

## 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).

It should be noted that these representations have not sought to respond to each question within the hearing statements, only those that are relevant to FCC Environment’s original representations on the Draft Local Plan.

### *Matter 3 – Housing*

#### 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?***

According to the Council’s latest ‘Updated Housing Land Supply Background Paper’ (UHLSBP) (CD31), the Council has a supply of 8.2 years. We do not intend to review the deliverability of each of the sites included within this. However, there is an inconsistency between the trajectory shown for SHA3 and the ‘Housing Delivery Evidence’ for the site at page 141 of the UHLSBP.

The updated detailed site-specific trajectories are shown in a table at Appendix B of the UHLSBP. For SHA3, the table indicates a total capacity of 325 units, with completions only coming forward from year 2029/30 (i.e. beyond the five-year supply period). However, the allocation is for at least 350 units, with an outline planning application submitted in February 2024 for up to 400 units. The proposed units are expected to come forward from 2026/27, with a total of 125 units to be delivered within the five-year period, as is shown within the suggested changes to the projected completions within the ‘Housing Deliverability Evidence’ for SHA3. We therefore consider that these 125 units should be added to the five-year supply.

In relation to Council’s stated five-year supply figure, it is also noted that the Planning Inspector’s in two recent appeal decisions found the Council to have a significantly lower supply as follows:

- Land west of Higham Lane (Appeal Ref: APP/W3710/W/23/3329913 and APP/R3705/W/23/3329915)), the Inspector indicated a supply of **3.4 years**.

- Weddington Road (Appeal Ref: APP/W3710/W/23/3330615), the Inspector indicated a supply of **2.74 years**.

On this basis, given the substantial divergence between the Council's stated supply position and that indicated in recent appeal decisions, it is not clear that there will be a five-year supply of specific, deliverable sites from the intended date of adoption of the Local Plan.

In addition, in July 2024, the new Labour government published a draft of the revised NPPF which is open for public consultation until 24<sup>th</sup> September 2024. Alongside the proposed changes to the NPPF, a revised Standard Method is proposed that sets out the starting point for each local authorities housing requirement. This revised method is to be used as part of the process for preparing local plans. Using the revised Standard Method, the housing need for Nuneaton & Bedworth would increase from 421 dwellings under the current method to 774 dwellings per annum. While this change is not yet adopted, it is clearly the direction of travel and a material consideration. At the very least, if the Borough Plan is adopted with the current requirement of only 545 dwellings per annum and if the revised Standard Method is adopted in its current form, the Council would need to carry out an early review of the Plan to ensure consistency with the new national policy.

The proposed revisions to the NPPF also re-iterate the need for local plans to provide for unmet development needs from neighbouring areas under paragraph 27. There are potential unmet housing needs in Coventry, which do not appear to have been sufficiently addressed in the emerging 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?***

We have set out our concerns with the proposed housing requirement of 545 dwellings per annum in our representations to Strategic Policy DS3 on our Regulation 19 consultation response, and we do not intend to repeat these here.

Within the proposed revisions to the NPPF currently being consulted on, transitional arrangements are proposed for emerging plans in preparation. To provide stability and certainty for plans at latter stages of scrutiny (such as with the NBBC Borough Plan Review), it states that *"those plans at examination will continue to be examined under the version of the NPPF they were submitted under. However, if the revised LHN figure is more than 200 dwellings per annum higher than the annual housing requirement set out in the adopted version of the plan, upon introduction of the new plan-making system, the local planning authority will be required to begin preparation of a plan under the new system as soon as possible"*.

In the case of Nuneaton and Bedworth, the revised LHN figure is more than 200dpa higher. In this context, while we support the adoption of the Plan, the Council should carry out an early review of it to ensure consistency with the new national policy.

***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?***

We do not intend to comment on the deliverability of each of the sites comprising the suggested five-year supply.

However, Strategic Site SHA3 is not included within the five-year supply, with the table in Appendix B indicating that units would only start to be delivered from 2029/30 (i.e. the 6<sup>th</sup> year). We consider that 125 units from the site are deliverable within the five-year period (starting from 2026/27), in line with the suggested changes to the projected completions within the 'Housing Delivery Evidence' for SHA3. The Council's trajectory should be updated to reflect this.

Strategic Site SHA3 is a deliverable site in accordance with Annex 2 of the NPPF. The site is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing will be delivered on the site within five years.

An outline planning application for up to 400 dwellings at the site was submitted in February 2024 (ref: 040102) and is expected to be determined at Planning Committee in 2024. Determination of the application is therefore well advanced.

A Statement of Common Ground has been prepared which includes a 'Deliverability Statement' that confirms an agreement between the Council and FCC Environment that the site is deliverable. This confirms that the site has proven to be viable, though not capable of withstanding a policy-compliant level of affordable housing and / or the full value of financial contributions requested in connection with the development.

***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?***

We welcome the text at paragraph 7.62 which references the opportunity for land at the wider Judkins Quarry to come forward for development within the plan period. However, the support for this wider site could be formalised if a greater supply of housing (relative to currently proposed provision) is needed over the plan period. The site is despoiled land and sustainably located, wholly within settlement boundary and well located in relation to Nuneaton town centre.

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