



### **Cabinet Member for Housing and Communities**

---

**Time and Date**

2.00 pm on Friday, 13th October, 2023

**Place**

Diamond Room 5 - Council House

---

**Public Business**

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 10)
  - a) To agree the minutes of the meeting held on 17 March 2023
  - b) Matters arising
4. **Nuneaton and Bedworth Borough Council (NBBC) Regulation 19 Borough Plan Consultation Response** (Pages 11 - 26)

Report of the Director of Streetscene and Regulatory Services
5. **Outstanding Issues**

There are no outstanding issues
6. **Any other item of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved**

**Private Business**

Nil

---

Julie Newman, Chief Legal Officer, Council House, Coventry

Thursday, 5 October 2023

Note: The person to contact about the agenda and documents for this meeting is Usha Patel Governance Services Officer, Email: [usha.patel@coventry.gov.uk](mailto:usha.patel@coventry.gov.uk)

Membership: Councillors S Agboola (Deputy Cabinet Member) and D Welsh (Cabinet Member)

By invitation: Councillors R Bailey and M Lapsa (Shadow Cabinet Members)

Public Access Any member of the public who would like to attend the meeting in person is encouraged to contact the officer below in advance of the meeting regarding arrangements for public attendance. A guide to attending public meeting can be found here: <https://www.coventry.gov.uk/publicAttendanceMeetings>

**Usha Patel**  
**Governance Services Officer**  
**Email: [usha.patel@coventry.gov.uk](mailto:usha.patel@coventry.gov.uk)**

**Coventry City Council**  
**Minutes of the Meeting of Cabinet Member for Housing and Communities held at**  
**11.00 am on Friday, 17 March 2023**

Present:

Members: Councillor D Welsh (Chair)  
Councillor R Bailey (Shadow Cabinet Member)  
Councillor M Lapsa (Shadow Cabinet Member)  
Councillor S Nazir (Deputy Cabinet Member)

Other Members: Councillor L Bigham (Chair of Communities and Neighbourhoods Scrutiny Board (4))  
Councillors J Birdi, T Jandu and S Keough (Bablake Ward Councillors) – for Minute 21 below

Employees Present:

Law and Governance: O Aremu, U Patel

Streetscene and Regulatory Services: C Stranks, A Walster (Director)

## **Public Business**

### **18. Declarations of Interest**

It was noted that Councillor R Bailey and Councillor S Nazir had a standing 'Other Interest' as they are both Members of the Planning Committee. As they were present at the meeting in a non-decision making capacity as Shadow Cabinet Member and Deputy Cabinet Member respectively, they remained in the meeting.

### **19. Minutes**

The minutes of the meeting held on 5 December 2022 were agreed and signed as a true record. There were no matters arising.

### **20. Local Listing Nominations - Process Review**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided information on the outcome of the Local Listing process review.

The City Council has an established nomination process for the nomination of additions to the local List of Heritage Assets which is available on the Council's website. This established process was reviewed to ensure that the route to, and assessment of, nominations may be best managed in line with available Council resource and planning policy.

Locally listed buildings are buildings and sites within the local planning authority's area which make a positive contribution to its local character and sense of place because of their heritage value.

Whilst these buildings or sites may not be nationally designated, the Local List identification of these sites and their significance then merits consideration in future planning decisions.

The City Council have maintained a Local List of Buildings of Special Architectural and Historic Interest since (at least) June 1974. The list has evolved over time as nominations have been considered and if endorsed, places onto the register.

The creation and maintenance of a Local List is a way to identify and celebrate historic buildings and sites which enrich an area, which also contributes to the promotion of Coventry as a visitor destination and centre for the arts and culture.

The nomination process establishes key criteria for the consideration of inclusion to the Local List and applicants must demonstrate how the nomination meets the prescribed criteria. If the criteria is met, the nominations would be considered by officers alongside views being sought from the public. The final stage in the process would be a recommendation to the Cabinet Member for determination.

The process presents a robust assessment criteria for nominations, however, it also currently presents challenges in respect of the allocation of specialist resource, in that every nominations that meets the criteria would proceed to public consultation stage, which may impact wider organisational priorities.

The report proposed that in order to maintain a deliverable process, the Urban Design and Heritage Manager be required to review and approve the appropriateness of undertaking the consultation process, prior to views being sought and decision making phases being enacted. As a result of the revision, nominations may be considered in line with available resource requirements and alongside planning policy and strategic considerations, ahead of public consultation.

**RESOLVED that the Cabinet Member:**

- 1) Endorses the revision to the Local Listing process.**
- 2) Delegates authority to the Head of Planning Policy and Environment, to finalise the details and publication of the updated Local Listing nomination process.**

**21. Local Listing Nomination - Allesley Hotel, Birmingham Road, Allesley**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided information on the Local Listing Nomination in respect of the Allesley Hotel, Birmingham Road, Allesley.

Further to the receipt of a nomination for the addition to the local list of the former Allesley Hotel, public consultation was undertaken between 2 August and 14 September 2022. Five responses were received, two were supportive of the listing and three were objecting. The report provided further information on the responses received.

The report indicated that whilst the nomination received referred to the entirety of the Allesley Hotel, the assessment undertaken found that only the more historic element of the property which immediately fronts the Birmingham Road is worthy of consideration for local listing. Internal works undertaken at the point of its conversion to a hotel use were understood to have further eroded some of the internal historic interest, notwithstanding this, some features of historic interest still remained.

The report concluded that it was accepted that the building's evolution had eroded some of its historic interest, however, the frontage and form of the property is nevertheless seen to make its own distinctive contribution to the character of the wider Conservation Area, alongside which, further research in establishing the architectural history and family connections of the property may yield a further richness to the story of the site and property, and indeed therefore to the understanding and appreciation of the wider Conservation Area.

In recognition of this, the element of the former hotel fronting the Birmingham Road is seen as a worthy addition to the local list of heritage assets, however later extension elements to the site's interior are not considered to meet the necessary criteria for local listing. It was therefore suggested that a local listing designation be limited to the elements of built form contained within the red line as identified in plan area at paragraph 1.15 of the report.

Councillors J Birdi, T Jandu and S Keough, Bablake Ward Councillors attended the meeting and spoke in respect of the nomination. They raised the following matters:

- Anti social behaviour and vandalism at the site
- Residents' concerns over the safety of children accessing the building
- Lack of consultation with residents and Ward Councillors
- Residents feel unsafe due to comings and goings at the site, often late at night

The Chair of the Allesley and Coundon Wedge Conservation Society attended the meeting and was given an opportunity to speak by the Cabinet Member. He stated that the site was not secure as the steel bollards blocking the entrance could easily be removed. The building was derelict with part of the roof missing and is a danger to the children who go in there. He questioned the value of the mock Tudor frontage commented that the residents considered it to be an eyesore. He referred to the lack of consultation and engagement in relation to the local listing as none of the residents were aware of it. He summed up by stating that the residents will do everything they could to ensure that the replacement building fits in with the conservation area.

Members present at the meeting questioned the consultation undertaken and whether the Ward Members were informed. They accepted that the building was derelict and that it was a safety risk to anyone who accesses it. They noted that there was no planning application for the site as yet, however, when one is submitted and consulted on, the residents would have an opportunity to comment.

The Cabinet Member, having considered the report and the representations made at the meeting was mindful of the residents' concerns, but was also mindful not to

allow the state of the building to cloud his judgement. He understood the situation at the hotel and that it was an integral part of the village, however he questioned whether local listing was the right course of action. The Cabinet Member accepted that the site was going to prove to be a challenge to the developer regardless of the decision. The Cabinet Member indicated that he would welcome a meeting with the developer to discuss future plans for the site.

**RESOLVED that the Cabinet Member, having considered the report and the representations made at the meeting, decided not to part-endorse the nomination for Allesley Hotel, Birmingham Road, to be added to the local list.**

22. **Local Listing Nomination - Former Coronet Cycle Works, Far Gosford Street**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided information on the local listing nomination received in respect of the former Coronet Cycle Works, Far Gosford Street.

Further to the receipt of a nomination for the addition to the local list of No 84-88 Far Gosford Street, public consultation was undertaken between 3 August and 14 September 2022. Two responses in support of the nomination were received, with the Coventry Society citing the buildings link to the City's motoring heritage as being worthy of recognition.

**RESOLVED that the Cabinet Member:**

- 1) **Endorses the nomination for the Former Coronet Works, Far Gosford Street to be added to the local list, for the reasons set out in the report.**
- 2) **Delegates authority to the Head of Planning Policy and Environment, following consultation with the Cabinet Member for Housing and Communities, to finalise the details of the designation.**

23. **Local Listing Nomination - St Columba's Church**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided information on the local listing nomination received in respect of St Columba's Church.

Further to the receipt of a nomination for the addition to the local list of St Columba's Church, public consultation was undertaken from 3 August to 14 September 2022. Two responses in support of the nomination were received.

**RESOLVED that the Cabinet Member:**

- 1) **Endorses the nominations for St Columba's Church to be added to the local list, for the reasons set out in the report.**
- 2) **Delegates authority to the Head of Planning Policy and Environment, following consultation with the Cabinet Member for Housing and Communities, to finalise the details of the designation.**

24. **Local Listing Nomination Report - 42 Britannia Street**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided information on the local listing nomination received in respect of 42 Britannia Street.

Further to receipt of a nomination for the addition to the local list of No 42 Britannia Street, public consultation was undertaken between 3 August and 14 September 2022. Two responses were received, one in support and one objecting to the nomination. The Coventry Society wrote in support of the nomination and noted the properties links to the Co-operative Society and the Society's importance in the city's social and economic history. The response that objected stated that the site should be repurposed or demolished to make way for residential development.

**RESOLVED that the Cabinet member declines the nomination for 42 Britannia Street to be added to the local list, for the reasons set out in the report.**

25. **Local Listing Nomination Report - Former Paris Cinema, Far Gosford Street**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided information on the local listing nomination received in respect of the former Paris Cinema, Far Gosford Street.

Further to the receipt of a nomination for the addition to the local list, a public consultation was undertaken between 3 August and 14 September 2022. Three responses were received, two in support noting the contribution to local identity and therefore advocating its retention/rescue; whilst the objection stated the site should undergo redevelopment.

**RESOLVED that the Cabinet Member declines the nomination for the reasons set out in the report.**

26. **Local Listing Nomination Report - Charles Ward and George Eliot Building**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided information on the local listing nomination received in respect of the Charles Ward and George Eliot Buildings.

Further to the receipt of a nomination for the addition to the local list, public consultation was undertaken from 3 August to 14 September 2022. Three responses were received, one stating that the site should be utilised for educational use, alongside another, whilst supportive of local listing noting the recent decision against the national listing of the properties.

**RESOLVED that the Cabinet Member declines the nominations for the Charles Ward and George Eliot Building to be added to the local list, for the reasons set out in the report.**

27. **Local Listing Nomination Report - No. 1 New Union Street**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided information on the local listing nomination received in respect of No. 1 New Union Street.

Further to the receipt of a nomination for the addition to the local list of No.1 New Union Street, public consultation was undertaken from 3 August to 14 September 2022. Two responses were received, both in support of the nomination. The Coventry Society suggested that as No.1 forms part of a terrace, the whole of the terrace should be listed. However, only what is mentioned within the nomination can be considered.

**RESOLVED that the Cabinet Member declines the nomination for No.1 Union Street to be added to the local list for the reasons set out in the report.**

28. **Local Listing Nomination Report - Optical Art Mural, Bull Yard**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided information on the local listing nomination received in respect of Optical Art Mural, Bull Yard.

Further to the receipt of a nomination for the addition to the local list of an optical art mural, public consultation was undertaken between 3 August and 14 September 2022. Two responses in support of the nomination and one against were received.

Whilst the members present acknowledged that the mural did not have any historic or cultural significance, they requested that it be saved and accommodated within the City Centre South development, if possible. The Director of Streetscene and Regulatory Services indicated that he would pass on members comments.

**RESOLVED that the Cabinet Member declines the nomination for the Optical Art Mural, Bull Yard, to be added to the local list, for the reasons set out in the report.**

29. **Local Listing Nomination Report - Sir Guy and the Dun Cow Sculpted Relief**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided information on the local listing nomination received in respect of Sir Guy and the Dun Cow sculpted relief.

Further to the receipt of a nomination for the addition to the local list of the Sur Guy and Dun Cow sculpted relief, a public consultation was undertaken between 3 August and 14 September 2022. Three responses were received in total, two in favour and one opposing.

The nomination met a number of criteria for local listing as it demonstrated distinct links to the city's history, whilst stylistically and in its initial commission it is closely linked to an important period of development in the city. It was accepted that the piece would be required to be relocated in the delivery of consented



redevelopment schemes, however, this also offered an opportunity to deliver an improved situation for the relief.

It was noted that the relief was already considered as being worthy of relocation within the city centre south development.

**RESOLVED that the Cabinet Member declines for the nomination for Sir Guy and the Dun Cow sculpted relief to be added to the local list for the reasons set out in the report.**

30. **Outstanding Issues**

There were no outstanding issues.

31. **Any other item of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved**

There were no other items of business.

(Meeting closed at 12.05 pm)

This page is intentionally left blank



## Public report Cabinet Member Report

---

Cabinet Member for Housing and Communities  
13<sup>th</sup> October 2023

**Name of Cabinet Member:**

Cabinet Member for Housing and Communities – Councillor D Welsh

**Director Approving Submission of the report:**  
Director of Streetscene and Regulatory Services

**Ward(s) affected:**  
All Wards

**Title:**  
Nuneaton and Bedworth Borough Council (NBBC) Regulation 19 Borough Plan consultation response

---

**Is this a key decision?**

No – the proposals contained in this report at this stage will not be significant in terms of its effect on communities living or working in an area comprising 2 or more wards in the area of the City

---

**Executive Summary:**

Nuneaton and Bedworth Borough Council are currently consulting at regulation 19 stage of their draft Borough Plan. With Coventry City Council bounding the authority, a response to the draft plan is proposed at Appendix One. Whilst matters in the plan relate to the area within NBBC's authority boundary, given the neighbouring location, Coventry City Council propose a response to the consultation to recognise potential impacts across local authority boundaries.

Within the local plan review process Coventry City Council currently propose to utilise the jointly commissioned HEDNA which utilises 2021 Census Data to calculate housing and economic development needs, whilst challenging the government's 35% uplift. Should this approach be rejected by the planning inspectorate, the authority may then require the support of neighbouring authorities.

**Recommendation:**

The Cabinet Member is requested to:

- 1) Endorse the response to the consultation included at appendix one for submission to Nuneaton and Bedworth Borough Councils regulation 19 consultation.
- 2) Delegate authority to the Head of Planning Policy and Environment, following consultation with the Cabinet Member for Housing and Communities, to make any non-substantive changes to the response.
- 3) Support that should Nuneaton and Bedworth Borough Council proceed with the submission of its Borough Plan to the Planning Inspectorate without addressing the concern raised by the Council, a further report be brought back to a meeting of the Cabinet Member for Housing and Communities and/or Cabinet to consider whether it should object at Nuneaton and Bedworth Borough Council's Plan Examination.

**List of Appendices included:**

Appendix One – Draft Coventry City Council response to NBBC Reg 19 borough plan consultation

**Background papers:**

Coventry City Council Local Plan 2017

**Other useful documents**

N/A

**Has it been or will it be considered by Scrutiny?**

No

**Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?**

No

**Will this report go to Council?**

No

## **Report title: NBBC Borough Plan Regulation 19 consultation response**

### **1. Context (or background)**

- 1.1 Coventry City Council has prepared a response to Regulation 19 consultation of Nuneaton and Bedworth Borough Councils consultation of its draft Borough plan, the deadline for consultation responses is set as the 16<sup>th</sup> October 2023.
- 1.2 The draft NBBC Borough Plan identifies which sites it proposes for allocation, and comment is therefore made around policies DS3 'Overall Development Needs' and DS4 ' Residential allocations.
- 1.3 The current Coventry City Council Local Plan (2017) was reliant on neighbouring authorities in delivery of shortfall in housing and employment provisions, where Nuneaton and Bedworth Borough Council contributed 4,408 homes through its current plan, which was adopted in June 2019.
- 1.4 Coventry City Council are currently underway in reviewing its own 2017 Local Plan, with the regulation 18 stage of consultation having finalised on the 29<sup>th</sup> September 2023. It is the City Council's aim to meet its own needs within its own boundaries, however at this stage of the plan review process this cannot be confirmed as deliverable, pending detailed assessment of capacity.
- 1.5 Coventry has been identified by national government as one of the cities subject to 'urban uplift', resulting in an imposed additional housing requirement of 35%. Through the City Councils plan review process, the authority proposes to challenge this uplift at examination and cannot at this point conclude the level of housing delivery which will be required in the forthcoming plan period.
- 1.6 As such the City Council proposes in its response to Nuneaton and Bedworth's regulation 19 Borough Plan consultation that flexibility should be retained within the Borough Plan, given that other plans within the HMA are currently at an earlier stage, whilst noting that this point is also recognised in the Sustainability Appraisal presented alongside the draft Borough Plan.
- 1.7 Suggestions around how such flexibility may be retained within the Borough Plan to ensure the needs of the HMA are met are contained within Appendix One

## **2. Options considered and recommended proposal**

- 2.1. The Cabinet Member could choose to not support the submission of the representation to the NBBC Borough Plan, however this would limit the ability for representation on current and future matters of neighbouring allocations.
- 2.2. The recommendation is to support the submission of the representation, in order that flexibility of allocation be recommended to NBBC for the reasons outlined in appendix one.

## **3. Timetable for implementing this decision**

- 3.1. The decision will be implemented immediately, with the representation submission being made to meet the consultation deadline of 16<sup>th</sup> October 2023

## **4. Comments from the Chief Finance Officer (Section 151 Officer) and Chief Legal Officer**

### **4.1. Financial implications**

There are no financial implications associated with this report

### **4.2. Legal implications**

There are no legal implications associated with this report.

## **5. Other implications**

### **5.1. How will this contribute to the Council Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan/))**

The representation aligns to the identified delivery priorities of the Council Plan in Improving outcomes and tackling inequalities within our communities and Improving the economic prosperity of the city and regions

### **5.2. How is risk being managed?**

There is no risk associated with the recommendations.

### **5.3. What is the impact on the organisation?**

Should the representation be endorsed, the planning policy team will submit the representation within existing resource.

### **5.4. Equality/ EIA**

A full Equality and Impact Assessment (ECA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010).

### **5.5. Implications for (or impact on) climate change and the environment**

There is no direct impact from the recommendations of the report.

### **5.6. Implications for partner organisations?**

None

**Report author:****Name and job title:**

Chris Styles

Head Planning Policy and Environment

**Service**

Planning Policy and Environment – Planning &amp; Regulation

**Tel and email contact:**

Tel: 02476 978179

Email: Chris.Styles@coventry.gov.uk

Enquiries should be directed to the above persons.

<b>Contributor/approver name</b>	<b>Title</b>	<b>Service Area</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Usha Patel	Governance Services Officer	Law and Governance	05.10.2023	05.10.2023
Rob Back	Strategic Lead Planning	Streetscene and Regulatory Services	05.10.2023	05.10.2023
<b>Names of approvers for submission:</b> (officers and members)				
Cath Crosby	Lead Accountant, Business Partnering, Place	Finance	05.10.2023	05.10.2023
Oluremi Aremu	Head of Legal and Procurement Services	Law and Governance	05.10.2023	05.10.2023

Andrew Walster	Director of Streetscene and Regulatory Services	-	05.10.2023	5.10.2023
Councillor D Welsh	Cabinet Member for Housing and Communities	-	05.10.2023	5.10.2023

This report is published on the council's website:  
[www.coventry.gov.uk/councilmeetings](http://www.coventry.gov.uk/councilmeetings)



## **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	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

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

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

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 29<sup>th</sup> 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.

Finally, 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.

--

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.

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.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent 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 <b>Yes if needed</b>	x

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

This will depend upon the nature of the discussions which evolved under the Duty to Co-operate.

--

**Please note** the Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the oral part of the examination.

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:	

**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	DS4 Residential allocations
Policies	
Map	

4. Do you consider the Borough Plan is:

4.(1) Legally compliant?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

4.(2) Sound?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

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

Yes	x
No	<input type="checkbox"/>

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.

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

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 29<sup>th</sup> 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 Council's 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 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 for allocation 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 – is 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.

Finally, 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.

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.

Whilst it is for Nuneaton and Bedworth Council to determine exactly which sites it wishes to include for allocation 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 – is required.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent 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?

<b>No</b> , I do not wish to participate at the oral examination	
<b>Yes</b> , I wish to participate at the oral examination <b>Yes if needed</b>	x



8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

This will depend upon the nature of the discussions which evolved under the Duty to Co-operate.

**Please note** the Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the oral part of the examination.

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:

This page is intentionally left blank