

**Savills on behalf of Arbury Estate**

**Respondent ID: 106**

**Nuneaton & Bedworth Borough Plan Review MIQs**

**Matter 7 - Monitoring and Review (Block 2)**

**Policy DS7 – Monitoring of housing delivery**

**174. If housing delivery rates fail to meet the targets set out within the Plan, are the actions set out within the policy sufficient to ensure that the required housing delivery is provided during the Plan period?**

No. The actions set out in the policy are not strong enough. It should be reworded to guarantee that the housing requirement set out in the Borough Plan is delivered over the plan period.

A time limit should be set to ensure that a Borough Plan Review is undertaken and a new plan / update to the plan submitted for examination within 12 months of the deficit in housing or employment supply being identified. This is required to ensure that the Borough Plan review is positively prepared in line with paragraph 35 of the NPPF

**Policy DS8 – Review**

**176. Is the policy sufficiently clear and responsive in setting out under what circumstances a full or partial review of the Plan would be triggered?**

No, the policy is not sufficiently clear. It should be reworded to guarantee that the housing requirement set out in the Borough Plan is delivered over the plan period.

A time limit should be set to ensure that a Borough Plan Review is undertaken and a new plan / update to the plan submitted for examination within 12 months of the deficit in housing or employment supply being identified. This is required to ensure that the Borough Plan review is positively prepared in line with paragraph 35 of the NPPF

**177. Does the policy need to be more explicit about what evidence and what level of change would be required regarding housing and employment need in order to trigger a review?**

Yes. It is not clear why such a review may be required. There are a number of reasons that can be set out which require a review, they include publication of the West Midlands Strategic Employment land Study part 2, and confirmation on Coventry's unmet need in relation to housing supply.

It should also be noted that considering paragraph 226 and 227 of the current consultation version of the NPPF, it will be expected that NBBC will commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need.

This is because the annual housing requirement of the emerging Borough Plan (545 dwellings) is more than 200 dwellings less than the consultation version of the standard method which states that the annual housing requirement for Nuneaton and Bedworth is proposed to be 774 dwellings. The proposed housing requirement in the emerging Borough Plan is therefore more than 200 dwellings lower than the relevant Local Housing Need Figure.

This means that a review mechanism with a clear criteria for it to begin is required to ensure the Borough Plan review is positively prepared and in line with paragraph 35 of the NPPF.

**178. Does the policy have sufficient regard to and set out the approach to dealing with the possibility of unmet housing and employment need arising in the housing market area/region?**

The lack of an agreed position in relation to unmet housing needs is highlighted in paragraph 10.2 and 10.3 of the Duty to Cooperate Compliance Statement as an ongoing issue facing the Council.

In relation to employment, as submitted the plan fails to recognise the lack of larger / strategic sites to address both local and sub-regional need. Statements of Common Ground from both Coventry and Rugby make reference to the unknown outcome of the emerging West Midlands Strategic Employment Land Study Part 2. Whilst the findings of the study are unknown, it is evident that Nuneaton and Bedworth is at the heart of the Golden Triangle and that Coventry and Rugby have limited land available close to the M6 corridor, whereas there is land available in the Borough that should be made available in this plan for employment purposes.

Both housing and employment needs from neighbours should be agreed through an MoU with LPAs within the Coventry and Warwickshire Functional Economic Market Area. The policy should make reference to this being a requirement. Without such a policy, there is a danger that these unmet needs from neighbours are not dealt with appropriately, and that the plan is therefore not effective and deliverable over the plan period as required by paragraph 35 of the NPPF.