

Nuneaton & Bedworth Borough Council  
Planning Policy Consultation  
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SENT BY E-MAIL ONLY TO  
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3<sup>rd</sup> December 2018

Dear Sir / Madam

## **NUNEATON & BEDWORTH LOCAL PLAN MAIN MODIFICATIONS 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. The HBF submits the following representations on particular Main Modifications (**MM**) proposed by the Council.

### **MMC4 - MM14**

**MM13** introduces a stepped housing trajectory of 502 dwellings per annum between 2011 – 2018 and 868 dwellings per annum thereafter. This stepped housing trajectory is justified by the Council on the basis of expected delivery rates from Green Belt release sites and Sustainable Urban Extensions (SUE).

A 20% buffer is applicable to the Council's 5 YHLS calculation as a backlog of 1,132 dwellings has accrued since 2011. Under **MM14** the Council's 5 YHLS is calculated as 5.5 years using a 20% buffer, the stepped housing trajectory set out in **MM13** and a Liverpool approach to recouping shortfalls.

The HBF would argue that if the stepped housing trajectory is to be accepted then post adoption of the Local Plan any shortfalls in delivery measured against the stepped trajectory should be recouped on a Sedgefield rather than Liverpool approach. Any further delays in meeting housing needs measured against the stepped trajectory is failing those households who need homes. It is important to remember that this is not just a theoretical mathematical numbers exercise



but represent actual households in housing need today so it is unreasonable and unequitable to expect them to wait until later in the plan period before their current housing needs are addressed. The use of a stepped housing trajectory and a Liverpool approach post adoption of the Local Plan would represent a two staged deferment of housing delivery contrary to the Government's overriding objective to significantly boost housing supply.

## **Conclusion**

For the Nuneaton & Bedworth Local Plan to be found sound under the four tests of soundness as defined by the NPPF the Plan should be positively prepared, justified, effective and consistent with national policy. It is considered that **MM14** is unsound because it is inconsistent with national policy, not positively prepared, unjustified and ineffective. It is hoped that this representation is of assistance to the Council and the Inspector in preparing the final stage 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**



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**