

Nuneaton and Bedworth Borough Council Borough Plan review

Issues and Options consultation response

In broad terms Coventry City Council considers that the majority of the matters considered in the Issues and Options consultation relate to local choices to be made by NBBC based on up to date evidence and detailed site appraisal and therefore it would not be appropriate to comment in detail at this stage. Similarly, there are more strategic choices which will need to be made as a result of ongoing work with partners to update the evidence base, for example the updated Housing and Economic Development Needs Assessment (HEDNA) which has recently been jointly commissioned by Nuneaton, Coventry, Rugby, Warwick, Stratford and North Warwickshire councils. Further discussions on dealing with strategic matters are underway in terms of advancing a variety of workstreams across the wider sub-region through the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO). The outcomes of this research will enable NBBC to make informed choices as work on the plan review progresses.

Memorandum of Understanding (MoU)

In order to be able to demonstrate compliance with the statutory Duty to Cooperate and thus achieve sound plans it was essential that each Council signed two Memorandums of Understanding committing to delivering the unmet housing and employment needs of Coventry City Council. This was duly undertaken at the appropriate stage for each local authority and demonstrated the solid partnership working and positive co-operation between the parties involved.

Coventry City Council is therefore extremely disappointed to see in paragraph 7.8 of the Issues and Options document that NBBC will be '*withdrawing from the current memorandum of understanding (MoU) and will seek to negotiate an appropriate arrangement with sub-regional partners*'.

Paragraphs 7.6 and 7.7 reference the 'Planning for the Future' White Paper and its intention to abolish the Duty to Cooperate. There is no certainty as to what outcomes will result from the White Paper in the proposed Planning Bill, if any. Recent difficulties regarding planning reform, including the MCHLG Committee paper on the Paper, show the complexities of the matter and the political uncertainties in bringing anything forward. We are still some time away from knowing the proposed content of a Planning Bill, let alone it being passed into statute.

Similarly, the recent independent review of Office for National Statistics population estimates and projections is cited. At the time of consultation there is no indication of the scale or root of the issue, with the ONS yet to respond to the review. Furthermore, as reiterated in both the independent review and in the Issues and Options consultation, the government proscribes the use of the 2014 population projections as part of the Standard Methodology. As such, without there being a change in government policy, any amendment to future ONS methodology would not have an impact on the overall Housing Needs of individual authorities in the HMA.

Given the withdrawal from the MoU is based on the above two factors, the outcomes of which are entirely unknown, such action is considered premature and without a basis in evidence.

Coventry City Council urges NBBC to reconsider its position with regard to the MoU so as not to undermine the strong partnership approaches which have been established, and to continue to constructively engage in dialogue to address any issues, using an informed, evidenced approach.

Other Matters

In terms of the proposed plan period (2021 – 2038), Coventry City Council would comment that the NPPF requires a minimum plan period of 15 years from adoption. This plan period gives little room for flexibility. The HEDNA is focusing upon a period up to 2043 so it would seem pragmatic to align with this instead.

It is noted that paragraph 7.11 of the Issues and Options document cites the latest standard method figure which at 429 dwellings per annum would equate to 6,435 dwellings over the proposed 15 years plan period. The paragraph states that this would form the basis of the housing component of the HEDNA. Whilst this is true, this figure would be a minimum and this position would not negate any ongoing discussions over unmet need arising from other authorities and the Duty to Co-operate would still need to be complied with.

In terms of the Sustainability Appraisal which accompanies the Issues and Options report, this will need to have regard to the wider context within which Nuneaton and Bedworth sits including the findings of any updated evidence with regard to the HEDNA and any cross boundary considerations which might arise from this work.