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Towards a Housing Requirement for Nuneaton & Bedworth

Final Report

Iceni Projects Limited on behalf of Nuneaton &
Bedworth Borough Council

November 2022

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ON BEHALF OF NUNEATON
& BEDWORTH BOROUGH
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Towards a Housing Requirement for
Nuneaton & Bedworth

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1. INTRODUCTION AND SCOPE

- 1.1 Nuneaton and Bedworth Borough Council has commissioned Icen Projects (“Icen”) to prepare this report, which considers and draws together factors relevant to setting a housing requirement and policies for employment land provision for Nuneaton & Bedworth Borough within the emerging Borough Plan Review. The next stage of the plan preparation process is the publication of a draft Plan for consultation.
- 1.2 This report is intended to supplement and be read alongside the findings of the Coventry and Warwickshire Housing and Economic Development Needs Assessments, published in October 2022 (“the Sub-Regional HEDNA”). It also takes into account findings of the draft Nuneaton and Bedworth HEDNA, published in May 2022.
- 1.3 The report has specifically been written alongside the Sub-Regional HEDNA and is intended to be read alongside it, providing more specific consideration of housing and employment need in Nuneaton & Bedworth Borough and relevant local considerations which need to be taken into account in setting a housing and employment target.
- 1.4 The report considers the evidence of objectively assessed housing need set out within the HEDNAs alongside other considerations which may influence the Council’s decision on an appropriate housing and employment requirement, including:
- The vision and objectives for the Borough articulated in the emerging Borough Plan Review;
 - Affordable housing need in the Borough and the delivery of affordable housing, which is influenced by the overall housing provision and development viability;
 - Alignment of the emerging Plan’s housing and economic strategy, which is an important consideration in achieving sustainable growth and regeneration;
 - Potential issues of unmet housing need from other parts of the Housing Market Area and major employment-generating development on the edge of the borough / close to it;
 - Infrastructure requirements to facilitate development; and
 - The levelling up agenda to ensure opportunity for the north of the County.
- 1.5 Paragraph 60 of the National Planning Policy Framework (NPPF) sets out the Government’s objective of significantly boosting the supply of homes. Para 11b outlines that strategic policies within local plans should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas where it is sustainable to do so.

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- 1.6 The NPPF is clear that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth (Para 82a) and that plans should be prepared positively and be aspirational, albeit where this is consistent with achieving sustainable development (Para 16).
- 1.7 Paragraph 19 identifies that the planning system should do everything it can to support sustainable economic growth. Paragraph 158, in the context of plan-making, outlines that local authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and take full account of relevant market and economic signals.
- 1.8 For the purposes of assessing housing need, the NPPF and Planning Practice Guidance (PPG)¹ need to be read together. The PPG makes clear that housing need is an ‘unconstrained’ assessment of the number of homes needed in an area which should be assessed separately from and before consideration is given to land availability, establishing a housing requirement figure and preparing policies to address this such as housing allocations.² It clearly identifies that a minimum assessment of housing need and a housing requirement may be different to one another.
- 1.9 The PPG outlines that it expects the standard method to be used by planning authorities to assess housing need, but clearly states in Para 2a-002 that “*the standard method ... identifies a minimum annual housing need figure. It does not produce a housing requirement figure.*” NPPF Para 61 is similarly clear that the standard method can be used to define the minimum number of homes needed. It sets out:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

- 1.10 The NPPF therefore recognises that there may be an alternative approach to the standard method which is applicable in some circumstances. Para 2a-015 in the PPG is particularly relevant to

¹ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

² PPG ID: 2a-001-20190220

interpreting Para 61. It identifies the need to demonstrate 'exceptional local circumstances' when using an alternative approach which results in a lower housing need figure than that identified using the standard method. However it sets out the following in respect of figures that are higher than the standard method:

Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

- 1.11 The Planning Practice Guidance also identifies in Para 2a-010³ a range of circumstances and considerations which are relevant to considering whether it is appropriate to plan for a higher housing need figure than the standard method. This is replicated below.

When might it be appropriate to plan for a higher housing need figure than the standard method indicates?

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);

³ PPG ID: 2a-010-20201216

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- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
 - an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.

- 1.15 The PPG confirms in these terms the support in national policy for authorities who set a housing requirement above the standard method. It identifies a range of potential considerations in doing so including historical housing delivery and issues associated with economic growth/performance.
- 1.16 This report interrogates these issues, alongside the evidence set out in the HEDNAs, drawing them together to provide advice on setting a housing requirement as part of the Nuneaton & Bedworth Borough Plan Review. It also considers issues associated with the appropriate level of employment taking into account the need to meet both local needs and contribute to the sub-regional need identified in the HEDNA for strategic B8 warehousing/ logistics development.

2. REVIEW OF EXISTING EVIDENCE

- 2.1 This section of the report reviews the current Borough Plan housing requirement as well as existing evidence relating to housing and employment needs in Nuneaton & Bedworth Borough.

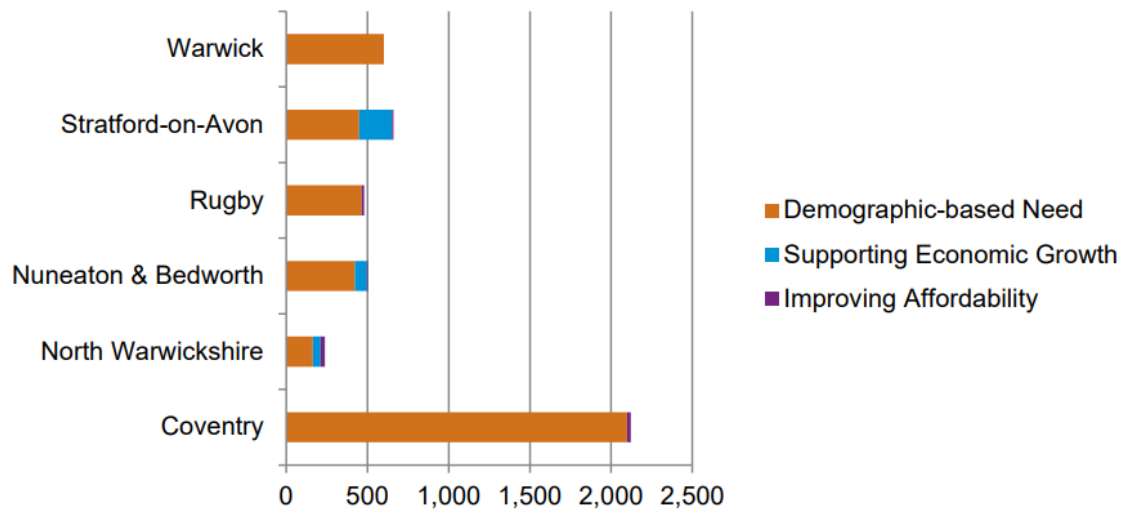
Nuneaton & Bedworth adopted Local Plan

Housing

- 2.2 The adopted Nuneaton & Bedworth Local Plan⁴ (June 2019) sets out an overall development need of 14,060 new homes over the plan period (2011 – 2031) in Policy DS4. This is based on an overall assessment of need (OAN) for housing in the Borough of 10,040 new homes (502 dpa), along with the additional 4,020 new homes which forms the Borough's contribution to assisting Coventry City Council in meeting their unmet housing need over the plan period and was agreed in co-operation with the other Warwickshire districts.
- 2.3 Nuneaton & Bedworth sits within the wider Coventry and Warwickshire Housing Market Area (HMA) and the figure of 502 dpa over the plan period was established by the Updated Assessment of Housing Need: Coventry and Warwickshire HMA, published in September 2015 (also referred to as the Updated Assessment of Housing Need in the Nuneaton & Bedworth adopted Local Plan). The 502 dpa figure of need is made up of three components: a demographic based need for 423 dpa, with an uplift of 73 dpa to support economic growth, and an additional uplift of 6 dpa through adjustments to household formation rates to support improving affordability. The demographic component of the 2015 Updated Assessment of Housing Need reflects 2012-based Office for National Statistics (ONS) subnational population projections and CLG household projections.

⁴ [Nuneaton & Bedworth Local Plan, June 2019.](#)

Figure 3.1 Coventry and Warwickshire Overall need for housing per annum 2011 - 2031



Source: Updated Assessment of Housing Need: Coventry-Warwickshire HMA, September 2015.

2.4 A subsequent HMA report (referred to as the ‘JGC report’ in the adopted Local Plan) identified a slight change at the individual authority level using 2014-based household projections. The report concluded that the overall objectively assessed need for the HMA remained consistent between the 2012 and 2014 projections. Therefore, the local authorities within the HMA collectively took the decision to continue using the 2015 updated assessment to inform their Local Plans, an approach that was considered sound by the Inspector at examination.

Employment Land

2.5 Policy DS4 of the adopted Nuneaton & Bedworth Local Plan also sets out a need for at least 107.8 ha of employment land over the plan period within the overall development need. This figure is based on the Council’s Employment Land Study published alongside the Local Plan, which identifies an overall requirement for 87 ha of employment land. However, similarly, to the agreement reached between the Coventry and Warwickshire HMA Boroughs to co-operate in assisting Coventry City Council meet its unmet housing need.

2.6 The Coventry, Warwickshire and Hinckley & Bosworth Joint Committee considered and agreed an Employment Land Memorandum of Understanding, in which the Borough’s agreed to co-operate in assisting Coventry City Council meet its unmet need for 241 ha of employment land. Nuneaton & Bedworth agreed to plan for 26 ha of employment land in addition to the 87 ha of employment land to meet its own need. However, the Council was only able to accommodate 16.6 ha of additional employment land on top of its own need. This approach was again considered to be sound by the Inspector at Examination.

Sub-Regional HEDNA

Housing Needs

- 2.7 An updated Housing and Economic Development Need Assessment (HEDNA) for the Coventry and Warwickshire HMA was produced in October 2022. This identifies a standard method assessed housing need of 5,554 dpa for the HMA and a local housing need for Nuneaton and Bedworth of 435 dpa derived from 2014-based demographic projections.
- 2.8 However, the sub-regional HEDNA sets out that issues have been identified with the accuracy of ONS population projections for Coventry, which have been systematically over-estimated dating back to at least 2001 and have influenced the assessment of housing need using the standard method. This was identified as an issue in the previous 2015 Updated Assessment of Housing Need and has since been recognised by the Statistics Regulator and accepted by the ONS. Importantly the initial 2021 Census data released in June 2022 corroborates the over-estimation of the ONS projections for Coventry.
- 2.9 For Nuneaton and Bedworth, the 2021 Census population of 134,200 persons was higher than projected in the 2014-based Sub-National Population Projections (129,500) which feed into the Standard Method.
- 2.10 The Sub-Regional HEDNA therefore modelled alternative demographic projections which take account of the initial 2021 Census data releases and applies these through the framework provided by the standard method. The results of the alternative trend-based projections identify a lower level of housing need at 4,906 dpa across the HMA and 409 dpa in NBBC due to lower population growth in Coventry than generated using over-estimated ONS projections.

Table 2.1 Coventry and Warwickshire Overall housing need per annum – as identified in Sub-Regional HEDNA

	Coventry	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	HMA
2014-based	3,188	176	435	516	564	675	5,554
Trend-based	1,964	119	409	735	868	811	4,906

Source: Coventry & Warwickshire Housing Market Area Housing and Economic Development Need Assessment, November 2022.

- 2.11 Econometric forecasts presented in the 2022 HEDNA did not point to as strong growth in the HMA moving forwards as seen in recent years and it was found that there was no case for adjusting upwards overall housing need. However, for Nuneaton and Bedworth, the analysis found that

between 372 – 434 dpa would be required to support the economic forecasts considered. The higher end of this range was based on continuation of historical commuting patterns.

- 2.12 The 2022 HEDNA does however conclude that the affordable housing evidence supports the case for considering, as part of the plan-making process, higher housing provision in order to boost the delivery of affordable housing. This is considered further in Section 6.
- 2.13 The trend-based projection for employment growth used in the sub-regional HEDNA envisaged growth of 5,000 jobs in the Borough in net terms between 2021-39. The table below breaks down the forecast by broad sector and illustrates that it envisaged a drop in manufacturing employment (-600), with growth in particular in public services; leisure; and social care.
- 2.14 Using the employment land model, growth in office-based employment of 660 FTE jobs was expected, with modest growth in warehousing employment (270 FTEs) to 2039. In contrast a net decline in industrial jobs in the manufacturing sector was forecast (-460 jobs).⁵

Table 2.2 Change in Total Employment in N&B 2021-39 - Cambridge Econometrics Forecasts

	Change in Total Employment ('000s), 2021-39
Primary Activities	0.0
Manufacturing	-0.6
Utilities	0.0
Construction	0.0
Wholesale & Retail	0.2
Transport & Storage	0.4
Leisure	0.9
Professional Services	0.5
Public Admin, Education and Health	2.1
Residential & Social	0.7
Other Services	0.0
Total Employment	5.0

Source: Cambridge Econometrics

Employment Land Needs

- 2.15 The sub-regional HEDNA also considers employment land requirements across Coventry and Warwickshire looking to 2041 and 2050. Modelling employment land needs by drawing together a range of forecasting techniques and local intelligence, as well as factoring in a margin to incorporate

⁵ See NBBC draft HEDNA Table 9.1

flexibility, the sub-regional HEDNA identifies the employment land need set out in Tables 3.2 and 3.3 below.

- 2.16 The office floorspace need is derived from the economic forecasts with a 2 year margin added on. For Nuneaton and Bedworth this equates to a need for 2.2 ha of space to 2041. For general industrial (which includes B2 manufacturing and smaller B8 units) a need for 45.5 ha to 2039 is identified which is based on an analysis of completions data over the 2011-19 period (see Table 9.13 therein) with development for strategic B8 excluded; with the inclusion of a margin based on 5 years based on gross completions data.

Table 2.3 Employment Land Needs 2021-2041, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	5.3	56.1	61.4	
N. and Bedworth	2.2	45.5	47.7	
Rugby	5.2	150.5	155.7	
Stratford-on-Avon	5.2	166.1	171.3	
Warwick	11.4	56.2	67.6	
Coventry	8.5	147.6	156.1	
Total	37.8	755.0	792.8	606

Source: Coventry & Warwickshire Housing Market Area Housing and Economic Development Need Assessment, November 2022.

Table 2.4 Employment Land Needs 2021-2050, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	7.0	81.4	88.4	
N. and Bedworth	3.0	66.0	69.0	
Rugby	6.5	218.2	224.7	
Stratford-on-Avon	7.2	240.9	248.1	
Warwick	15.8	81.4	97.2	
Coventry	10.0	214.0	224.0	
Total	60.3	373.3	433.6	709

Source: Coventry & Warwickshire Housing Market Area Housing and Economic Development Need Assessment, October 2022.

- 2.17 Within the need for employment land, the sub-regional HEDNA in addition identifies a need for 606 ha of land to 2041 and 709 ha to 2050 to accommodate the need for growth of the strategic warehousing (Class B8) sector across Coventry and Warwickshire. Several key locations / corridors which could potentially accommodate this level of strategic B8 development are identified based on factors such as road accessibility, power supply, proximity to rail terminals, labour availability, and neighbouring activities. The sub-regional HEDNA concludes that planning for strategic B8 development is inevitably an area where it will be important that the local authorities in the sub-region continue to collaborate.

Nuneaton & Bedworth Draft HEDNA

Housing Need

- 2.18 A draft HEDNA for Nuneaton & Bedworth⁶ was also published in May 2022, which was produced to inform preparation of the Borough's Local Plan Review Preferred Options Consultation. The figures for housing and employment needs identified in the 2022 Coventry and Warwickshire HMA HEDNA are notably below that set out in the draft Nuneaton & Bedworth HEDNA.
- 2.19 The draft HEDNA was intended to represent an interim position to support progress with the local plan in advance of the release of 2021 Census data. However, it was also able to give consideration to more local dynamics specific to Nuneaton and Bedworth Borough.
- 2.20 The Nuneaton & Bedworth draft HEDNA identifies stronger population growth in Nuneaton & Bedworth in recent years relative to the 2014-based ONS projections. Applying this evidence to produce alternative trend-based projections, the draft HEDNA drew tentative conclusions on Nuneaton & Bedworth's overall housing need – identifying a need for 9,690 new homes (646 dpa) over the plan period of 2024 – 2039, significantly more than that generated through application of the standard method.

Table 2.5 Overall housing need identified in N&B draft HEDNA 2021 - 2039

	Dwellings per annum (dpa)	Requirement over 2021-39 Plan Period
Standard Method Minimum Local Housing Need (using 2014-based Household Projections)	437	7,866
HEDNA Updated Assessment (based on review of demographic trends)	646	9,690

Source: Nuneaton & Bedworth Housing and Economic Development Need Assessment, May 2022.

⁶ [Nuneaton & Bedworth Housing and Economic Development Need Assessment, May 2015.](#)

- 2.21 The notable difference between the figure of housing need in the draft Nuneaton & Bedworth HEDNA and the Coventry and Warwickshire HMA HEDNA partly arises from the use of 2021 Census data to develop alternative projections in the sub-regional assessment which was not available at the time the draft Nuneaton & Bedworth HEDNA was produced. However, the difference is predominantly due to the use of 10-year migration trends in deriving the demographic projections in the sub-regional HEDNA as against the (pre-Census) modelling in the Borough-specific assessment which sought to model demographic projections using migration trends over a more recent 5 year period (2015-20).
- 2.22 The release of the 2021 Census data has necessitated reconsideration of the demographic evidence. This is appropriate given the recognised issues with the data for Coventry in particular but also the difference between the Census results and previous ONS estimates for other Boroughs including NBBC. For NBBC the Census population in 2021 was 3,600 persons higher than previous ONS figures, a not insubstantial level and 2.8% variance in the population size.
- 2.23 ONS is able to relatively accurately calculate births and deaths, which are generally well recorded, and therefore the variance is likely to be principally attributed to stronger net-migration to the Borough. The issue however is that it is not possible to precisely ascribe in what years between 2011 and 2021 migration was inaccurately accorded. The Sub-Regional HEDNA therefore sought to model demographic trends based on 10-year trends over the inter-Censal period. This approach, which was agreed by the HMA authorities, is an accurate means of projecting demographics based on the data available and takes account of the cover periods of stronger and weaker housing market conditions across an economic cycle. The table below summarises the assessment of housing need in the Borough in different studies.

Table 2.6 Summary of Nuneaton & Bedworth housing need evidence

Evidence	Nuneaton & Bedworth OAN	Local Plan period
HMA 2015 SHMA 2012-based projections + Coventry City Council need	502 dpa (10,040) + 201 dpa (4,020)	2011 – 2031
HMA 2022 HEDNA - 2014-based projections	435 dpa (6,525)	2021 – 2039
HMA 2022 HEDNA alternative projections	409 dpa (6,135)	2021 – 2039
NBBC 2022 HEDNA 2014-based projections	437 dpa (6,555)	2021 – 2039
NBBC 2022 HEDNA alternate projections	646 dpa (9,690)	2021 – 2039

2.24 The draft NBBC's approach of making adjustments to the 2018-based ONS Sub-National Household Projections is based on pre-Census data which has now effectively been superseded. However, it is relevant to consider what impact the use of a short-term migration trends might have. Icenl has therefore undertaken a sensitivity analysis which replicates the earlier analysis by seeking to estimate migration over the 2015-20 period. This results in a higher starting point net migration to the Borough (845 pa instead of 548 pa). This results in higher household growth of 445 per annum. With the 23% affordability uplift applied (based on the 2021 affordability ratios) a housing need for 549 dpa is generated.

Table 2.7 Sensitivity Analysis – 5 Year Migration Trends

	Households 2022	Households 2032	Change in households	Household Growth pa	Local housing need (dpa)
5 year migration (2015-20)	57,416	61,866	4,450	445	549
10 year migration (2011-21)	57,302	60,618	3,316	332	409

Employment Land Needs

2.25 The draft Nuneaton and Bedworth HEDNA also considers employment land requirements over the plan period of the emerging Local Plan Review (2021 – 2039). The draft HEDNA concludes that there is a need for 82.5 ha of employment land of the plan period, including 2 ha to accommodate 10,000 sq. m of office floorspace and 80.5 ha to accommodate 329,200 sq. m of industrial and warehouse floorspace. The conclusions are shown in the two tables below.

Table 2.8 Office Floorspace Need 2021-39, Nuneaton and Bedworth

	Nuneaton & Bedworth
Office Floorspace Need, 2021-39	9300
2 Yr Margin	900
Total Floorspace	10200
Land (ha)	2.0

Table 2.9 Industrial and Warehouse Floorspace Need, 2021-39, Nuneaton and Bedworth

	Industrial	Warehousing/ Distribution	I&W Total
5 Year Completions	22,900	220,100	243,000
Margin	12,400	73,900	86,200
Total Floorspace (sq.m)	35,300	293,900	329,200
Ha	7.1	73.5	80.5

2.26 The report adopted a consistent broad approach to calculating employment land needs as the sub-regional HEDNA, using the labour demand modelling to identify office development needs and completions trends for industrial and warehouse development. It aligns to the plan period to 2039. However, there are two key differences for industrial and warehousing:

a). It took account of more recent completions looking at data to 2020/21, whereas the sub-regional HEDNA considered data only to 2019 as this was the only timeframe for which consistent data was available for all of the HMA authorities. Its preferred approach in drawing conclusions for Nuneaton and Bedworth was to project forward a 5 year completions trend (2016-21) whereas the sub-regional evidence considered a 7 year period (2011-19);

b). The draft NBBC HEDNA considered all industrial and warehousing development, whereas the completions trend in the sub-regional HEDNA sought to remove completions related to strategic B8 development which was treated separately. The effect of this was to reduce the completions projection by 19%.

2.27 As set out in the sub-regional HEDNA, the draft Nuneaton & Bedworth HEDNA also concludes that the Borough Council will need to work with others in the sub-region to confirm what proportion of the identified need for strategic warehousing it might accommodate, working with other authorities in the sub-region through the Duty to Cooperate to do so.

NUNEATON & BEDWORTH HISTORIC HOUSING DELIVERY

2.28 Data set out in the Authorities Monitoring Reports⁷ records historical housing delivery. It demonstrates that housing delivery has varied over time but shows a clear and sustained upward trend over recent years.

2.29 Prior to the 2014/15 monitoring period, housing delivery was typically low at circa 100 to 300 dpa. Since 2014/15 housing delivery has increased significantly: first between 2014/15 and 2017/18 to around 400 dpa; then to circa 600 dpa between 2018/19 to 2020/21; and finally, to 809 additional dwellings delivered in the 2021/22 monitoring period.

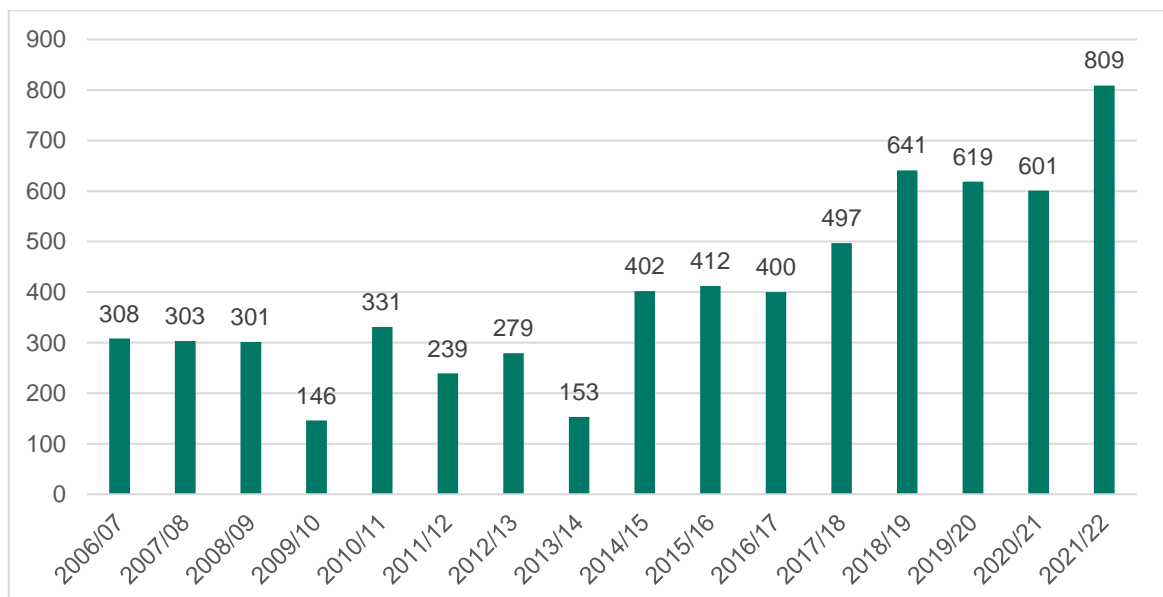
⁷ [Nuneaton & Bedworth BC Annual Authorities Monitoring Reports \(AMRs\)](#).

Table 2.10 Nuneaton & Bedworth Net Completions 2006/07 – 2021/22

Year	Net completions
2006 / 07	308
2007 / 08	303
2008 / 09	301
2009 / 10	146
2010 / 11	331
2011 / 12	239
2012 / 13	279
2013 / 14	153
2014 / 15	402
2015 / 16	412
2016 / 17	400
2017 / 18	497
2018 / 19	641
2019 / 20	619
2020 / 21	601
2021 / 22	809
Total	6,441
5 - year average (2017/18 - 2021/22)	633
10 - year average (2012/13 - 2021/22)	481

Source: Nuneaton & Bedworth Borough Council Annual Authorities Monitoring Reports.

Figure 2.1 Nuneaton & Bedworth Net Completions 2006/07 – 2021/22



Source: Nuneaton & Bedworth Borough Council Annual Authorities Monitoring Reports.

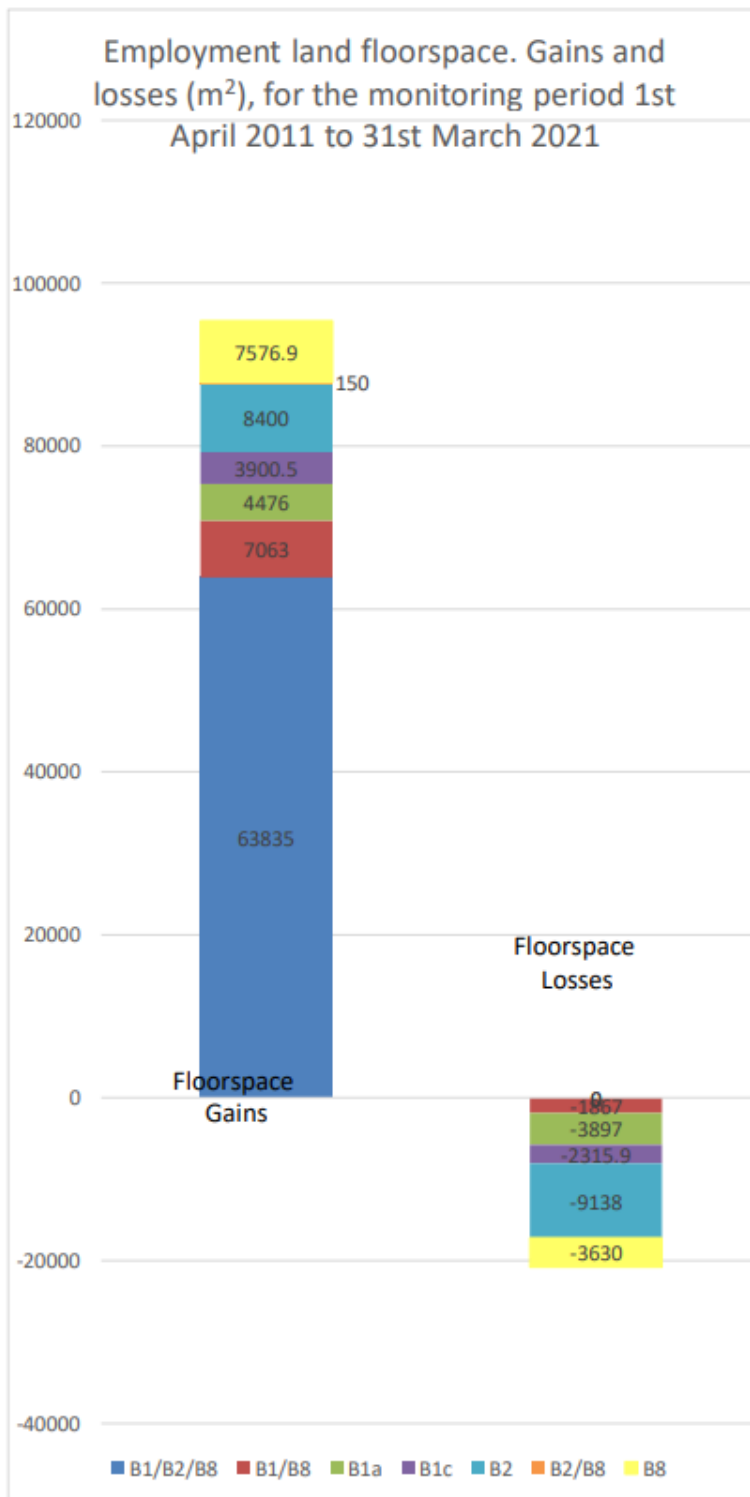
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- 2.30 The increase in housing delivery since 2014 reflects development starting to come forwards on greenfield sites particularly focused on the northern and eastern sides of Nuneaton. This includes sites such as Church Lane and Weddington Road in the Weddington Ward; to the north of the A47 The Long Shoot, and Land at Lower Farm again in Weddington Ward. These were sites which were beyond the Green Belt.
- 2.31 The Council adopted its current Borough Plan in June 2019. This replaced the previous Local Plan which was adopted in 2006. The allocation of residential sites through that Plan can be expected to support continued housing delivery in line with recent trends in the short/medium-term.
- 2.32 As part of the process of undertaking the Borough Plan Review, the Council consulted on preferred options in Summer 2022. This illustrated the theoretical potential to accommodate the need identified in the draft NBBC HEDNA (646 dpa) in the Borough over the plan period without the need to release land from the Green Belt.

Nuneaton & Bedworth Employment Floorspace Delivery

- 2.33 Data set out in the Authorities Monitoring Reports⁸ also monitors the delivery of employment floorspace in the Borough falling within use class B1 (now within Use Class E), B2 and B8 on sites greater than 0.2 ha. The data demonstrates that there has been a net gain of 74,533 sq. m (22.7 ha) of employment floorspace between 2011 and 2021, a significant increase. A further 0.6 ha was reported as under construction in the Council's latest published AMR (2020/21 monitoring period), along with a further 33.9 ha as having full or outline planning permission.
- 2.34 A number of the larger allocations in the 2019 Borough Plan have yet to come forward, but do provide the potential to contribute to future supply.

⁸ [Nuneaton & Bedworth BC Annual Authorities Monitoring Reports \(AMRs\).](#)

Figure 2.2 Employment floor space gains and losses in m² for the monitoring period 1st April 2011 to 31st March 2021



Source: Nuneaton & Bedworth Borough Council 2020/21 AMR.

3. NUNEATON & BEDWORTH LOCAL PLAN REVIEW VISION

Nuneaton & Bedworth Council Plan

- 3.1 The Nuneaton & Bedworth Council Corporate Plan titled 'Building a Better Borough'⁹ sets out a vision focused around three key themes 'live', 'work', 'visit'. The 'live' theme seeks to promote residents' health and wellbeing; enable appropriate housing development; sponsor a sustainable green approach; and prioritise community safety and empowerment. The 'work' theme seeks to grow a strong and inclusive economy; champion education and skills; embrace new and emerging technology; and support local businesses. Finally, the 'visit' theme seeks to create vibrant and diverse town centres; stimulate regeneration; celebrate and promote our heritage; and improve the physical environment.

Nuneaton & Bedworth Local Plan Review

- 3.2 The policies within the emerging Local Plan Review support the Council's vision of the Borough being the place of choice to live, work and visit. The preferred options document¹⁰ sets out the following vision: "By 2039, Nuneaton and Bedworth Borough will be a place of sustainable economic growth with diverse job prospects with healthy and safe communities offering housing for all and supported by an integrated infrastructure network. The environment of the Borough will be improved through greater sustainable transport options, more/improved open spaces and leisure facilities, increased tree planting and reduced pollution levels, whilst conserving and enhancing the historic environment".
- 3.3 Promoting sustainable and resilient economic growth across the Borough, including the regeneration of its town centres is clearly a key objective of the Council's Corporate Plan and the emerging Local Plan Review. It is important that the Council's strategies put in place to deliver this objective align with the level of housing delivery over the plan period. Delivery of new housing can support the sustainability of economic growth, supporting investment and development viability.
- 3.4 Alongside the Council's sustainable economic growth objective is a clear aim to enable the delivery of housing development that meets the needs of everyone living in the Borough. For example, Objective 4 of the Council's Local Plan Review Preferred Options consultation document is "*to provide a steady and adequate level of suitable housing for all*". The delivery of an appropriate

⁹ [Nuneaton & Bedworth Borough Council Corporate Plan](#).

¹⁰ [Nuneaton & Bedworth Borough Local Plan Review Preferred Options Consultation](#).

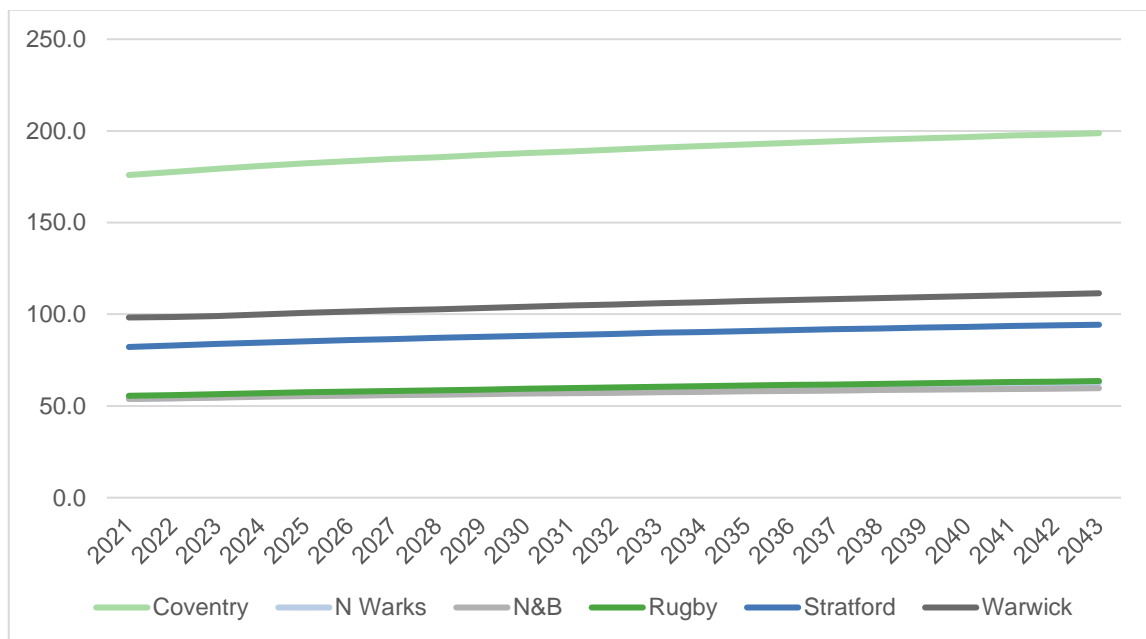
number and mix of affordable homes is a key component of delivering this objective over the plan period.

4. SUPPORTING THE ECONOMY AND TOWN CENTRES

Local Economic Context and Forecasts

- 4.1 The 2022 Coventry & Warwickshire HEDNA used trend-based econometric forecasts to consider future economic growth. It considered forecasts prepared by Cambridge Econometrics which showed that Nuneaton and Bedworth could be expected to see the lowest level of economic growth of the HMA authorities with net jobs growth of at 5.8% between 2021 and 2043 compared to 8% to 23% in the other HMA authorities.
- 4.2 This is in a context in which the Borough already has the lowest volume of jobs of the local authorities within Coventry & Warwickshire and has a relatively low jobs density with 64 jobs per 100 people of working age compared to an average of 80 across the West Midlands and 84 per 100 nationally.¹¹

Figure 5.1 Nuneaton & Bedworth Economic Growth Projections between 2021 - 2043



Source: Coventry and Warwickshire Housing Market Area Housing and Economic Development Assessment, October 2022.

- 4.3 The economic forecasts in the 2022 HMA sub-regional HEDNA are trend based. They take past performance, the structure of the local economy (such as the representation of different sectors) and its relative historical performance compared to the region or country; and these are the key

¹¹ ONS Jobs Density data for 2020, sourced from NOMIS

considerations which inform the projections of future economic growth as described in Section 6 in the Sub-Regional HEDNA. They are projections of the future based on the past – but they don't consider the impact of emerging strategies and forthcoming development schemes (in so far as these may result in a divergence from the historical trend).

4.4 Weaker growth in the Borough relative to the other HMA authorities is also manifest in issues associated with the quality of jobs, and the skills profile of the Borough's population. The Borough's GVA per head of around £17,000, is the lowest in the County, which is around £34,000. This is a measure of the relative productivity of the local economy and quality of jobs. As such, a key focus for Nuneaton and Bedworth Borough Council is improving the socio-economic prospects of the Borough's residents through its economic strategies and initiatives.

4.5 In addition, the Borough's Town Centres have suffered significantly over the past five years. The shift towards out-of-town shopping and online shopping, along with other pressures such as market uncertainties, economic recession and the impact of the Covid-19 pandemic in particular, have led to increasing vacancy rates and growing concerns about the vitality and viability of the Borough's Town Centres. A key objective of the Council's Economic Strategy is to support the regeneration of the Borough's Town Centres.

Investment Plans

4.6 In this section we review current and emerging investment plans and development projects which can be expected to support economic growth in the Borough.

Nuneaton and Bedworth Draft Local Economic Strategy

4.7 The Council's Draft Local Economic Strategy sets out a vision aligned with the Council's Corporate Plan that seeks to promote enterprise and prosperity to deliver a step change for Nuneaton and Bedworth by 2032, allowing residents and businesses to regain pride in their Borough as a place to live, work and visit.

4.8 Four priorities are identified to deliver this Vision: developing a more competitive economy, promoting prosperity, promoting a strong sense of place and promoting a sustainable economy.



- Promote residents' health & wellbeing
- Enable appropriate housing development
- Sponsor a sustainable green approach
- Prioritise Community Safety & Empowerment



- Grow a strong & inclusive economy
- Champion education & skills
- Embrace new & emerging technology
- Support local businesses



- Create vibrant and diverse Town Centres
- Stimulate regeneration
- Celebrate and promote our heritage
- Improve the physical environment

4.9 The draft Strategy identifies a number of key sectors with economic growth potential in the Borough, including: manufacturing; wholesale and retail; transport and storage; tourism; and health and social care. Over the period to 2030 it identifies the potential for manufacturing growth, particularly in the automotive sector and in the context of the nearby MIRA Technology Park. It identifies the need for mixed-use town centre regeneration to respond to changing shopping patterns. The Borough's location within the logistics 'Golden Triangle' is recognised with the potential for growth identified (400+ new jobs to 2030). Further growth potential is identified in the Tourism sector and health and social care (400+ jobs in each to 2030). Town centre regeneration, the development of the entertainment, leisure and night-time economies and place-making investment are all connected and will support the Borough's Town Centres.

Nuneaton Town Centre

4.10 Nuneaton is the largest town in Warwickshire, with a population of 86,552. The town's retail centre has declined in recent years due to online trading and the loss of key anchor stores. The Covid-19 pandemic has exacerbated these issues¹².

4.11 A multi-agency plan to transform Nuneaton Town Centre by 2030 – The **Transforming Nuneaton Programme** (TNP) – has been created to address these challenges. Partners include Warwickshire County Council (WCC), Coventry and Warwickshire LEP (CWLEP) and the West Midlands Combined Authority (WMCA). The TNP envisages total investment of £1.0 billion in the programme.

4.12 The Council's Nuneaton Town Investment Plan¹³, March 2021, sets out a plan to fund a series of projects that will deliver on the vision of regenerating Nuneaton Town Centre. The projects that are

¹² [Nuneaton & Bedworth Borough Council, Nuneaton Town Investment Plan, March 2021.](#)

¹³ https://www.nuneatonandbedworth.gov.uk/downloads/file/4210/nuneaton_town_investment_plan

expected to be brought forward and their expected economic impact are summarised in table 5.1 below.

Table 4.1 Summary of Nuneaton & Bedworth Town Investment Plan Projects

Project	Economic Impact
Digital infrastructure – installation of 750m of dark fibre cable to act as an enabler for private sector investment.	£45 million GVA uplift over 10 years
George Elliot Visit Centre - redevelopment of Griff House to provide a new exhibition space.	4 new jobs over 10 years 20 volunteers 300,000 visitors
Digital Skills and Innovation Centre – new educational facility providing training in skills and hospitality for all ages groups.	15 direct jobs over 10 years 290 business starts 202 jobs lasting at least one year 2,600 new learners Reduced unemployment and £13.4 million GVA uplift from skills enhancement
Parks revival – deliver improvements to the park located in Nuneaton town centre.	Health and wellbeing benefits Improved perception of the town centre and associated positive economic impacts
The Saints – refurbishment of the Saints building and extending the existing enterprise zone to deliver shared workspace for 4 businesses, as well as community and educational floorspace.	2 direct jobs over 10 years 140 business starts 100 volunteers 20 apprentices Reduced unemployment Increased employability for 2,000 residents
Weddington Road Cycle Link	Increased health and wellbeing for residents Improved attractiveness of town centre and associated positive economic impacts
Cycle and pedestrian access improvements	Improved perception of town centre and associated positive economic impacts
Wheat Street Junction improvements	Improved road access Reduced traffic congestion Support investment in town centre and diversification of uses.
Nuneaton Museum and Art Gallery	Extension and improvement to the art gallery 28,500 additional visitors 2 new apprentices per year
Corporation Street and Queens Road Junction improvements	Improved road access Reduced traffic congestion

	Support investment in town centre and diversification of uses
E-mobility hub	Increased access to EV charging infrastructure Associated decrease in CO2 emissions

Source: Nuneaton Town Investment Plan, March 2021.

- 4.13 The draft **Nuneaton Town Centre Strategy** sets out a vision “to transform the town centre into a distinctive and vibrant hub of activity offering high quality opportunities where people can live, work and visit”. The strategy identifies a number of sites under development and several sites that are not currently under development but are considered good development opportunities. These are summarised in Table 5.2 below.

Table 4.2 Summary of Nuneaton & Bedworth Town Centre Development Sites

Site	Development
Sites under development	
Vicarage Street	Library & Business Centre (Construction starts mid 2023. Opening early 2025). Residential (68 houses) expected to be in place 2024 – 2026.
Abbey Street	Mixed Use; Retail, Leisure and Residential including 145 Room Hotel, Food Hall, Health Care centre and Public Square, Residential Accommodation (28 houses) and new college building. 300 space multi-story car park plus parking for hotel use. Hotel construction started in 2022 opening 2023. Construction of the remainder of the site will start in 2023.
Bridge to Living	Mixed use scheme comprising live/work units, retail/workspace, apartments and town houses. Development of river frontage and improved connections between Town Centre and Riversley Park opening up and “greening” the urban landscape (to be constructed by March 2024).
22 Queens Road	Refurbishment of the upper floors of the old art deco co-op building for office / commercial use. Creating separate entrances and more viable high quality, commercial space. (Complete and available for lease).
Queens Chambers	Refurbishment of the two upper floors of this retail unit for office use. Creating separate entrances and more viable high quality, commercial space. (Complete and available for lease).
Debenhams proposals	Private sector development that will see the part demolition of the Debenhams store to see private sector rental apartments developed. (Awaiting planning permission).
Further development opportunities	
Dugdale Street	A mixture of commercial and residential with significant car parking. The Opportunity: Reshaping the heart of the town centre, providing a positive frontage onto the ringroad which the site

	currently lacks. Opportunity for Medical facility, Education, residential retail.
Newtown Road	1.5 hectare site immediately adjacent to the Abbeygate Shopping Centre. It currently accommodates an out-of-town style retail unit occupied by Halfords and Dreams to the west and some smaller retail. Opportunity for education, residential and car parking.
Harefield Road	Approximately 1.1 ha, the site is located north-east of the retail core and immediately adjacent to the Abbeygate Shopping Centre. Approximately half of the site is the Nuneaton Bus Station. The remainder comprises a mix of predominantly commercial uses including retail and offices. Opportunity for Arts / Theatre space, residential, car parking and retail
Abbeygate and Heron House	Approximately 0.7 ha, the site is located at the centre of the retail core. The site comprises Abbeygate Shopping Centre and Heron House. Both buildings have a dated appearance and are of little architectural quality so this provides an opportunity to reshape the heart of the town centre, Development could be delivered to four storeys with retail use delivered at ground-floor level. The intention would be to deliver residential or office space on the upper floors with mews housing provided on the interior of the site.
Bondgate Approach	A 0.8 ha site comprising a community centre and various commercial uses including offices, retail and food & beverage. The site presents the opportunity to provide a green corridor alongside the River Anker, providing an improved pedestrian route to the railway station. Development could comprise a single mixed-use building of three floors with retail on the ground floor and residential units above. The rest of the site could be landscaped to provide a high quality green space along the River Anker.
Railway Station area	Approximately 3.3 ha. The site presents the opportunity to provide a new combined transport interchange, accommodating rail, bus, and taxis. Commercial space could be integrated into the area alongside a community facilities along with multi storey car parks.
Mill Walk	Approximately 0.7 ha. The site currently comprises car parking for the Town Hall. To the south of the site is a 1980s block of Council offices and an electrical substation. The site presents an opportunity to improve perceptions of Nuneaton being the key gateway into the town centre from Coventry making use of the waterside and parkside location. Development could comprise a 3-storey office block and 3-storeys of residential flats which would have river frontage. The site also presents the opportunity to provide an extension of the George Eliot memorial gardens.

Source: Nuneaton Town Centre Strategy.

Bedworth Town Centre

- 4.14 Bedworth has a population of circa 38,000 and has similarly experienced decline in recent years. The Council is seeking to invest in the Bedworth Town Centre and submitted a bid to the UK Government for circa £14 million to deliver a physical activity environment in Bedworth comprising a

new physical activity hub in the Destination Park and new Green Corridor linking the park into the Town Centre. This Green Corridor will help facilitate regeneration of Bedworth Town Centre, safe and accessible active travel, and informal recreation.

The Role of Housing in Supporting Town Centre Regeneration

The volume of expenditure within a town centre catchment area, as well as leakage of spend to other centres, are key influences on the scale and quality of retail and leisure provision within town centres. Housing delivery contributes positively to population and expenditure growth and therefore to the potential for sustainable regeneration of the Borough's town centres. Put simply in the context of a growth in online retail spending, the Borough needs to grow its population base through the delivery of housing – as well as reducing leakage of expenditure to other centres outside of the Borough – if it wants to put its town centres on a sustainable footing.

Employment Land Need

- 4.15 As set out in Section 2, the sub-regional HEDNA identifies a need for 47.7 ha of employment land to 2041 in Nuneaton & Bedworth. The sub-regional HEDNA also identifies a need for 606 ha of strategic warehousing across the sub-region to 2041. Alongside this, the draft Nuneaton and Bedworth HEDNA identifies a need for 82.5 ha (2021-39) covering the specific Local Plan Review period to 2039.
- 4.16 The reasons for the differences between the two documents are explained in Section 2. Consideration however has to be given to which should be preferred in a Borough-specific context. Icenis consider that the Borough-specific report should be preferred as an initial basis for taking forward the Borough Plan as:
- It was able to consider more up-to-date data on employment land completions in drawing conclusions on the industrial and warehouse demand. This seems appropriate in a Borough-context given the evidence of supply constraints in the earlier part of the period considered as reflected in the Borough's previous employment land evidence and identified in the draft NBBC HEDNA at Para 9.40 which included constraints on land availability and power capacity available;
 - In addition to the local needs identified in the sub-regional HEDNA (c. 48 ha to 2041) the Borough will need to contribute to strategic B8 warehousing and distribution needs. The 80.5 ha calculation in the NBBC specific report included provision for strategic B8 in line with past development trends in the Borough, albeit that it did not segment this out from the analysis.
- 4.17 The 80.5 ha need could appropriately be treated as an assessment of the Borough's employment land need, which includes making a contribution to sub-regional strategic B8 warehousing and

distribution needs. We turn next to consider the supply situation. It may be appropriate to plan above this level to provide supply-side flexibility and/or if there potential to provide a higher contribution to the strategic B8 warehousing/distribution needs.

Key Development Sites

4.18 We will now consider how employment land provision might contribute to economic growth and the implications of this for housing need. There are a number of the key employment allocations within the current Borough Plan, which was adopted in 2019. These have yet to be built out. It is reasonable to expect these sites to contribute to future employment growth in the Borough:

- Faultlands (EMP1) – development in line with the two Reserved Matters consents for the site which envisage delivery of two units – one of 19,950 sq.m and one of 72,700 sq.m.
- Phoenix Way/ Wilsons Lane (EMP2) – development of an industrial development in line with the outline consent (55,750 sq.m floorspace) approved subject to the signing of the S106 Agreement.
- Coventry Road (EMP4) – delivery of an employment development including both office, industrial and warehouse space.
- Bowling Green Lane (EMP7) – development of this c. 26 ha site adjoining the junction of the M6 and A444. Given its location, we have assumed strategic B8 development.

4.19 We have treated the Prologis Extension at Keresley as more contributing to meeting the shortfall in employment land provision in Coventry, rather than meeting a Borough-specific need.

Potential Additional Development Sites

4.20 We understand that in addition to the above site allocations within the 2019 Local Plan, the Council is considering the allocation of a further employment site at Judkins Quarry to support the levelling up agenda and enable economic growth recognising economic deprivation within the Borough.

4.21 Judkins Quarry is located to the north-west of Nuneaton and falls within the Borough. The site is bounded by the B4114 (Tuttle Hill) and B4111 (Mancetter Road) to the South and West; the canal to the East; and Yaxley Lane to the North. The site is well connected by road services and is in close proximity to Nuneaton Town Centre.

4.22 Mixed-use development is envisaged. The Judkins Quarry development is expected to deliver circa £40m GVA over ten years, bringing forward 450 - 550 new homes, 1,000 - 1,500 jobs and 37 - 46,000 sq. m of commercial space for manufacturing and warehousing/logistics (Use Classes B2 and B8). IcenI has taken the midpoint of the floorspace range and assumed development of a mix of manufacturing and warehouse space on the site.

4.23 In quantitative terms, this site could support a further contribution to meeting the sub-regional strategic B8 need and provide land to support manufacturing inward investment. Its allocation would therefore be justified in quantitative and qualitative terms having regard to the evidence base.

4.24 IcenI would also note that there is a further sub-regionally significant employment allocation which is located immediately adjoining the Borough boundary in the north of the Borough close to the A5 at MIRA South. This is an allocated site in North Warwickshire Borough Council but sits close to Nuneaton and Bedworth.

Supporting Sustainable Economic Growth and Regeneration

4.25 The NPPF (paragraph 19) requires the planning system to do everything it can to support sustainable economic growth and national policies for plan-making emphasise the alignment of strategies for housing and employment within local plans. It is important that the Borough Plan Review thus takes into account the economic growth potential associated with key planned investment and regeneration projects in the Borough.

4.26 The key development sites identified above and town centre regeneration plans have the potential to drive growth in jobs and the local economy. However, significant enabling infrastructure investment, particularly to enhance local transport infrastructure, is required to unlock the investment zone sites and deliver sustainable development and economic growth. The delivery of housing can help to support development viability and support investment in local infrastructure projects on the one hand; whilst job creation on the other will support demand for homes in the Borough. It is therefore appropriate to consider how these initiatives may influence the scale of housing need.

4.27 The level of investment in the local economy and town centre regeneration, as well as the delivery of major employment sites, suggest that Nuneaton and Bedworth's economy could potentially perform more strongly than shown in trend-based econometric forecasts in the Sub-Regional HEDNA.

4.28 IcenI has sought to model on this basis a Planned Economic Growth Scenario for future economic performance in the Borough. The methodology used is as follows:

- The starting point has been the Cambridge Econometrics trend-based forecasts for total employment by sector over the period to 2039;
- We have then considered and modelled the gross jobs growth which could arise from the delivery of the major employment sites in the Borough and Town Centre regeneration;

- Adjustments have then been made to the gross jobs anticipated to arise from the key development projects to take account of multiplier effects, but also the potential displacement effects. FTE jobs and then converted to total jobs using sector-specific ratios drawn from BRES.
- Finally, we have overlaid the jobs growth associated with projects on the Cambridge trend-based forecasts and carefully considered the interaction between the two, recognising that some development is necessary to deliver the growth forecast. Where appropriate we then make sectoral adjustments to derive an overall forecast for job creation in the Planned Economic Growth Scenario.

4.29 The results of this process are an adjusted scenario for employment growth. The Planned Economic Growth Scenario sees an increase of 8,500 total jobs over the 2021-39 period, equivalent to growth in the Borough's economy by 0.8% pa. This compares to growth of 5,000 jobs in the CE trend-based Scenario.

Table 4.3 Employment Growth in Nuneaton and Bedworth

	Employment Growth, 2021-39
CE Trend-based Scenario	5,000
Planned Economic Growth Scenario	8,500

Implications of Planned Economic Growth for Housing Need

- 4.30 To translate the Planned Economic Growth Scenario to housing need, we use the demographic projections developed as part of the Sub-Regional HEDNA as a starting point and then make adjustments to support growth in the Borough's workforce to align to this.
- 4.31 The modelling assumes that 2.7% of residents hold down more than one job based on ONS data for the Borough¹⁴. It builds in changes to economic participation, with a growing number of older people and women in work, in line with the Office for Budget Responsibility's 2018 Fiscal Sustainability Report. A 'part return to trend' approach has been used to modelling trends in household formation amongst younger persons again consistent with that in the sub-regional HEDNA.
- 4.32 As with the sub-regional HEDNA, two commuting scenarios are shown. The first assumes commuting patterns in line with the sub-regional HEDNA, applying a commuting ratio of 1.328. This means that workforce growth is assumed to be around a third higher than growth in workplace-based jobs in the Borough to take account of out-commuting to other employment destinations in net terms. The

¹⁴ ONS Annual Population Survey

second scenario models a 1-1 commuting profile where jobs growth and growth in residents in work grow in line with one another.

- 4.33 There are a range of factors to consider in selecting a preferred commuting position. Firstly, the current scale of net out-commuting is influenced by the relative under-provision of jobs in the Borough and its historical weaker relative growth compared to other parts of Coventry & Warwickshire. With above-trend employment growth there is the potential to see this change over time.
- 4.34 On the other hand, the Borough is still located close to other areas where substantial employment growth is expected, with the sub-regional HEDNA showing that Coventry is expected to see the strongest absolute jobs growth in the HMA. Similarly, there is expected to be employment growth at sites very close to the Borough boundaries. A key example of this would be the MIRA South site, which is allocated in North Warwickshire’s Local Plan and could see employment growth, indicatively, of around 2,500. If notionally a third of this was drawn from Nuneaton & Bedworth it would mean a growth in residents in employment of around 930 persons.

Table 4.4 Housing Need arising from Planned Economic Growth Scenario

	Households 2022	Households 2032	Change in house- holds	Per annum	Dwellings (per annum)
Census commuting	56,943	67,382	10,439	580	597
1:1 commuting	56,943	65,560	8,617	479	493

- 4.35 Taking these considerations into account, we consider that it is reasonable to take the midpoint of the two commuting scenarios as a reasonable estimate of the scale of housing need which would be necessary to support the Planned Economic Growth Scenario. This equates to a housing need for 545 dpa.
- 4.36 The evidence thus indicates that having regard to local economic initiatives and the delivery of employment land in the Borough, there is the potential for housing need of around 545 homes per year to arise.
- 4.37 The additional housing provision over and above the Borough’s local housing need figure of 409 dpa would provide ‘headroom’ to contribute to unmet needs arising from other areas in a context in which the additional jobs growth envisaged herein would still be accommodated within the overall housing need identified in the sub-regional HEDNA. This as a contribution to meeting unmet need from other areas would support workforce growth within the Borough and could therefore contribute to and support the Borough’s economic growth.

5. DELIVERY OF AFFORDABLE HOUSING

- 5.1 A further consideration in setting the housing target within the Local Plan is the delivery of affordable housing.
- 5.2 The sub-regional HEDNA has assessed the need for affordable housing in the Borough. The PPG sets out in Para 2a-024¹⁵ that the total affordable housing need needs to be considered in the context of its likely delivery as a proportion of overall housing provision on mixed-tenure developments taking into account (in essence) viability evidence, and outlines that “an increase in the total housing figures included in the plan may need to be considered where it could help to deliver the required number of affordable housing.”
- 5.3 The ‘*consideration*’ of an uplift to overall housing provision is therefore relevant in setting a housing target, but there is not a requirement to meet the affordable housing need in full. Specifically, the PPG in Para 67-001 is clear that that the needs of particular groups (in this case those needing affordable housing) may well exceed or be proportionally high in relation to the overall housing need calculated using the standard method as it will often be calculated having consideration to the whole population of the area as a baseline (as opposed to projected net growth in households which is the baseline in the standard method). Para 67-001 sets out that planning authorities will need to consider the extent to which needs (for affordable housing) can be met and in doing so can consider higher housing provision, but equally the anticipated deliverability of different forms of provision having regard to viability. In reality affordable housing provision is often constrained by the funding available to support it and viability considerations.

Affordable Housing Need

- 5.4 The sub-regional HEDNA models the need for affordable housing across the HMA authorities using the approach set out by Government in PPG. It identifies a net need for 3,833 social or affordable rented homes per annum across the sub-region, including 407 per annum in Nuneaton & Bedworth. No clear need for low-cost home ownership options, including First Homes, is identified in the evidence.
- 5.5 The scale of rented affordable housing need shown is marginally below the 445 homes pa need identified in the draft NBBC HEDNA. The latter did in addition identify a need for up to 208 affordable home ownership homes annually, but was clear that the inclusion of resales of market homes at

¹⁵ PPG ID: 2a-024-20190220

below lower quartile prices if included within the calculation would lead to a surplus of this type of affordable housing. This is the approach taken forwards in the sub-regional HEDNA.

5.6 Drilling further into the affordable housing position in the Borough, the evidence points to a significant need to support the delivery of affordable homes. In particular:

- At the time of writing there are 3,005 'active' households in housing need who are on the Council's Housing Register. The figure that has increased significantly in recent years pointing to a growing local need for affordable housing.
- Table 5.1 below shows a breakdown of applications by band. Band 1+ represents those in greatest need and includes homeless households occupying temporary homeless accommodation, as well as households with significant hardships of a medical or social welfare nature. There is a significant number of households in urgent need in Bands 1 and 2 highlighting the urgent need to increase affordable housing delivery.

Table 5.1 Number of applications for Council housing received by degree of need

	1 bed need	2 bed need	3 bed need	4 bed+ need	Total
Band 1+	93	131	64	21	309
Band 1	523	296	149	55	1023
Band 2	703	466	214	66	1449
Band 3	120	60	32	12	324
Total	1439	953	459	154	3005

Source: Nuneaton & Bedworth Borough Council Housing Register.

5.7 Table 5.2 below illustrates how rapidly the number of active households on the Council's Housing Register has increased in recent years and demonstrates the significant level of need for affordable housing in the Borough.

Table 5.2 Number of ACTIVE households on the Housing Register 2019 – Nov. 2022

	Total number of ACTIVE households on the Housing Register at 31st March each year
2019	1643
2020	1235
2021	1908
2022	2671
November 2022	3005

Source: Nuneaton & Bedworth Borough Council Housing Register.

5.8 Based on discussions with the Council's Housing Department, it is clear that:

- The last 3 years have seen a dramatic increase in levels of homelessness presentations to the Council, influenced in part by the declining availability of properties within the Private Rented Sector which are affordable to local households. Alongside this the turnover of properties in the social rented sector has fallen. This has equally influenced growth in the Housing Register.
- The Borough's private rental sector is experiencing unprecedented pressure, with lettings agents indicating that every property going on the to-let market receiving around 70 applicants. This is significantly impacting the ability the Council's client group to access private rented accommodation, which in turn has led to more people registering on the Council's Housing Register; households that are homeless and in temporary accommodation for longer periods of time; households that have been managing to avoid homelessness, becoming homeless because family or friends are no longer willing to accommodate them; and increasing demand has resulted in increased rents and are now out of reach for households on benefits.
- Asylum dispersal and Afgan refugee resettlement schemes have also put pressure on the Council's housing service.
- These pressures mean that the Council is currently regularly having to accommodate 120-125 households per week in emergency temporary accommodation at a considerable cost to the Council. This is again a significant increase from a typical figure of 80 households per week pre 2019/20.

5.9 Table 5.3 and 5.4 below demonstrates the year-on-year trend of increasing numbers of households placed in temporary care and increasing numbers of homeless applications received by the Council.

Table 5.3 Number of households placed in temporary accommodation 2018/19 - 2022

	01 Apr. 18 to 31 Mar. 19	01 Apr. 19 to 31 Mar. 20	01 Apr. 20 to 31 Mar. 21	01 Apr. 21 to 31 Mar. 22	01 Feb. 22 to 30 Sep. 22 (half a year)
Total number of households placed into temporary accommodation – since the commencement of the Homelessness Reduction Act in April 2018	208	333	449*	384	252

Source: Nuneaton & Bedworth Borough Council.

*2020/21 was the first year of the Covid-19 pandemic during which Nuneaton & Bedworth Council placed 52 individuals as a direct result of the 'everyone in' campaign.

Table 5.4 Number of homeless applications received per year 2010/11 – 2017/18

Year	Number of homeless applications received per year (April to March)
2010/11	150
2011/12	191
2012/13	241
2013/14	251
2014/15	260
2015/16	169
2016/17	177
2017/18	230

Source: Nuneaton & Bedworth Borough Council.

Historic affordable housing delivery

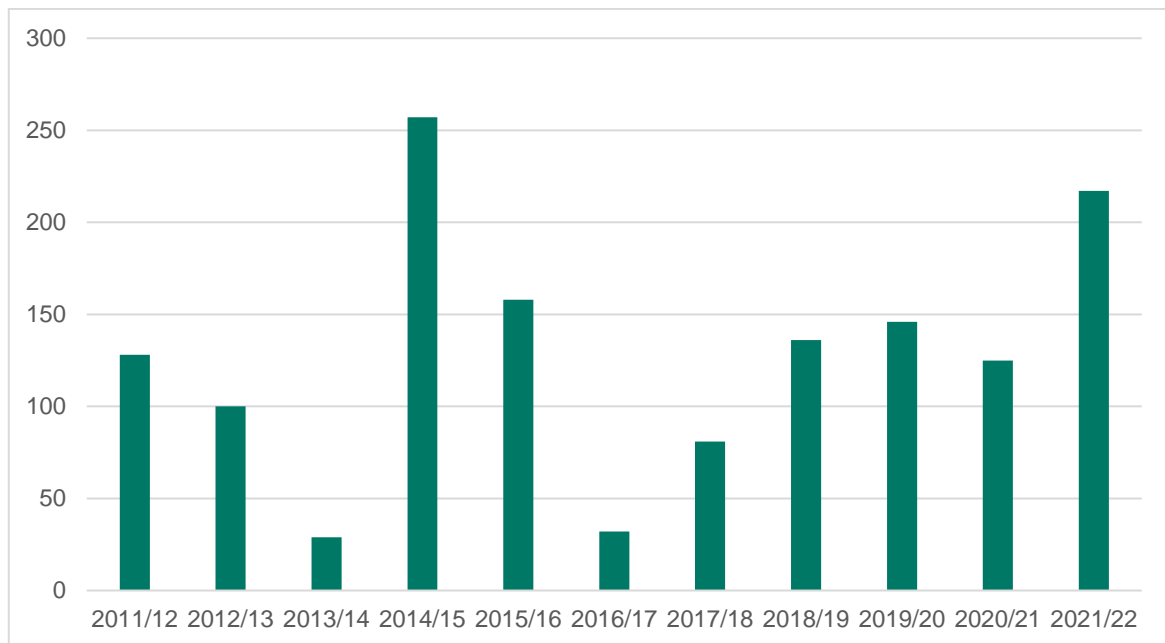
- 5.10 Table 5.5 and Figure 6.1 below show that affordable housing delivery in Nuneaton and Bedworth has varied considerably over the last 10 years, with peaks of over 200 homes completed the 2014/15 and 2021/22 monitoring periods. However, delivery has typically sat between 100 – 150 homes per annum.

Table 5.5 Nuneaton & Bedworth net affordable housing completions 2011/12 – 2021/22

Year	Affordable Rent	AF Shared Ownership / low cost	Total
2011/12	98	30	128
2012/13	74	26	100
2013/14	26	3	29
2014/15	207	50	257
2015/16	119	39	158
2016/17	30	2	32
2017/18	52	29	81
2018/19	103	33	136
2019/20	110	36	146
2020/21	55	70	125
2021/22	129	88	217

Source: Data provided by Nuneaton & Bedworth Borough Council Planning.

Figure 6.1 Nuneaton & Bedworth net affordable housing completions 2011/12 – 2021/22



- 5.11 Affordable housing delivery in net terms over the last 5 years has averaged 141 dpa in the context of overall net completions of 552 dpa. Provision at this level is meeting around a third of the annual affordable need identified.
- 5.12 Overall, the evidence suggests an acute affordable housing need in the Borough.

Viability

- 5.13 Policy H2 of the adopted Nuneaton and Bedworth sets out that the Council will seek 25% affordable housing provision in relevant residential schemes. The emerging findings of the Council's Local Plan Review Viability Study, published in June 2022, conclude that the existing borough-wide 25% affordable housing requirement continues to be broadly viable and recommends the continuation of this approach in the Council's forthcoming Local Plan Review.
- 5.14 Additional viability work undertaken by Aspinall Verdi on behalf of Nuneaton & Bedworth Borough Council to assess the deliverability of a range of key development sites within the Boroughs Town Centres. The Study concludes that viability is an issue across the Town Centres, with some sites having significant viability issues, generating large deficits, whilst others are slightly closer to a viable position. The study highlights high relative existing use value and low residential and commercial use values as particular issues contributing to viability challenges in the town centre.

Delivering affordable housing

- 5.15 The Nuneaton and Bedworth HEDNA is clear that provision of new affordable housing is an important and pressing issue in the area, particularly in the social and affordable rented sector. The affordable

housing need at 407 dpa is high relative to the overall housing need at 407- 435 dpa (Sub-Regional HEDNA). Setting the Borough Plan housing requirement at the level would see overall housing delivery fall relative to recent trends, and would constrain the ability to deliver affordable housing when the evidence points towards an increasingly urgent need for affordable housing delivery.

- 5.16 If 25% of new homes were delivered as affordable homes in accordance with the Council's emerging affordable housing policy, 1,628 dpa would be required to meet the Borough's affordable need in full. The delivery of 1,628 dpa is clearly not realistic and is significantly more than the OAN set out in the Nuneaton & Bedworth HEDNA.
- 5.17 The needs evidence would support setting a higher proportion of overall development as affordable homes; but the viability evidence shows that this is not realistic and would not support higher delivery as a percentage of overall housing provision. It illustrates that it is not deliverable to meet the affordable housing need in full with no evidence that the market could support delivery of c. 1600+ homes annually. Completions historically have never reached anything near this level.
- 5.18 However, the affordable housing need is a consideration in setting the Borough's housing target and the high level of need for affordable housing adds further evidence in support of setting a higher housing requirement set out in the Nuneaton & Bedworth HEDNA is appropriate.

6. CONCLUSION AND RECOMMENDATIONS

- 6.1 The Coventry & Warwickshire Housing Market Area HEDNA, published in October 2022 sets out a housing need for 409 dpa in Nuneaton & Bedworth. This is well below the 646 dpa set out in the draft Nuneaton & Bedworth HEDNA, published in May 2022. This difference in housing need occurs due to the use of 2021 Census data in the HMA HEDNA, which wasn't available at the time the Nuneaton & Bedworth HEDNA was produced, and the derivation of projections within the sub-regional evidence which use, for good reasons, 10-year migration trends.
- 6.2 Trend-based Forecasts from the HMA HEDNA predict that Nuneaton & Bedworth will experience the lowest level of economic growth in the HMA with growth of around 5,000 jobs over the 2021-39 period. However, there is good evidence to show that the economy could perform more strongly, and indeed having regard to the Council's economic strategy there is a strong justification for higher housing provision to align the strategies for homes and jobs in the Borough Plan Review.
- 6.3 This report has worked through the evidence on the need for employment land provision. It recommends that the draft NBBC HEDNA provides a more locally specific assessment of future needs, consider more up-to-date data on employment land completions in drawing conclusions on the industrial and warehouse need; and seems appropriate in a Borough-context given the evidence of supply constraints in the earlier part of the period considered as reflected in the Borough's previous employment land evidence. In addition, it includes some provision, in line with past trends for contributing to the sub-regional need for strategic B8 warehousing and distribution development.
- 6.4 Icenl would therefore recommend that the Borough Plan Review treats the need for 80.5 ha of employment land identified therein as an appropriate minimum level of provision. It may be appropriate to plan above this level to provide supply-side flexibility and/or if there potential to provide a higher contribution to the strategic B8 warehousing/distribution needs.
- 6.5 This report has modelled a Planned Economic Growth Scenario taking account of the expected job creation associated with the delivery of town centre regeneration schemes in Nuneaton and Bedworth Town Centres; allocated employment sites in the current Borough Plan and potential jobs growth associated with the proposed new key development site at Judkins Colliery. These are expected to deliver a significant number of new jobs and economic growth over a 10-year period that when overlain on the HMA HEDNA forecasts indicates that Nuneaton & Bedworth may see a greater level of economic growth than forecast in the HMA HEDNA. Net employment growth of 8,500 jobs is expected to 2039.
- 6.6 Alignment of housing delivery with the Council's economic strategy will ensure sustainable and resilient economic growth is achieved in accordance with the NPPF and PPG. In addition, housing

development can support development viability and delivery of key enabling infrastructure. The Planned Economic Growth Scenario would require the delivery of around 545 dpa over the period modelled (2021-39) to support the Borough's economy and align planning for homes, jobs and infrastructure. This aligns closely to a sensitivity analysis run based on more recent demographic trends which identified indicatively a need for 549 dpa, and serves to highlight the realism of this level of housing provision.

- 6.7 The need for affordable housing is high relative to the overall housing need in Nuneaton & Bedworth at 407 dpa. The affordable housing need is a consideration in setting the housing target within the Nuneaton & Bedworth Local Plan Review and the high level of need for affordable housing adds further justification for setting a housing requirement above the need identified in the sub-regional HEDNA. The evidence indicates that sustaining recent housing delivery levels is critical to enabling the Council to meet the housing needs of those in the greatest need including those in temporary accommodation and threatened with homelessness.
- 6.8 The evidence thus provides clear justification that the Council should plan for higher housing provision than the minimum housing need (409-437 dpa), and Icenl recommends 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.