



Planning Policy & Economic Development  
Nuneaton & Bedworth Borough Council  
Town Hall  
Coton Road  
Nuneaton  
CV11 5AA

SENT BY E-MAIL AND POST

13<sup>th</sup> March 2017

Dear Sir / Madam

## **NUNEATON & BEDWORTH PRE SUBMISSION LOCAL PLAN CONSULTATION**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations and appear at future Examination Hearing Sessions to discuss these matters in greater detail.

### **Duty to Co-operate**

Under S110 of the Localism Act 2011 which introduced S33A into the 2004 Act the Council must co-operate with other prescribed bodies to maximise the effectiveness of plan making. The Duty to Co-operate requires the Council to "*engage constructively, actively and on an on-going basis*". The high level principles associated with the Duty are set out in the National Planning Policy Framework (NPPF) (paras 156, 178 – 181). In addition there are twenty three paragraphs in the National Planning Practice Guidance (NPPG) concerning the Duty. In considering if the Duty has been satisfied it is important to consider the outcomes arising from the process and the influence of these outcomes on the Local Plan. One required outcome is the delivery of full objectively assessed housing needs (OAHN) for market and affordable housing in a housing market area (HMA) as set out in the NPPF (para 47)

including the unmet needs of neighbouring authorities where it is reasonable to do so and consistent with sustainable development (NPPF para 182).

Nuneaton & Bedworth is part of the Coventry & Warwickshire HMA as such the Council has a role to play in the meeting of full OAHN across the HMA including any unmet needs arising from Coventry city. It is proposed that the city's unmet needs are met elsewhere within the Coventry & Warwickshire HMA.

The Coventry & Warwickshire HMA authorities (except Nuneaton & Bedworth Borough Council) have signed a Memorandum of Understanding containing a commitment to use their best endeavours to deliver housing numbers to meet in full an OAHN for HMA of 85,540 dwellings between 2011 – 2031 (or 88,160 dwellings if 2,620 dwellings for growth arising outside the HMA are included) as shown in a re-distribution Table. The proposed re-distribution is based on a mathematical calculation of the percentage of migration patterns / house moves and commuting patterns between Coventry city and its neighbouring authorities. The authorities are expected to prepare Local Plans that reflect these agreed housing numbers subject to the completion of SHLAA work. The Memorandum of Understanding will be reviewed as a result of co-operation with authorities outside the HMA and / or monitoring which identifies that housing needs in the HMA are not been met.

The Memorandum of Understanding includes a figure of 14,060 dwellings (703 dwellings per annum) for Nuneaton & Bedworth rather than the 13,374 dwellings as set out in the Pre Submission Local Plan. Therefore whilst the Pre Submission Nuneaton & Bedworth Local Plan as proposed makes some provision for unmet needs from Coventry there remains a deficit so OAHN in full will not be met in the Coventry & Warwickshire HMA. From the minutes of the latest (8<sup>th</sup> March 2017) Coventry & Warwickshire & South Leicestershire Joint Committee meeting it is understood that the Councils identified that 1,902 dwellings of Coventry's housing need is still unmet and there is no shared conclusion about the capacity of Nuneaton & Bedworth Borough to accommodate more of Coventry's unmet need. This is likely to mean other HMA authorities raising objections to the soundness of the Nuneaton & Bedworth Local Plan and possibly a failure to meet the Duty to Co-operate.

Although the HBF welcomes the proposals for a future move towards a statutory Plan for Coventry & Warwickshire in the meantime there remains a level of uncertainty about whether or not OAHN for Coventry & Warwickshire HMA will be met in full. Before the Local Plan is submitted for examination the Council together with the other Coventry & Warwickshire HMA authorities should provide an up dated Memorandum of Understanding dealing with this matter. Indeed by the time of the Nuneaton & Bedworth Local Plan Examination a Statement of Common Ground explaining cross boundary working as proposed in the recently published Housing White Paper "*Fixing The Broken Housing Market*" may also be required. If an updated Memorandum of Understanding and / or Statement of Common Ground are prepared the HBF may wish to submit further comments on the Council's legal compliance with the Duty and any implications for the soundness of the Local Plan in its Examination Hearing Statements.

## **OAHN and the Housing Requirement**

**Policy DS4 – Overall Development Needs** proposes a housing requirement of 13,374 dwellings (668 dwellings per annum) over the plan period 2011 – 2031. It is recommended that the housing requirement set out in **Policy DS4** is expressed as a minimum figure so that it is not treated as a ceiling to sustainable development. This housing requirement incorporates an OAHN for Nuneaton & Bedworth together with some unmet housing needs from Coventry calculated as follows :-

- 8,460 dwellings (423 dwellings per annum) based on Sub National Population Projections (SNPP) & Household Projections (SNHP) ;
- 9,920 dwellings (496 dwellings per annum) by the addition of 73 dwellings per annum to support economic growth ;
- 10,040 dwellings (502 dwellings per annum) by the addition of 6 dwellings per annum to improve affordability via an adjustment to household formation rates (HFR) in younger age groups ;
- 13,374 dwellings (668 dwellings per annum) by the inclusion of some unmet housing needs from Coventry.

In HBF representations submitted to the Examinations for the Stratford upon Avon, Warwick and Coventry Local Plans and the Rugby pre submission Local Plan consultation the appropriateness of a number of assumptions used in the calculation of OAHN for the Coventry & Warwickshire HMA as set out in the G L Hearn Reports have been questioned. These concerns are re-stated below :-

### No adjustments for longer term migration trends

The 2012 SNPP are underpinned by net migration over the short-term trend (5 years). This period 2007 – 2012 records a period largely represented by economic recession whereas a longer term 10 year trend covers a period of both economic boom and recession. In the Coventry & Warwickshire HMA the shorter period also covers a period during which housing development moratoriums were enforced across a number of authorities in the HMA. It is considered that the long-term (10 years) net-migration trend is more representative of demographic change within the HMA and therefore demographic-led housing need is better represented by the 10 year net migration trend. The sensitivity testing of 10 year migration trends in the 2015 SHMA shows a variation of +20% (5,040 dwellings per annum) but it is concluded that the 2012 SNPP figure of 4,197 dwellings per annum remains valid. The Local Plans Expert Group (LPEG) Report recommended in its proposed standard methodology for the calculation of OAHN that after sensitivity testing the higher of the 10 year and 5 year migration trend should be used. (Flowchart Step A in Appendix 6 of the LPEG Report). The HBF concurs with this approach which would sizably increase the demographic led housing need for the Coventry & Warwickshire HMA.

### Using HFR in younger age groups as a mechanism to improve affordability in response to market signals

It is agreed that an adjustment to HFR in younger age groups is appropriate (NPPG ID 2a-017-20140306) because although the 2012 SNHP draw upon long term trends since 1971 the methodology applied means there is a greater reliance upon trends experienced over the last 10 years rather than to those experienced over the longer term. The implication of this bias is that the latest SNHP continue to be affected by suppressed trends in HFRs associated with the impacts of the economic downturn, constrained mortgage finance, past housing undersupply and the preceding period of increasing unaffordability which particularly affected younger households. Therefore SNHP continue to project forward a deterioration of HFR in younger age groups despite evidence to show that HFR for these groups are likely to recover as the economy improves (Town & Country Planning Tomorrow Series Paper 16, *"New estimates of housing demand and need in England, 2001 to 2031"* by Alan Holman). However in the case of the Coventry & Warwickshire HMA the applied uplifts based on a return of HFR to 2001 levels by 2025 in the 25-34 age group are overly modest representing only 2% uplift in the HMA and 1.4% in Nuneaton & Bedworth.

The NPPG confirms that worsening trends in market signals should be considered which may necessitate an upward adjustment above demographic projections (ID 2a-018-20140306 & 2a-019-20140306). The NPPG is explicit in stating that a worsening trend in any one of the market signal indicators will require an upward adjustment to planned housing numbers (ID : 2a-020-20140306). However the impact of using HFR adjustment as a mechanism to respond to market signals in order to improve affordability is not considered to properly account for either demographic change or identified worsening market signals. The LPEG Report standard methodology recommended separate adjustments to both HFR in younger age groups and for worsening market signals (Flowchart Steps A & B in Appendix 6 of LPEG Report). Indeed the recommended adjustment of 50% of the difference between 2008 and 2012 HFR in younger age groups (25 – 44 years old) occurs at the beginning of the assessment in the same way as any migration adjustment in order to establish the demographic starting point before any further uplifts to support economic growth and / or worsening market signals are applied.

By way of comparison to the 2% uplift in the Coventry & Warwickshire HMA and 1.4% in Nuneaton & Bedworth, in the Eastleigh Local Plan Inspector's Preliminary Conclusions on Housing Need a 10% uplift was proposed as a cautious approach to modest pressures on market signals whilst the Uttlesford Local Plan Inspector's Conclusions found an overall increase of 10% was appropriate to achieve the objective of improving affordability. The LPEG Report recommends an uplift of up to 25% dependant on house price and rental affordability ratios (text in Appendix 6 of LPEG Report).

#### No increase to help deliver affordable housing

The Affordable Housing Background Paper prepared by GL Hearn dated April 2016 identified a need for 183 affordable dwellings per annum in Nuneaton & Bedworth (assuming 30% of household income is spent on cost of housing) which represents 36% of OAHN in the Borough. The Housing

White Paper is critical of a housing market in which households are spending this proportion of income on the cost of housing. If households are assumed to spend less than 30% (25%) of household income on the cost of housing then affordable housing need increases to 298 dwellings per annum or 59% of OAHN for Nuneaton & Bedworth. In Coventry affordable housing need is calculated as 600 dwellings per annum representing 28% of OAHN in the city. However viability constraints on development in both Nuneaton & Bedworth and Coventry mean affordable housing delivery will be 20 – 25% in Nuneaton & Bedworth and less than 28% in Coventry so a higher proportion of Coventry's unmet needs are for affordable housing. However a higher affordable housing provision in Nuneaton & Bedworth to meet this unmet affordable housing need is also unviable. Therefore it is inevitable that a significant proportion of affordable housing needs will remain unmet.

It is known that Warwick District Council and Coventry City Council have prepared and signed an Affordable Housing Statement of Common Ground dealing with the complex relationship of meeting and delivering affordable housing needs by a re-distribution of unmet needs from one authority to another. It is suggested that a similar document is may be required between Nuneaton & Bedworth Borough Council and Coventry City Council.

It is suggested that insufficient consideration to increasing housing supply to help support delivery of affordable housing was undertaken. As set out in the NPPG an increase in the total housing provision included in a Plan should be considered where it could help to deliver the required number of affordable homes (ID : 2a-029-20140306). The 2015 SHMA also concluded that some adjustments might be appropriate for additional needs arising from concealed and homeless households (para 6.59 & 6.76) but no uplift was applied.

Again by way of comparison it is known that other Local Plans have included significant uplifts to meet affordable housing needs in Canterbury there is an uplift of 30% (paragraphs 20, 25 & 26 Canterbury Local Plan Inspectors Note on main outcomes of Stage 1 Hearings dated 7 August 2015) and in Bath & North East Somerset there is an increase of 44% (paragraphs 77 & 78 BANES Core Strategy Final report 24 June 2014). Most recently the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy Inspector's Interim Conclusions propose a 5% uplift to help deliver affordable housing needs. The Forest of Dean Inspector is also suggesting a 10% uplift in his Interim Findings *"to seek to deliver all of the identified affordable housing need as a proportion of market housing would result in unrealistic and undeliverable allocations. But it does not necessarily follow that some increased provision could not be achieved ...I consider that an uplift of 10%, which has been found reasonable in other plan examinations, would be more appropriate here"* (para 63). The LPEG Report recommends significant uplifts to meet in full OAHN for affordable housing (Flowchart Steps C & D in Appendix 6 of LPEG Report).

Misalignment of economic growth forecasting timeframes and the two stage re-distribution of unmet needs from Coventry to support economic growth elsewhere

There is no justification for assessing employment growth for the period 2014 – 2031 only rather than the full period of 2011 – 2031. The resultant effect is to lower the level of job growth by discounting levels of employment growth between 2011 and 2014 which in turn suppresses the level of economic led housing growth.

The 2015 SHMA concludes that in some parts of the HMA “*trend based demographic projections do not support growth in the workforce as strongly ... increase to support economic growth*” (para 7.15). The re-distribution of unmet needs from Coventry to North Warwickshire, Nuneaton & Bedworth and Stratford upon Avon to support economic growth was extensively discussed during the Stratford upon Avon Local Plan Examination (see Inspector’s Final Report paras 57 – 60 & 62). This debate focused on concerns that “*the economic led projection is needed to meet the level of jobs created and so meets the needs of the District. Nevertheless it is reasonable to say a very modest component of the OAHN would contribute to the unmet needs of others*” therefore “*it should not be based on an incorrect assumption that everything over and above the demographic need is surplus and available to meet the needs of others*”. Since only a small proportion of such adjustments should be attributed to meeting unmet needs the assumption in the 2015 SHMA suppresses the OAHN for the HMA by up to 189 dwellings per annum.

#### Publication of 2014 SNPP & SNHP

It is understood that the 2014 SNPP show stronger population growth in Coventry but lower growth in Warwickshire than previously estimated. However overall household growth in the 2014 SNHP is lower because of differences in the demographic structure resulting in a need for 4,167 dwellings per annum across the HMA over the plan period, which is 1% lower than 4,197 dwellings per annum in the 2015 Updated Assessment of Housing Needs. The outcome of discussions between the HMA authorities is that a 1% difference is minimal. The new data is not sufficiently significant to render the 2015 Updated Assessment of Housing Needs out of date (NPPG ID 2a-016-20140306) and the Memorandum of Understanding continues to provide a robust and effective agreement. The Councils also recognise that any detailed review of OAHN would result in an even greater shortfall of housing in Coventry and the need for this additional shortfall to be redistributed back to the Warwickshire authorities. In this context, it is likely that the outcome would be very similar to the housing requirements set out in the Memorandum of Understanding.

The HBF concur with the findings of the 2016 update Report. It is noted that the Coventry & Warwickshire HMA authorities opinion that less than 1% (0.7%) is an insignificant change by inference supports the HBF’s argument that an uplift of less than 2% (1.7%) to improve affordability across the HMA should also be considered insignificant.

In conclusion the HBF consider that the SNHP plus adjustments for 10 year migration trends and HFR in age group 25 – 34 multiplied by a vacancy rate allowance would have provided a more appropriate demographic starting

point for the calculation of OAHN which should have been further uplifted for economic growth and / or market signals. It is acknowledged that adjustments for economic growth and market signals are not mutually exclusive so both may not necessarily be needed. It is known that an alternative OAHN prepared by Barton Willmore on behalf of a consortium of developers estimates the OAHN for the Coventry & Warwickshire HMA for 2011 – 2031 as between 100,200 – 126,000 dwellings (5,010 – 6,300 dwellings per annum). If this alternative OAHN is correct then the OAHN for the HMA has been under represented by circa 17% - 34%. It is noted that the Housing White Paper points out that some Councils are not undertaking an honest assessment of housing needs and Plans are not providing enough land to meet these needs with Councils putting off difficult decisions. As a solution the Housing White Paper proposes a standard methodology for the assessment of housing needs / housing requirement. The Council should give consideration to the implications of this proposal. By the time of the Nuneaton & Bedworth Local Plan Examination it may be necessary for the Council to prepare an assessment of its housing needs based on this standard methodology especially given that from April 2018 this is the baseline against which the Council's 5 YHLS and Housing Delivery Test will be calculated in the absence of an up to date Local Plan (defined as a Plan that is less than 5 years old). When this information is available the HBF may wish to submit further comments on OAHN and the Council's housing requirement in its Examination Hearing Statements.

## **Housing Land Supply (HLS)**

**Policy DS2 – Settlement Hierarchy & Roles** identifies a settlement hierarchy of Nuneaton, Bedworth, Bulkington, Keresley and Ash Green / Neals Green. Most development will be directed to Nuneaton. Under **Policy DS7 – Green Belt** thirteen sites are removed from the Green Belt. **Policy DS5 – Residential Allocations** proposes eleven strategic and twenty four non-strategic housing site allocations.

The Council's overall HLS is calculated as 13,374 dwellings comprising of strategic allocations for 8,851 dwellings, non-strategic allocations for 940 dwellings, completions since 2011 of 1,318 dwellings, existing planning consents for 2,144 dwellings and a windfall allowance of 121 dwellings. The overall HLS against a housing requirement of 13,374 dwellings provides no contingency or flexibility for unforeseen circumstances. The HBF would recommend as large a contingency as possible for both the 5 YHLS and overall HLS especially given that the housing requirement is a minimum not a maximum figure. The HBF always suggests a 20% contingency to provide sufficient flexibility for unforeseen circumstances. Indeed the Department of Communities & Local Government (DCLG) presentation slide from the HBF Planning Conference in September 2015 illustrated a 10 – 20% non-implementation gap together with a 15 – 20% lapse rate. The slide emphasised *“the need to plan for permissions on more units than the housing start / completions ambition”* (see below).

The LPEG Report also recommended that *“the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but*

also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF” (para 11.4 of the LPEG Report).



Department for  
Communities and  
Local Government

In recent years there has been a 30-40% gap  
between permissions and housing starts

- **Gap of around 30-40%** between the number of permissions given for housing and starts on site within a year. Estimate that for a year's permissions for housing around:

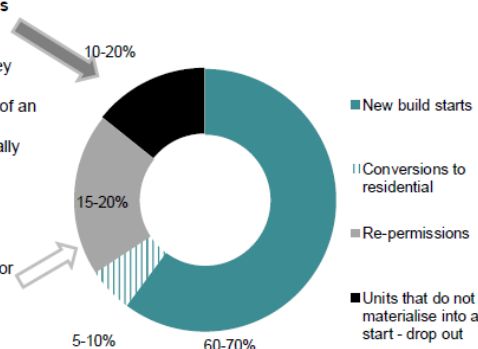
- **10-20%** do not materialise into a start; the permission **'drops out'**: this could be because -

- the landowner cannot get the price for the site that they want
- a developer cannot secure finance or meet the terms of an option
- the development is later not considered to be financially worthwhile
- there are supply chain constraints hindering a start.

There may be scope to reduce this through policy.

- **15-20%** are not abandoned but a **re-permission** is sought, for example to make a major change to plans or to extend the development period.

- Recent data and realities of private market suggests need to **plan for permissions on more units than housing start/completion ambition.**



Extract from slide presentation “DCLG Planning Update” by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

Currently as set out in the Council’s 5 YHLS Position Statement April 2016 there is not a 5 YHLS. The HBF agree that the Council has under supplied therefore the use of a 20% buffer is appropriate. The HBF’s preferred approach to shortfalls is Sedgefield as set out in the NPPG. The 5 YHLS should be calculated on the annualised housing requirement and the 20% buffer should be added to both the annualised requirement and the shortfall. If there is not reasonable certainty that the Council has a 5 YHLS on adoption of the Local Plan then the Plan cannot be sound as it would be neither effective nor consistent with national policy. If the Plan is not to be out of date on adoption it is critical that a 5 YHLS is achieved otherwise *“relevant policies for the supply of housing will not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites”* (NPPF para 49).

The HBF do not comment on the merits or otherwise of individual sites therefore our representation is submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the Council’s HLS. Under the Housing White Paper’s proposals from November 2017 the Council will also be subject to the Housing Delivery Test. Therefore it is essential that the Council’s assumptions on lead-in times, lapse rates and delivery rates for sites in the HLS are realistic. These assumptions should be supported by parties responsible for delivery of housing and sense checked by the Council using historical empirical data and local knowledge.



For the Council to produce a sound Plan the Council should be considering the allocation of more sites. When allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.

### **Viability and Policy Requirements including Affordable Housing**

Under **Policy H2 – Affordable Housing** the Council proposes to negotiate on sites of more than 15 dwellings 25% affordable housing provision and on sites of 11 – 15 dwellings 20% affordable housing provision subject to viability.

If the Nuneaton & Bedworth Local Plan is to be compliant with national policy, the Council must satisfy the NPPF requirements (paras 173 & 174) whereby development should not be subject to such a scale of obligations and policy burdens that viability is threatened. The residual land value model is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on viability. Therefore it is important that the Council understands and tests the influence of all inputs on the residual land value as this determines whether or not land is released for development. The Harman Report highlighted that *“what ultimately matters for housing delivery is whether the value received by land owners is sufficient to persuade him or her to sell their land for development”*.

The Council should evidence the proportion of its proposed HLS is located in each Value Level area. The Local Plan Viability Assessment Update December 2016 prepared by Dixon Searle Partnerships shows that policy compliant residential developments are unviable in Value Levels 1 and 2 and only viable in Value Levels 3 and 4. The viability of development on smaller previously developed land situated in the main urban areas of the Borough is of particular concern. The Council should not set unachievable policy obligations on such sites. It is unreasonable to expect to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. Therefore site by site negotiations should occur occasionally rather than routinely.

Before the Local Plan is submitted for examination the Council should review its references to Starter Homes. The proposals set out in the Housing White Paper indicate that the previously anticipated mandatory requirement that 20% of affordable housing must be provided as Starter Homes is no longer the case. Instead it is proposed that Local Authorities deliver Starter Homes as part of a mixed package of affordable housing alongside other affordable home ownership and rented tenures determining the appropriate level of provision for the locality in agreement with developers (Housing White Paper paras 4.16 & 4.17).

## Other Policies

**Policy NE2 – Open Space** it is not the responsibility of new development to address existing deficiencies. This requirement should be deleted from Policy NE2.

The reference to Building for Life 12 in **Policy BE3 – Sustainable Design & Construction** should be removed to the supporting text. The HBF is supportive of the use of Building for Life 12 as best practice guidance to assist Local Planning Authorities, local communities and developers assess new housing schemes but it should not be included as a Local Plan policy requirement which obliges developers to use this tool. The use of Building for Life 12 should remain voluntary. The reference to Secure By Design should also be removed to the supporting text for the same reasons.

**Policy BE3** also proposes a requirement for 35% of dwellings to be built to M4(2) accessible and adaptable standards. The Written Ministerial Statement dated 25<sup>th</sup> March 2015 stated that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*. If the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the NPPG. It is incumbent on the Council to provide a local assessment evidencing the specific case for Nuneaton & Bedworth which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. If it had been the Government’s intention that generic statements justified adoption of the higher optional accessible and adaptable homes standards then the logical solution would have been to incorporate the standards as mandatory via the Building Regulations which the Government has not done.

Similarly if the Council wishes to adopt the higher optional standard for water efficiency the Council should only do so by applying the criteria set out in the NPPG. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The NPPG (ID 56-013-20150327 to 56-017-20150327) refers to *“helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand”*. The 2016 Water Cycle Study update concludes that there will be sufficient supply to meet the planned growth across the sub-region for the plan period. Nuneaton & Bedworth is not water stress area therefore this requirement should be deleted.

The Supplementary Planning Document (SPD) proposed in **Policy BE3** will not be subject to the same process of preparation, consultation and examination as the Local Plan. The Regulations require that policies intended to guide the determination of applications for planning permission should be in the Local Plan and not inappropriately hidden in an SPD. The NPPF also indicates that SPDs should not add to the financial burden of development (para 154) and policies on local standards should be in the Plan (para 174).

## Conclusions

For the Nuneaton & Bedworth Local Plan to be found sound under the four tests of soundness as defined by the NPPF (para 182) the Plan should be positively prepared, justified, effective and consistent with national policy. The Pre Submission Local Plan is unsound because of :-

- an under estimation of OAHN ;
- not meeting full OAHN in the Coventry & Warwickshire HMA because Nuneaton & Bedworth is failing in its role to assist in meeting unmet housing needs from Coventry ;
- no contingency in overall HLS and no 5 YHLS on adoption ;
- unviable affordable housing policy in lower value areas (Value Levels 1 & 2) ;
- unjustified policy requirements for higher optional housing standards.

Therefore the Plan is inconsistent with national policy. It is not positively prepared nor justified so it will ultimately be ineffective. It is hoped that these representations are of assistance to the Council in informing the next stages of the Nuneaton & Bedworth Local Plan. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



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