

Savills on behalf of Arbury Estate

Respondent ID: 106

Matter - 3 Housing

Issue 1: The approach to the housing requirement

37. 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?

The housing requirement figure is not soundly based. It does not appear to take into account an uplift related to affordable housing, as required by PPG Paragraph: 024 Reference ID: 2a-024-20190220.

Policy DS3 states that the housing requirement for NBBC is: 9,810 homes based on 545 dwellings per annum. This is based on the conclusions drawn from "Towards a Housing Requirement for Nuneaton & Bedworth, November 2022".

It is discussed at section 5 of the report how the 545 per annum number takes affordable housing need into consideration. Although it is stated that affordable housing is considered, it is not explicitly justified how, and what number of affordable housing units are accounted for. Paragraph 5.15 makes reference to the affordable housing need being 407 dpa.

Paragraph 5.16 makes the point that if 25% of new homes were delivered as affordable homes in accordance with the Council's emerging affordable housing policy, 1,628 dpa overall would be required to meet the Borough's affordable need in full. Paragraph 5.17 states that viability evidence shows that this is not realistic and would not support higher delivery as a percentage of overall housing provision. However adequate consideration has not been given to providing any uplift for affordable housing.

Although an increase in the percentage of affordable housing relative to market housing required on sites is rightly seen to raise viability concerns, there is potential to increase the overall housing requirement. This would allow for the provision of affordable housing as part this, alongside and increased level of market housing in order to address supply side issues.

It should also be considered that the housing requirement is likely to be higher than the 545 per annum figure quoted by the Council should future discussions with the Coventry and Warwickshire HMA authorities suggests that a larger housing requirement is required in order to contribute towards potential unmet needs. Therefore a combination of unmet need being likely to increase the requirement alongside affordable housing, there is a clear rationale for a reassessment of the Borough's housing requirement, to ensure it is suitably justified, as required by paragraph 35 of the NPPF.