

**Nuneaton and Bedworth Borough
Council
Borough Plan Review (2021 -
2039)**



Statement of Common Ground between
Nuneaton and Bedworth Borough Council
and Coventry City Council

January 2024

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Organisations

- Nuneaton and Bedworth Borough Council (NBBC).
- Coventry City Council (CCC).

Introduction

This Statement of Common Ground identifies areas of agreement and disagreement between NBBC and CCC in relation to the Borough Plan Review (2021-2039) and supporting evidence base. This Statement has been prepared to assist the Examination of the Plan and covers the administrative area of NBBC.

The Borough is located between Coventry and Hinckley and benefits from good road links. Nuneaton and Bedworth are both easily accessible from the M6 which gives good access to the M1, M5, M42 and M69. The A5 runs along the northern boundary of the Borough and the A444, A4254 and the B4114 are the major routes within the Borough. The Borough is home to 134,200 people according to the Census 2021. A plan has been provided at Appendix A which outlines the administrative boundary of NBBC alongside the location of sub-regional and adjoining Local Planning Authorities.

NBBC has fully engaged with CCC on the development of the Council's respective Local Plans from the outset. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, CCC has been formally consulted at every stage of consultation on the Borough Plan Review together with its accompany Sustainability Appraisal and the Habitat Regulations Assessment. CCC made representations to all three stages of consultation on the Borough Plan Review (representation number 2 in relation to the Regulation 19 consultation). The Duty to Cooperate Compliance Statement outlines in detail the engagement activities and outcomes, together with the joint evidence base studies undertaken during the Plan's preparation.

Strategic matters

Areas of Agreement

- **That NBBC has worked collaboratively with CCC to ensure that all cross-boundary strategic issues have been properly considered and where appropriate reflected in the Borough Plan Review and effective and on-going joint working has and will continue to be undertaken.**

Housing Requirements

NBBC has worked with adjoining and nearby local authorities within the Coventry and Warwickshire Housing Market Area (HMA) (CCC, North Warwickshire Borough Council, NBBC, Rugby Borough Council, Warwick District Council, Stratford-on-Avon District Council and Warwickshire County Council) to consider and agree how the needs of the HMA will be met.

From the joint evidence base study undertaken on behalf of local authorities in the sub-region - the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (2022) – alongside NBBC’s Towards a Housing Requirement evidence base study, NBBC states that the housing requirement for the Borough can be achieved fully, over the plan period, as outlined in the Borough Plan Review. CCC notes the ambition of NBBC to deliver higher levels of growth than those set out in the joint HEDNA and has no objections to this approach in principle (545 dwellings per annum instead 409 as required in the Coventry and Warwickshire HEDNA (2022)). However, this should be 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 into the process. This has been achieved, in the Borough Plan Review, by stating that the housing requirements for the Borough are ‘minimum’ requirements (Strategic Policy DS3) providing the flexibility to meet the needs of the Borough and potentially neighbouring authorities’ unmet needs, over the plan period. There have been no requests for NBBC to meet the housing needs of any neighbouring authorities so far.

NBBC has been leading on a draft Memorandum of Understanding with the other local authorities within the Coventry and Warwickshire HMA. This draft Memorandum of Understanding details matters of strategic importance relevant to all authorities, specifically relating to housing and employment needs, across the HMA. As CCC has just embarked on a review of its Local Plan – the Regulation 18 stage of the review concluded on 29th September 2023 – CCC aims to meet its needs as fully as possible within its own boundaries. However, this cannot be concluded at this stage.

The draft Memorandum of Understanding is being prepared to reflect that all local authorities represented within the Coventry and Warwickshire HMA are at different stages of reviewing their Local Plans or are not reviewing them at all, at this time. This also provides the flexibility for future joint working and amendments to the draft Memorandum of Understanding once unmet needs are identified and Plans progress.

Employment requirements

CCC welcomes the indicative proposed contribution of 19.4 hectares of strategic B8 warehousing and distribution as a ‘minimum’ requirement, within the Borough Plan Review, due to joint work, which is currently ongoing across the West Midlands region, and the unknown outcome of the emerging West Midlands Regional Strategic Employment Sites Study.

NBBC has planned to meet its objectively assessed need for employment through its Plan policies, informed by working with the wider HMA (Coventry and Warwickshire HEDNA (2022)). There have been no requests for NBBC to meet the employment needs of any neighbouring authorities so far.

Areas of Disagreement

Retention of two strategic allocations, HSG4 and HSG7, from the adopted Borough Plan (2011-2031)

Given that other plans across the HMA are at earlier stages of production, it is unclear if there will be a shortfall in either housing or employment land supply in other local authority areas, within the HMA. CCC believe that it is important for more advanced plans within the Coventry and Warwickshire HMA to provide sufficient flexibility to be able to adapt to changing circumstances as they evolve. Therefore, CCC suggested through its representations that NBBC retain allocations HSG4 and HSG7, but other options could be considered to provide flexibility.

However, NBBC does not agree with retaining these two sites, within the Borough Plan Review, as strategic allocations. NBBC has received a planning application for 150 units on part of the HSG4 site and HSG7 has planning permission for 230 units. Therefore, both sites will still form part of NBBC's committed supply without being strategic allocations.

Notwithstanding this, CCC maintains its disagreement with this approach, commenting that until sites have been fully consented and completed, there remains uncertainty in the planning process, and retaining the allocations would provide that additional assurance.

The Borough Plan Review outlines the total housing supply for the plan period comprising of 12,127 units which is in excess of the minimum of 9,810. NBBC consider this to be a significant buffer (23%) providing flexibility, within the plan period, in the unforeseen event that some identified sites do not come forward, or potentially to contribute towards neighbouring authorities' unmet needs over the plan period.

Further joint working

This Statement of Common Ground will be kept up to date through continuous engagement and cooperation between NBBC and CCC. Joint working will continue to take place through the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) group and through the continued progression of the draft Memorandum of Understanding between the Coventry and Warwickshire HMA authorities.

Monitoring

This Statement will be maintained by NBBC and updated as necessary with CCC.

NBBC will continue to work with CCC beyond the adoption of the Borough Plan Review for the monitoring and implementation of the Plan.

Signatories

Signature: 	Signature: 
Maria Bailey, Assistant Director for Planning, NBBC	Rob Back Strategic Lead for Planning Coventry City Council
Date: 22/01/24	Date: 23/01/2024

Appendix A

North
Warwickshire
Borough

Hinckley and
Bosworth Borough

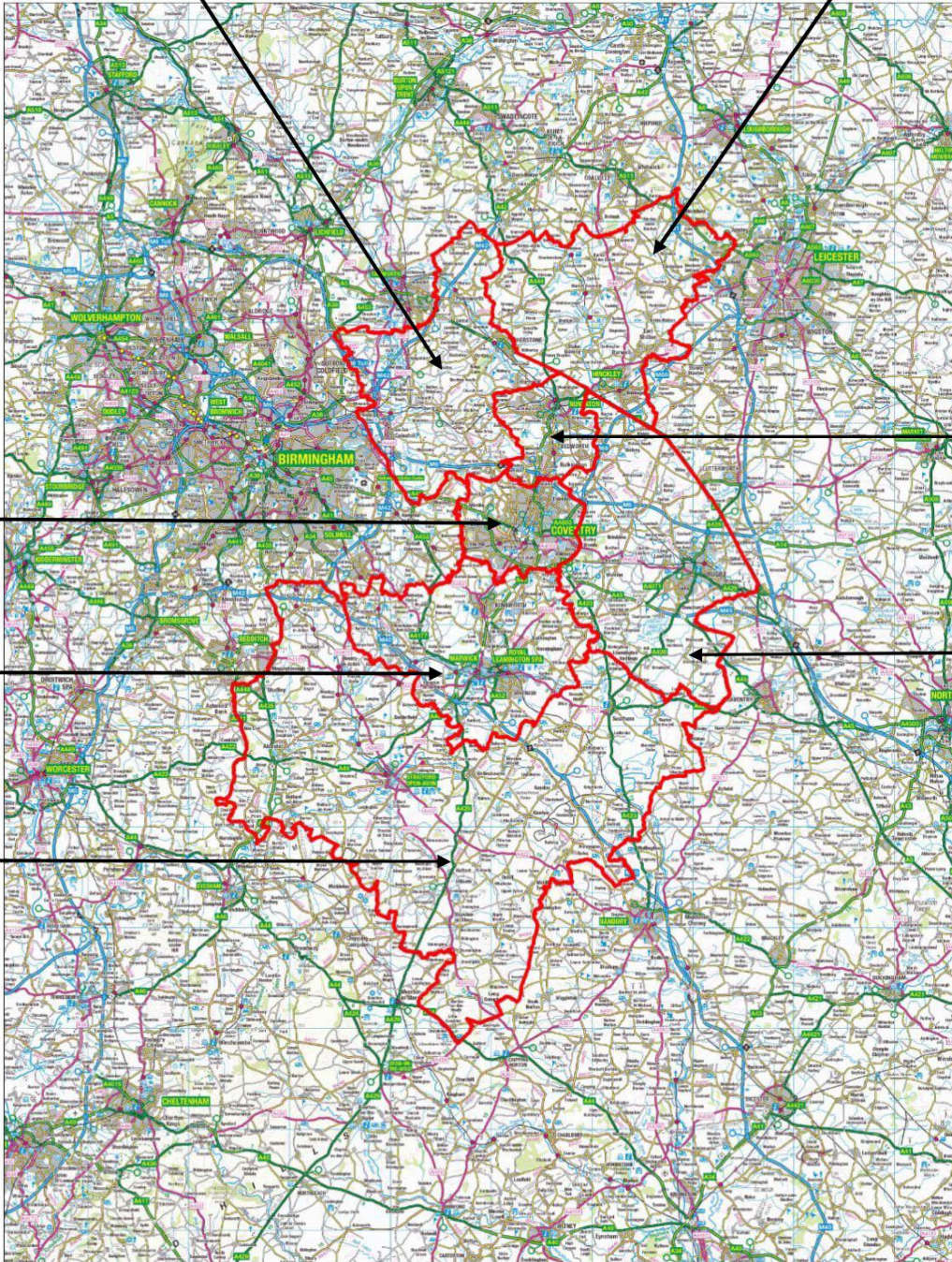
Coventry
City

Nuneaton
and
Bedworth
Borough

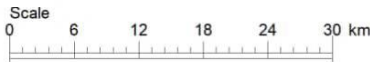
Warwick
District

Rugby
Borough

Stratford-
on-Avon
District



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