



Nuneaton & Bedworth Borough Plan Review Examination

Matter 3 (Block 3): Housing

August 2024



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MATTER 3 (BLOCK 3): HOUSING

Issue 2: The five year supply and overall housing supply position

Q39b. 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?

- 1.1.1 Our response to Question 39b is made without prejudice to our previous Hearing Statements in respect of Matters 1 and 2 which demonstrated that the proposed housing requirement of 9,810 homes based on 545 dwellings per annum (dpa) is not positively prepared, justified, effective or consistent with national policy.
- 1.1.2 Gladman are firmly of the view that the oversupply factor utilised in the updated five-year housing land supply position is not justified and should not be endorsed for future five-year housing land supply calculations over the lifetime of the Plan.
- 1.1.3 Currently, oversupply remains a question of planning judgement which is not addressed by the September 2023 NPPF, which this Plan is being examined against, nor is any methodology provided in national planning guidance. The PPG has provisions for one particular set of circumstances where there has been both an oversupply and an undersupply in previous years, permitting them to be offset one against the other¹, but not for the general proposition that past oversupply should always be taken into account.
- 1.1.4 Policy DS3 as drafted sets out, inter alia, a minimum requirement of 9,810 homes based on 545dpa. Setting a residual annual requirement of 458dpa as proposed in Figure 1 of CD31 would be inconsistent with this part of the policy. Moreover, the difficulty with this methodology is that it results in the plan requirement becoming a target. However, it is not. It is the minimum figure needed to ensure sufficient housing to meet the needs of the borough and improve affordability. This approach therefore

¹ Paragraph: 032 Reference ID: 68-032-20190722

conflicts with the national objective of significantly boosting the supply of housing as set out within the Framework².

1.1.5 In forming a view on the oversupply factor, we would also draw to the Inspector's attention the Written Ministerial Statement (WMS) given by the Deputy Prime Minister, and Secretary of State for Housing, Communities and Local Government, Angela Rayner on 30 July 2024, in addition to the ongoing consultation on proposed revisions to the Framework and other changes to the planning system. These are now material consideration for this examination and clearly set the tone and direction of travel of the newly elected Government in their approach to national planning policy.

1.1.6 Of relevance to the matter of oversupply is the clear tone in the WMS to the Government's commitment to improving affordability, turbocharging growth and building the 1.5 million homes they have committed to deliver over the next five years. The WMS reaffirms that the country is in *"the most acute housing crisis in living memory."*

1.1.7 In addition to the WMS the consultation on proposed reforms to the National Planning Policy Framework and other changes to the planning system sets out³:

*"20. We are also proposing to remove the wording on past oversupply in paragraph 77⁴, which was introduced to set out that previous over-supply could be set against upcoming supply. **Given the chronic need for housing we see in all areas, we should celebrate strong delivery records without diluting future ambitions** (emphasis added).*

21. These changes will be pro-supply measures, ensuring a pipeline of deliverable sites is maintained at all times."

1.1.8 In light of the above, Gladman contend that the use of oversupply to artificially suppress the Council's five-year housing land supply requirement(s) runs in conflict

² Paragraph 60 September 2023 NPPF

³ MHCLG - Open consultation: Proposed reforms to the National Planning Policy Framework and other changes to the planning system. Updated 2 August 2024

⁴ Of the December 2023 NPPF

with paragraph 60 of the September 2023 Framework, Government policy as established in the recent WMS and the clear direction of travel as detailed in the ongoing consultation on the proposed changes to the Framework. Consequently, the use of oversupply in calculating the five-year housing land supply position is not justified.

- 1.1.9 The Council's methodology regarding oversupply must also be considered in the context of the proposed new stock-based Standard Method for calculating local housing need. Whilst only indicative at this stage it nonetheless establishes for Nuneaton & Bedworth a revised local housing need of 774dpa, some 229dpa higher than the proposed housing requirement of 545dpa. Whilst we will discuss the implications of this further in our Matter 7 Hearing Statement it points to housing need in the borough being significantly higher than the levels of housing the Council will deliver across the plan-period, particularly if oversupply from previous years is offset against future housing needs.