaton	U/C	9	9	0	0	0	0	9	9	0	0	0	0	9	Category A Site
Full Planning Permission	1649	38759	5A Harefield Road, Nuneaton	N/S	2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Full Planning Permission	1650	37597	187 Heath End Road Nuneaton	U/C	10	10	0	0	0	0	10	10	0	0	0	0	10	Category A Site
Full Planning Permission	1652	38515	Rosewood Mile Tree Lane	N/S	3	3	0	0	0	0	3	3	0	0	0	0	3	Category A Site
Full Planning Permission	1653	38772	28c Heath Road, Bedworth,	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1659	39139	20 Tomkinson Road, Nuneaton, Warwickshire	U/C	3	3	0	0	0	0	3	3	0	0	0	0	3	Category A Site
Full Planning Permission	1662	38905	20 Windmill Road Exhall	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1663	38916	5 Portia Close, Nuneaton, Warwickshire	U/C	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1665	39251	Inglewood Smorrall Lane	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1666	39062	Lamb & Flag Inn Church Road	U/C	4	4	0	0	0	0	4	4	0	0	0	0	4	Category A Site
Full Planning Permission	1667	38088	Site 37a004 - Tudor Road Land off (R/o 8-54 access between 12 & 14 Tudor	N/S	6	6	0	0	0	0	6	6	0	0	0	0	6	Category A Site
Full Planning Permission	1668	38837	Park Farm Plough Hill Road Nuneaton Cv10 9NY	U/C	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1669	39308	Site 32c001 - Adjacent 233 The	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1671	38503	Queens Road Books 127 Queens Road, Nuneaton, CV11 5LD	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1672	38896	Land adj 9 "Site 61A003", Hare	U/C	4	4	0	0	0	0	4	4	0	0	0	0	4	Category A Site
Full Planning Permission	1674	38448	Land Adjacent to 126 Bedworth Road Site 108A004 Bedworth Road Bulkington	U/C	3	3	0	0	0	0	3	3	0	0	0	0	3	Category A Site
Full Planning Permission	1675	38625	Units Site 50D006 Marlborough Road Nuneaton	U/C	4	4	0	0	0	0	4	4	0	0	0	0	4	Category A Site
Full Planning Permission	1677	35238	111 Bedworth Road,	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1678	39392	5A Harefield Road, Nuneaton,	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1679	39317	11 Abbey Green Nuneaton	U/C	3	3	0	0	0	0	3	3	0	0	0	0	3	Category A Site
Full Planning Permission	46a010	33601	Rear of 89-169 Tunnel Road	U/C	14	14	0	0	0	0	14	14	0	0	0	0	14	Category A Site
Full Planning Permission	1682	39033	Mayway Construction Ltd 2 Burbages Lane Longford	U/C	8	8	0	0	0	0	8	8	0	0	0	0	8	Category A Site
Full Planning Permission	1683	39114	Site 114A006 Goodyers End Lane (No 347) & 2 Royal Oak	U/C	8	8	0	0	0	0	8	8	0	0	0	0	8	Category A Site
Full Planning Permission	1685	39261	221 Lutterworth Road Nuneaton Cv11 6PX	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1687	39502	14 Bull Street Nuneaton CV11	U/C	3	3	0	0	0	0	3	3	0	0	0	0	3	Category A Site
Full Planning Permission	1693	39092	The Lodge School Walk Nuneaton CV11 4PJ	N/S	9	9	0	0	0	0	9	9	0	0	0	0	9	Category A Site
Full Planning Permission	1696	39702	12 Oaston Road Nuneaton	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1698	39884	205 Greenmore Road	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1699	39696	25 Cheverel Place, Nuneaton	U/C	2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Full Planning Permission	1700	39764	230 Newtown Road, Bedworth,	N/S	1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Full Planning Permission	1703	39374	Land rear of 9 - 15 Site 51D013	N/S	5	5	0	0	0	0	5	5	0	0	0	0	5	Category A Site
Full Planning Permission	1481 Previo us ref 9/OL	34969	Cresswells Farm, The Long Shoot, Nuneaton, (JELSONS Ltd)	U/C	150	39	9	0	0	0	48	39	9	0	0	0	48	Category A Site
Full Planning Permission	1496	34076	Site 31A002 - Land off, Higham Lane, Nuneaton, (adj Nuneaton Fields Farm) (Persimmon Homes EATON PLACE)	U/C	453	50	50	50	50	23	223	33	33	33	33	33	165	Planning performa indicates 33 dwellings per annum rather than the higher rate indicated in the trajectory. 58 dwellings removed from supply. Though they agree with the Council's figure, this is the contrary to the response to section 33. Appears unreasonable basis for housing delivery to increase given evidence provided by the developer.

Full Planning Permission	HSG1	3512	Nuneaton Fields Farm	Full	34	0	0	0	9	25	34	0	0	0	9	25	34	The site is allocated as part of a wider strategic allocation with pre-application discussions. Evidence is based on a planning proforma submitted. Appears the site relates to new land. However, viability appears dependent on housing delivery on neighbouring site. On balance, retain in supply as deemed as deliverable given full permission.
Full Planning Permission	40/OL / 1584	36921	Callendar Farm - Taylor Wimpey	U/C	425	50	50	27	0	0	127	50	50	27	0	0	127	Built out rates are higher than other sites across the wider allocation. Application proforma not provided in updated land supply paper (CD31). Maintained at the same level as under construction.
Full Planning Permission	40/OL / 1585	32387	Callendar Farm - David Wilson	U/C	123	45	33	0	0	0	78	45	33	0	0	0	78	Category A Site
Full Planning Permission	40/OL / 1586	38174	Callendar Farm - Vistry Homes	U/C	201	38	0	0	0	0	38	38	0	0	0	0	38	Category A Site
Full Planning Permission	HSG3	35037	HSG3- Gipsy Lane	U/C	575	0	39	80	80	80	279	0	39	67	67	67	240	Lichfields Built Out Rate applied as no evidence to justify Council's rates
Full Planning Permission	HSG8	36491	HSG8 West of Bulkington Ravloe Gardens	U/C	188	50	30	0	0	0	80	50	30	0	0	0	80	Category A Site
Full Planning Permission	HSG9	37112	HSG9 - Land off Golf Drive	Commenced	621	15	50	88	95	95	343	15	67	67	67	67	283	Lichfields Built Out Rate applied as no evidence to justify Council's rates
Full Planning Permission	HSG1 0	38497	"Site 52D067 - Land off" (Land adj Crematorium), Eastboro	U/C	360	50	50	50	50	50	250	50	50	50	50	50	250	Category A Site
Full Planning Permission	HSG2	36870 378907	HSG12 - Former Hawkesbury Golf course (Bovis)	U/C	204	50	58	0	0	0	108	50	58	0	0	0	108	Category A Site
Outline Planning Permission	48/OL	373310	Land adj. 23 Aston Road, Nuneaton	N/S	3	0	3	0	0	0	3	0	3	0	0	0	3	Category A Site
Outline Planning Permission	52/OL	36050	North Warwickshire and South Leicestershire College Hinckley Road, Nuneaton	N/S	147	0	0	20	40	40	100	0	0	20	40	40	100	No departure from phasing has occurred thus far. Council wanted a higher figure, but housebuilder went back with a lower figure (Seven Homes). A reserved matters application is under consideration - retain
Outline Planning Permission	54/OL	37658	48 Bedworth Road, Bulkington	N/S	2	0	2	0	0	0	2	0	2	0	0	0	2	Category A Site
Outline Planning Permission	57/OI	39087	Plough Hill Farm Cottage Plough Hill Road Nuneaton CV10 9NZ	N/S	3	0	3	0	0	0	3	0	3	0	0	0	3	Category A Site
Outline Planning Permission	61/OL	39043	224 The Long Shoot, Nuneaton, Warwickshire	N/S	2	0	2	0	0	0	2	0	2	0	0	0	2	Category A Site
Outline Planning Permission	62/OI	38760	416 Nuneaton Road, Bulkington, Bedworth,CV12 9SB	N/S	1	0	1	0	0	0	1	0	1	0	0	0	1	Category A Site
Outline Planning Permission	66/OL	39435	Site 318012 150 to 164 The	N/S	2	0	2	0	0	0	2	0	2	0	0	0	2	Category A Site
Outline Planning Permission	67/OL	39461	Site 608022- land bet Heathside 285	N/S	1	0	1	0	0	0	1	0	1	0	0	0	1	Category A Site
Outline Planning Permission	70/OL	39270	117 The Long Shoot Nuneaton	N/S	4	0	4	0	0	0	4	0	4	0	0	0	4	Category A Site
Outline Planning Permission	71/OL	39005	Land off Lancing Road, Findon Close,	N/S	230	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Outline Planning Permission	40/OL/1584	34615	Callender Farm - Jelson	N/S	190	0	0	35	40	40	115	0	0	0	35	40	75	Highham Lane appeal decision moves delivery back by one year, which we agree with
Prior Notification	25PN	40007	Bishop Simmons Mitre House School Road Bulkington Bedworth CV12 9JB		3	3	0	0	0	0	3	3	0	0	0	0	3	Category A Site
Prior Notification	26PN	40065	White Lion Chambers, 44 High Street, Bedworth		17	10	7	0	0	0	17	10	7	0	0	0	17	Category A Site
Prior Notification	31PN	39471	2A Norman Avenue Nunetaon Cv11 5NX		2	2	0	0	0	0	2	2					2	Category A Site
Prior Notification	32PN	39552	Swallow Meadows Farm The Birches Bulkington Bedworth CV12 9PW		2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Prior Notification	33PN	39771	Orchard Croft Long street Bulkington Bedworth CV12 9JZ		1	1	0	0	0	0	1	1	0	0	0	0	1	Category A Site
Prior Notification	34PN	39788	Site at 53-53a Long Street Bulkington Nuneaton CV12 9JZ		2	2	0	0	0	0	2	2	0	0	0	0	2	Category A Site
Non Strategic Allocation	NSRA-1	38716	Former Bedworth Rugby Club, Smarts Road		122	61	61	0	0	0	122	61	61	0	0	0	122	Category A Site
Non Strategic Allocation	NSRA-2		Former Manor Park Community School		58	0	0	0	25	27	52	0	0	0	0	0	0	Site due to be sold following variation of condition consent. No reserved matters application - remove
Non Strategic Allocation	NSRA-3	39136	West of Coventry Road / Wilsons Lane, Exhall (HSG6)		95	43	52	0	0	0	95	43	52	0	0	25	120	Category A Site
Non Strategic Allocation	NSRA-4		Vicarage Street Development Site		65	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Non Strategic Allocation	NSRA-5	39175	Land rear of Burbages Lane		45	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Non Strategic Allocation	NSRA-6		Land at Bucks Hill, Nuneaton		71	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Non Strategic Allocation	NSRA-7		Ex co-op buildings, Abbey Street, Nuneaton		33	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Non Strategic Allocation	NSRA-8	37658	Land rear of Lilleburne Drive and Willow Close		29	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Non Strategic Allocation	NSRA-9	38144	Former New Inn Public House, Bulkington		42	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Non Strategic Allocation	NSRA-10		Land at Bermuda Road, Nuneaton		25	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Non Strategic Allocation	NSRA-11		Upper Abbey Street, Nuneaton		22	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Non Strategic Allocation	NSRA-13		Armson Road, Exhall		15	0	0	15	0	0	15	0	0	0	0	0	0	Proforma submitted by landowner (LPA) indicates an outline application to be determined, but no further evidence provided to demonstrate deliverability - remove
Non Strategic Allocation	NSRA-14		Mill Street / Bridge Street, Nuneaton		15	0	0	0	15	0	15	0	0	0	15	0	15	Proforma shows site has resolution to grant subject to s106. On balance retain in supply
Non Strategic Allocation	NSRA-15	38762	Bennetts Road, Kerseley		10	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Strategic Allocation	SHA-1	35279	Land at Top Farm		1665	15	36	25	100	100	276	0	15	36	25	90	166	Lichfield discount applied plus trajectory change as per inspector comments at the Higham appeal decision. Full planning permission was granted on
Strategic Allocation	SHA-2		Land at Arbury		1525	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Strategic Allocation	SHA-3		Land at Tuttle Hill (Judkins)		325	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Strategic Allocation	SHA-4	39049	Hospital Lane		455	0	0	80	100	100	280	0	0	0	0	100	100	Appeal decision drops to 100 dwellings - have applied for the purposes of assessment
Strategic Allocation	SHA-5	38375	West of Bulkington-Redrow		89	25	50	14	0	0	89	25	50	14	0	0	89	Confirmed at appeal
Strategic Allocation	SHA-5	38856	West of Bulkington - Vistry Homes		149	0	0	25	50	50	125	0	0	28	50	50	128	Confirmed at appeal
Strategic Allocation	SHA-5	37425	West of Bulkington - Elford Homes		42	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Strategic Allocation	SHA-5	39111	West of Bulkington - Rosconn		95	0	0	0	25	35	60	0	0	0	25	35	60	Confirmed at appeal
Strategic Allocation	SHA-6		Hawkesbury Golf Course		176	25	50	35	25	41	176	25	50	35	25	41	176	Lower figure than appeal figure, which is 345
Strategic Allocation	SHA-7		Bowling Green Lane		93	0	0	0	0	0	0	0	0	0	0	0	0	Not included in supply
Strategic Allocation	SHA-8	37237	Wilson Lane		73	0	0	0	25	48	73	0	0	0	0	25	25	No evidence of deliverability, have moved back a year to reflect.
Windfalls						0	0	0	42	42	84				42	42	84	
10% discount for non-implementation						-6	-6	-6	0	0	-18	-6	-6	-6			-18	
						950	695	538	771	796	3750	918	660	371	483	730	3162	