



Nuneaton & Bedworth Borough Plan Review Examination

Matter 3: Housing

June 2024



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MATTER 3: HOUSING

Issue 1: The approach to the housing requirement.

Q37. 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?

1.1.1 No.

1.1.2 As set out in detail in our Regulation 19 representation and our Matter 2 Hearing Statement¹, we are firmly of the opinion that the proposed housing requirement as set out in Policy DS3 is not positively prepared, justified, effective or consistent with national policy. It is not sound.

1.1.3 Without wishing to repeat comments in previous submissions, our concerns can be summarised as follows:

- There is a substantial unmet housing need arising from Coventry City Council up to 2041. Despite NBBC having accepted a responsibility to accommodate some of Coventry's unmet need in the adopted Borough Plan, the submitted Plan is silent on this critical issue.
- Based on evidence prepared by Lichfield's and submitted to this examination, the unaccounted-for shortfall is likely to be in the magnitude of c.14,100 and c.39,780 much needed new homes.
- This evidence further demonstrates that the apportionment to Nuneaton & Bedworth, based upon its strong functional relationship with Coventry, would be between c.5,650 and c.15,910 dwellings.

¹ Supported by the detailed evidence set out in Lichfield's Hearing Statements.

- It is critical that the Council makes an appropriate contribution towards assisting in addressing this unmet housing though this Plan as these needs are extremely acute.

1.1.4 Ultimately not tackling this critical issue now is wholly inappropriate and in direct conflict with the provisions of the NPPF. The NPPF makes clear that strategic policies should *"provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas"*² and that Local Plans should be based on *"effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred"*³. Coventry has unmet needs arising now and these must be addressed now. A Plan that does not make provision for meeting an appropriate proportion of these unmet needs over the plan-period is simply not sound.

1.1.5 In addition, we object to the notion that the currently proposed economic uplift above the minimum amount of housing required by the Standard Method could serve the dual function of also meeting any unmet housing needs⁴. As set in the Matter 2 Statements submitted by Lichfield's such an approach would be unjustified and in conflict with the requirements of the NPPF.

1.1.6 Deferring addressing these needs to a subsequent review of this Plan would not be positive, proactive or pro-growth, and would likely take several years to materialise and could still not result in an agreed distribution. However, in the event that the Plan proceeds on the basis that the critical issue of addressing unmet housing need is postponed, it will be essential to modify Policy DS8 such that it provides an explicit trigger related to Coventry City declaring unmet housing needs.

1.1.7 The acute unmet housing needs within the C&WHMA necessitates that any time-period for review must be streamlined and made as short as is practicable, and also

² NPPF (September 2023) Paragraph 11(b)

³ NPPF (September 2023), Paragraph 35(c)

⁴ NBBC alluded to this possibility at paragraph 2.21 of CD15: Development Needs and Supply Background Paper (2024).

have a commitment that the Council will consider policies out-of-date should the review not be completed by a certain point. In this regard, we consider the provision of an additional trigger requiring the Plan to be reviewed within 12-24 months of adoption to address the C&WHMA's unmet housing needs would be entirely appropriate and boost the effectiveness of the Plan.

- 1.1.8 Gladman further note that a modification of this nature would align with the Council's proposed minor modification to Policy DS8 (CD18, mm36 and mm37) where it has now explicitly referred to the need to meet the strategic, cross-boundary, employment land needs via a local plan review.
- 1.1.9 Gladman will provide further commentary on Policy DS8 in the final block of Hearing sessions scheduled for October 2024 once MIQs are issued for these sessions.