

Written Statement 3

Nuneaton and Bedworth Borough Local Plan Review Examination

ON BEHALF OF CEG

June 2024

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1. 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 Strategic Policy DS3 – Overall Development Needs states that Nuneaton and Bedworth Borough will make provision for a minimum of 9,810 dwellings between 2021 and 2039. However, the policy, and the plan as a whole, does not make any provision (or include a suitable policy mechanism) to contribute to meeting any of Coventry's unmet need. Consequently, policy DS3 is not considered to be soundly based.
- 1.2 The 9,810 dwellings set out within the policy equates to an annual requirement of 545 dwellings each year which is set out within the Towards a Housing Requirement report (THA- ref EB8). This report notes, at para 6.1, that the HEDNA (EB7.1) suggests a figure of 409 dwellings per annum in the Nuneaton and Bedworth area. Para 6.1 of the report also notes that the figure of 409 dwellings per annum is considerably less than the 646 dwellings per annum that is set out within in the Nuneaton and Bedworth HEDNA (EB6) prepared in May 2022 which covered all the authorities within the Coventry and Warwickshire Housing Market Area.
- 1.3 This THA report recommends the provision of a housing target of around 545 dpa as necessary to positively support economic growth, the sustainable regeneration of the Borough's Town Centres, and the delivery of affordable housing. However, again, this figure is identified without any clarity on the extent of unmet need arising from Coventry City and whether any uplift is therefore necessary.
- 1.4 Para 5.4 of the THA (EB8) report also explains that the need for affordable housing is high relative to the overall housing need in Nuneaton & Bedworth at 407 dpa, this is likely to require higher levels of open-market housing as the primary delivery mechanism. This high level of affordable housing need within the Borough justifies additional housing over and above the locally assessed housing need level. Therefore, we consider that the 545 dwellings per annum requirement does not go far enough. The Council will inevitably need to plan for a higher figure due to affordability issues regardless of the contribution they may need to make to help to address Coventry's anticipated unmet needs.
- 1.5 As noted in response to Matter 1, there are fundamental issues with the approach taken in the emerging Coventry Local Plan review and its level of housing need, which does not currently plan for the 35% uplift established under the standard method without any clear justification. The knock on effect of Coventry seeking to arbitrarily reduce its requirement is that it could artificially reduce the level of unmet need, therefore raising considerable concerns that the housing requirement for Nuneaton and Bedworth is potentially unsound.
- 1.6 A sound approach consists of Coventry City Council confirming their housing requirement, based on the standard method, from which their unmet need can be calculated, based on clear evidence. This can then inform an appropriate high-level spatial distribution amongst neighbouring authorities as part of an updated MoU.

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