[redacted]

From: [redacted]
Sent: 13 October 2023 16:50
To: Planning Policy
Cc: [redacted]
Subject: NBBC Local Plan Review Regulation 19 representations from Coventry City Council
Attachments: Representation_Form_A___Personal_details__Electronic_.pdf; CCC rep form B Policy DS3 Overall development needs.pdf; CCC rep form B Policy DS4 Residential allocations.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Processed

Please find attached the representations of Coventry City Council to the Local Plan Review Regulation 19 consultation

Please note that, whilst submission of these representations has been authorised at the Cabinet Member for Housing and Communities meeting of 13/10/2023, this is subject to a call in period which ends on 20/10/23. If there are any issues arising we will ensure that you are informed as soon as possible.

Please could you acknowledge receipt

Kind regards

[redacted]
Coventry City Council
One Friargate
Coventry
CV1 2GN
[redacted]

Part B – Please use a separate sheet for each representation

Name or Organisation: Coventry City Council

3. To which part of the Borough Plan does this representation relate?

Paragraph	
Policy	DS3 Overall Development needs
Policies Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	
No	

4.(2) Sound?

Yes	
No	

4.(3) Complies with the Duty to Cooperate?

Yes	
No	x

Please mark with an 'X' as appropriate.

5. Please give details of why you consider the Borough Plan is not legally compliant, is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Borough Plan, or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Coventry City Council (CCC) has worked in partnership under the Duty to Co-operate with Nuneaton and Bedworth Borough Council and other Local Authorities and partners across the Coventry and Warwickshire sub region and beyond on a range of strategic matters including a shared evidence base.

The sub regional Coventry and Warwickshire HEDNA is a key strategic document which was commissioned jointly by the local Authorities in Coventry and Warwickshire. Coventry City Council notes the ambition of Nuneaton and Bedworth Borough Council to deliver higher levels of growth than those set out in

the joint HEDNA. CCC has no objections to this approach in principle provided that this is taken forward in the context of acknowledging that other plans in the sub region are less advanced and at various stages of production so some flexibility will need to be built in to the process.

The current Coventry City Council Local Plan (adopted December 2017) was heavily reliant on neighbouring authorities to deliver a shortfall in housing and employment provision, which Nuneaton and Bedworth assisted with by taking an additional 4,408 homes through its current Local Plan which was adopted June 2019. The apportionment of housing across the HMA to meet Coventry's shortfall was agreed through an MoU signed by the parties across the sub region. Similarly, NBBC accommodated 26 hectares of employment land to assist with a shortfall arising from Coventry.

Coventry City Council has just embarked on a review of its Local Plan – the Regulation 18 stage of the review concluded on 29th September 2023. Much work is yet to be undertaken on this plan and capacity levels are not yet fully understood in terms of whether a shortfall will still apply whereby the Council may need to engage with neighbouring authorities to assist with this. It is the Councils aim (as set out in its Regulation 18 consultation documents) to try and meet its needs as fully as possible within its own boundaries however this cannot be concluded at this stage. The reference to figures in the NBBC Regulation 19 plan as 'minimum' is therefore supported.

In terms of setting a figure for Strategic B8, it should be noted that table 15.2 on page 333 of the HEDNA cites a figure of 551 hectares across the sub region between 2021 and 2041 and Chapters 10 and 11 provide the context. The indicative proposed contribution of 19.4 hectares is welcomed but it should be a minimum as joint work is currently ongoing across the West Midlands region in this regard and the outcome of the emerging West Midlands Regional Strategic Employment Sites Study is not yet known.

In terms of plan resilience and overall growth, it is noted that two strategic allocations from the current adopted plan (HSG4 and HSG7) are no longer proposed for allocation through the reviewed plan. Whilst it is understood from discussion that this is because they are now the subject of planning applications / have resolution to grant and therefore form part of the committed supply, they are not yet built out.

It is also noted that the Sustainability Appraisal in paras 8.2.6 - para 8.2.8 states '*The Council consider that these sites are not likely to form a reliable source of supply, but it is noted that there are planning applications submitted / developer interest in their release (whether partial or complete)….. Whilst these sites would not be required to meet housing delivery, they could deliver additional flexibility in the longer term should circumstances change'*.

Para 8.2.6 (2) of the SA references the need to test a 'higher growth' scenario as a 'reasonable alternative. It states:

'*The draft Plan plus existing allocations HSG4 and HSG7 (illustrated on Figure 8.2). This approach would retain all of the existing strategic housing allocations as well as identifying additional sites in the urban area that offer a different scale of development and range of choice. Given that there would be two additional sites, the overall scale of growth would be higher under this option compared to the draft Plan (i.e. any additional growth anticipated to come forward in the Plan period at HSG4 and HSG7).*'

It is also noted that the 'higher growth' option which retains the two strategic allocations HSG4 and HSG7 does not result in any major significant negative effects as assessed through the SA and the differences between the two growth scenarios appear minor.

Given that other plans across the Housing Market Area are at earlier stages of production, and that Coventry City Council has not at the time of writing undertaken detailed capacity work to enable it to conclude whether it has a shortfall in either housing or employment land supply which would enable it to absorb its own growth needs, it is important that more advance plans in the HMA provide sufficient flexibility to be able to adapt to changes in circumstances as they evolve. This is an issue which the SA has highlighted as set out above.

Whilst it is for Nuneaton and Bedworth Council to determine exactly which sites it wishes to include in its reviewed plan, it seems clear that the 'lower growth' of the two scenarios put forward (albeit the lower of the two being still higher than the 'minimum' growth levels set out in the joint sub-regional HEDNA) is intended purely to address local need and ambition for Nuneaton and Bedworth Borough. The plan still needs to include flexibility which could be accommodated during the plan period as explained in the paragraph above. Retaining allocations HSG4 and HSG7 would appear to provide a simple opportunity for such flexibility but other options could be considered if the Council felt these might be more appropriate: potential allocations as 'reserve sites' might be a possible alternative option in case additional growth – as yet undetermined – was required.

Notwithstanding the above, Coventry City Council would emphasise the importance of ensuring that there should be no coalescence between the settlements of Nuneaton and Coventry to retain their distinctive geographies and character and to prevent urban sprawl.

Coventry City Council re-iterates its commitment to collaborative working under the Duty to Co-operate which includes proactive working between Nuneaton and Bedworth Borough Council and Coventry City Council on matters relating to air quality and traffic management.

However, notwithstanding the ongoing work across the sub region, given the absence of a Statement of Common Ground at the point of writing we do not consider at this point that the Regulation 19 process is currently fully compliant with the requirements of the Duty to Co-operate.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Borough Plan legally compliant or sound, having regard to the matter you have identified in part 5 above, where this relates to soundness (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Borough Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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opportunity to make further representations based on the original representation at the publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination **Yes if needed**	x

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9.

Signature: (Please sign the box if you are filling in a paper copy. If you are filling in an electronic copy, the box can be left blank)	
Date:	13/10/2023

Part B – Please use a separate sheet for each representation

Name or Organisation: Coventry City Council

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Paragraph	
Policy	DS4 Residential allocations
Policies Map	

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Yes	
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This representation should be read in conjunction with our representation on Policy DS3.

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Date:	13/10/2023

Nuneaton & Bedworth United to Achieve	**Borough Plan Review** Publication Stage Representation Form	**Ref:** **(For official use only)**

Name of the Local Plan to which this representation relates:

Borough Plan Review Publication Stage

Please return to Nuneaton and Bedworth Borough Council by 16th October 2023 via:

Email: planning.policy@nuneatonandbedworth.gov.uk

Post: Planning Policy, Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, NUNEATON, CV11 5AA

This form has two parts –

Part A – Personal details.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	1. Personal details* * If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.	**2. Agent's details (if applicable)**
Title	[redacted]	
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)	**Coventry City Council**	
House no. and street	**One Friargate**	
Town	**Coventry**	
Postcode	**CV1 2GN**	
Telephone number	[redacted]	
Email address (where relevant)		