



Written Statement 2

Nuneaton and Bedworth Borough Local Plan Review Examination

ON BEHALF OF CEG

June 2024

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1. Matter 2 – Vision, Strategic Objectives and Development Strategy

Issue 1: Have the vision and strategic objectives been positively prepared, are they justified and consistent with national policy, and can all be realistically achieved?

Q23. Do the vision and strategic objectives have regard to and provide for the development needs of the area as well as any identified unmet needs in neighbouring areas?

- 1.1 The vision and strategic objectives do not have regard to, and provide for, any unmet needs arising from neighbouring authorities, particularly Coventry City. This is because of the uncertainty around the level of unmet need resulting from a failure to comply with the Duty to Cooperate. Whilst this issue needs to be resolved at the earliest opportunity, it should be noted that the Nuneaton and Bedworth Local Plan Review does not currently include any mechanism to address any unmet needs arising from Coventry City, such as commitment to an early review, identification of safeguarded land or an alternative policy mechanism to release additional land. As such, for a sound approach, CEG believe that the Council needs to accelerate discussions under the Duty to Cooperate now to positively deal with Coventry's unmet need.

Q24. Does the Plan address/meet any identified unmet needs in neighbouring areas? If not, why not?

- 1.2 No, the plan does address unmet needs from neighbouring areas, particularly Coventry City which is heavily constrained and has had longstanding issues with meeting its needs within its administrative boundary. It is important to note that Coventry has previously been unable to meet its housing need which informed agreement of an MOU between the component authorities in 2015. This distributed the unmet housing need within CWHMA. Therefore, it is considered highly likely that over the plan period Coventry, when planning for its full housing need under the standard method, will not be able to meet its housing need within its boundary.
- 1.3 Clarity on the level of unmet need and an appropriate spatial distribution within the housing market area through an effective Memorandum of Understanding is therefore essential to allow the plan to proceed. Without such clarity, there is significant risk that the housing needs of the housing market area will not be met.

Issue 2: Has the development strategy and the overall distribution of development been positively prepared, is it justified by a robust and credible evidence base, and is it consistent with national policy?

Q27. 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.

- 1.4 Strategic Policy DS3 – Overall Development Needs does not incorporate sufficient flexibility with regard to the potential for unmet housing and employment need arising from neighbouring areas, particularly Coventry City Council. Strategic Policy DS3 states that Nuneaton and Bedworth Borough will make provision for a minimum of 9,810 dwellings between 2021 and 2039. However, the policy, and the plan as a whole, does not make any provision to contribute to meeting any of Coventry's unmet need. CEG therefore objects to Strategic Policy DS3.
- 1.5 The Towards a Housing Requirement ('THA') (EB8) report recommends the 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. However, this figure is identified without any clarity on the extent of unmet need arising from Coventry City.

- 1.6 Whilst it is acknowledged that the extent of unmet needs arising from Coventry are still unknown, the joint HEDNA covering the whole of the CWHMA was completed in 2022 and Coventry City are progressing their own local plan review, which includes an updated assessment of housing land supply. Therefore, it is clear that the information is now available to allow all the partner authorities to have a clear understanding of the level of unmet need arising from Coventry, which can inform an updated MoU. This will then allow Nuneaton and Bedworth Plan to proactively plan for the unmet need from Coventry. Until then however, Policy DS3 is not effective, nor has it been positively prepared and is therefore unsound.
- 1.7 CEG's position is that the Nuneaton and Bedworth Borough Plan Review lacks the ability and therefore flexibility to proactively plan for the unmet need from Coventry. As such Policy DS3 is not effective, nor has it been positively prepared and is therefore unsound.

Nexus Planning

Birmingham
Interchange Place
151-165 Edmund Street
B3 2TA

T 0118 214 9340

nexusplanning.co.uk