

Nuneaton & Bedworth Borough Plan Review

Hearing Statement: Coventry City Council

Matter 2

This Hearing Statement specifically responds to those Matters and Issues relevant to the representations submitted by Coventry City Council (CCC) to the Regulation 19 consultation, and to the subsequent Statement of Common Ground between Coventry City Council and Nuneaton and Bedworth Borough Council (NBBC) January 2024.

Matter 2, Question 27: Does the development strategy in general, and Strategic Policy DS3 incorporate sufficient flexibility within it? Particularly with regard to the potential for unmet housing and employment need arising from neighbouring areas in the future.

CCC has worked in partnership under the Duty to Cooperate with NBBC 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. CCC notes the ambition of NBBC 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 CCC Local Plan (adopted December 2017) was heavily reliant on neighbouring authorities to deliver a shortfall in housing and employment provision, which NBBC 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 is reviewing its Local Plan – the Regulation 18 stage of the review concluded on 29th September 2023 and work is underway as set out in the Local Development Scheme (February 2024) to ensure the plan is able to meet the Government deadline of submission by June 2025. Work is currently ongoing on the evidence base including detailed capacity assessment. At the time of writing, due to the ongoing assessment process it has not been confirmed 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 the time of writing. 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.

In terms of plan resilience and overall growth for housing, two strategic allocations from the current NBBC adopted plan (HSG4 and HSG7) are no longer proposed for allocation through the reviewed plan. Whilst it is understood that this is because they are now the subject of planning applications / have resolution to grant and therefore have been included as part of the committed supply, these remain work in progress and are not yet complete, nor close to being so.

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'*.

The emphasis upon flexibility is key, and the approach to these sites remains an area of disagreement as set out in the Statement of Common Ground, which states that NBBC has received a planning application for 150 units on part of the HSG4 site and HSG7 has planning permission for 230 units. Notwithstanding this, and irrespective of the overall buffer cited in the SoCG (some of which would, in any case be needed to provide certainty for delivery of NBBCs own proposed needs) the sites in question are not yet fully consented or in the process of being built out and therefore it is not understood why their allocation status is proposed to be removed when this would afford the plan and the wider HMA some additional resilience.

Matter 2 Question 30: has the development strategy been fully informed by the SA and other evidence? Is it soundly based? Does it accord with the Framework?

As set out in our response to Question 27 The SA (paras 8.2.6 - .8.2.8) recommends that the allocation of sites HSG4 and HSG7 should be retained as allocations to deliver additional flexibility. Whilst CCC notes that these sites are now in the committed supply (notwithstanding CCC's views that these should remain as allocations for the reasons set out above) and thus appear to accord with the 'higher growth scenario' referred to in the SA (in terms of overall numbers), achieving that scenario is vital in terms of providing resilience and flexibility.

Matter 2 Question 31: is the site selection process clear and suitably robust, supported by the SA and other evidence, with particular regard to the proposal to not allocate some sites that are allocated in the adopted plan.

As set out in our response to Question 27, CCC considers that sites HSG4 and HSG7 should be retained as allocations to provide certainty and resilience to the plan, including the need to provide flexibility as other plans in the HMA emerge.