

## Nuneaton and Bedworth Borough Plan Review

### Hearing Statement by Marrons on Behalf of Bellway Strategic Land (part of Bellway Homes Ltd), September 2024

#### **Matter - 7 Monitoring and Review**

##### **Policy DS7 – Monitoring of housing delivery**

*173. Does the policy provide a suitable mechanism to monitor the delivery of housing throughout the Plan period? Is a more detailed housing trajectory required to do this?*

1. The policy is imprecise and ambiguous as to *when* the reviews against the trajectory will be published and what delivery rates would constitute 'falling short of what was anticipated'. If the intention is to undertake this review annual as part of the AMR process, then this should be added to the policy wording.
2. A more detailed housing trajectory would also help to address the application and implementation of this policy. Specific milestones could be added to the housing trajectory to set out when outline planning applications and reserved matters applications are to be lodged and approved for both the strategic and non-strategic site allocations. Specific backstops could then be added for commencing construction on site and site completion. If there was slippage of 12 months from one of these milestones then immediate intervention would be needed. This would be a way to help monitor housing delivery rates, beyond just annual housing completions, and allow for a more detailed understanding of which sites were the cause to any issues with the deliverable supply.

*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?*

3. A priority action would be to identify additional sites for release to meet housing needs if strategic and non-strategic allocations fail to come forward as envisaged. A list of contingency or reserve sites should be drawn up which the Council considers acceptable in-principle.

*175. Are the 4 bullet point actions set out within the policy intended to be ranked in order of preference? Is the policy sufficiently clear in this regard?*

4. The policy is not sufficiently clear. In addition, under the first bullet point, infrastructure requirements and phasing are matters that need to be understood *now*, particularly for the strategic site allocations. An understanding of infrastructure requirements and phasing is integral to soundness of the plan, its effectiveness under NPPF(c), the need

for new development to be supported by the necessary infrastructure under NPPF73 and an understanding of infrastructure requirements under National Planning Practice Guidance for Plan-making (NPPF059, Reference ID: 61-059-20190315).

#### **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?*

5. No – the policy is ambiguous – e.g. under the first bullet point, what would constitute a significant change, particularly in terms of local housing or employment needs.

*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?*

6. No, and for the reasons explained in Bellway's previous hearing statements, this is a fundamental matter of soundness which needs to be addressed as part of the current examination.

#### **Monitoring General**

*181. Should the monitoring tables include "triggers" which would alert the Council to consider a review of the relevant matter?*

7. Yes, and as explained above, triggers could relate to the delivery of strategic and non-strategic site allocations if they fail to come forward in accordance with a detailed housing trajectory.

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**Planning Director**  
**Marrons**  
**September 2024**