

WARWICK LOCAL PLAN EXAMINATION

MATTER 2 – OVERALL PROVISION FOR HOUSING

HEARING STATEMENT ON BEHALF OF LIONCOURT STRATEGIC LAND – AUGUST 2016

RESPONDENT REFERENCE NUMBER - 11870

Introduction

1. This statement should be read in conjunction with the representations dated 22 April 2016 submitted by Savills on behalf of Lioncourt Strategic Land (referred to hereafter as 'LSL') to the Warwick District Local Plan proposed modifications consultation.
2. Responses are made to the Inspector's questions, as issued by the Programme Officer on 15 July 2016. Responses are provided only to those questions relevant to LSL's representations. Responses are set out in the order questions are raised.

Q10 - How will unmet needs from Coventry be met? What is the basis for calculating the distribution of unmet needs to other authorities and is this justified?

3. Following discussions falling under the Duty to Cooperate it is recognised through a Memorandum of Understanding (MoU) and the evidence base that Coventry will not be able to accommodate the whole of its new housing requirements for 2011-31 within its administrative boundary and that some provision is being made in adjoining areas to help meet Coventry's needs
4. The MoU relating to the planning distribution of housing (September 2015) (HO21PM) seeks to ensure the housing needs of the Coventry and Warwickshire Housing Market Area (HMA) are planned for in full during the current round of Local Plans. Table 2 of the MOU proposes the redistribution of 18,640 dwellings to Warwick District. Clause 6 of the MoU requires each LPA to prepare a plan in accordance with the redistributed housing figures.
5. The MOU was supported by all Members of the Coventry and Warwickshire Shadow Economic Prosperity Board except representatives of Nuneaton and Bedworth Borough Council (NBBC). NBBC has subsequently agreed to undertake further work to test the unmet need from Coventry and has committed to undertaking further consultation on its Borough Plan in January 2017. The agreed statement between

Coventry City Council and NBBC (submitted to the Coventry Local Plan Examination) provides a clear indications that NBBC is willing to assist Coventry in meeting its housing shortfall.

6. Warwick District Council's Sustainability Appraisal Addendum Report February 2016 (SA11PM) provides an assessment of the proposals to take on board additional housing requirements from Coventry and the reasonable alternatives that were considered for delivering Coventry's shortfall, including land south (edge) of Coventry (Kings Hill). Warwick District Council has subsequently revised its plan to include additional land for housing, including Kings Hill, to assist Coventry in meeting its housing shortfall. This is supported by LSL.

Q11 - Does the Memorandum of Understanding (MOU) between authorities effectively deal with this issue? What does this commit authorities to and is this sufficient? How does this relate to existing and emerging plans?

1. The NPPF¹ requires local planning authorities to *"use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area..."*.
2. Given that Coventry is reliant on neighbouring authorities to assist in delivering its housing target, there should be a universal requirement for Coventry and the Warwickshire Authorities (including Warwick District Council) to have a review mechanism in their respective plan documents to ensure that they work collaboratively to secure the development of further homes to contribute towards meeting Coventry's housing requirement.

Q12 - What is the position with Nuneaton and Bedworth Borough Council and the MOU? How does this affect the situation? What are the implications for other authorities?

3. NBBC were unable to sign the MOU due to concerns around their capacity and their ability to plan for the additional homes identified as a result of their functional relationship with Coventry City.
4. An agreed statement between Coventry City Council and Nuneaton and Bedworth Borough Council (NBBC) was submitted to the Coventry Local Plan Examination in July 2016. This confirms that NBBC are committed to undertaking a period of consultation on their emerging Local Plan in January 2017 to test the unmet need from Coventry. Should it not be possible for Coventry's additional housing requirement to be

¹ Paragraph 47 - NPPF

met within its boundaries NBBC has agreed to work jointly with their Warwickshire neighbours to review the Memorandum of Understanding as appropriate. Therefore the review mechanism in the WDC Local Plan is essential.

5. In the event that NBBC is unable to meet the identified requirement for Coventry's need there would be a requirement for other authorities to re-visit the proportion of dwellings distributed to them. Given Warwick's close functional relationship with Coventry it would be expected that the District would need to assess the ability to take on a larger proportion of the city's need. This would necessarily require a review of the District Local Plan. The adoption of the following wording (or similar) is suggested:

Warwick District Council will seek to work collaboratively with neighbouring authorities to secure the development of further homes to contribute toward meeting the housing requirement for Coventry over the period to 2031.

Following discussions falling under the Duty to Cooperate it is recognised through a Memorandum of Understanding (MoU) and the evidence base that Coventry will not be able to accommodate the whole of its new housing requirements for 2011-31 within its administrative boundary and that some provision is being made in adjoining areas to help meet Coventry's needs. In the event that the strategy set out in the MoU and in the Coventry Plan is at risk of not being met and further housing provision is needed in Coventry, then an early review or partial review of the Warwick District Local Plan will be undertaken.

6. A review mechanism should be put in place to deal with the situation where NBBC cannot support the remaining shortfall. This will provide the certainty for the Inspector to adopt the plan on the basis of the housing distribution proposed in the MoU.
7. The emerging NBBC Borough Plan makes provision to deliver 10,040 dwellings within the authority in the plan period up to 2031. In addition to this NBBC is required to accommodate a further 4,020 dwellings of Coventry City Council's housing shortfall.

Q13 - What effect does the situation in Birmingham have i.e. in terms of unmet need, the relationship to Coventry and Warwickshire authorities and the Birmingham Development Plan?

Has this been taken into account?

8. It should be noted that the MoU deals directly with the housing needs arising from within the Coventry and Warwickshire HMA. It does not address any shortfall arising within the Greater Birmingham HMA. Although work to assess the shortfall from the Greater Birmingham HMA is progressing, at this point in time it is not clear to what extent any unmet need will have to be met within Coventry and Warwickshire so it is not possible for Warwick to take on board any unmet need in Birmingham at this stage. A review mechanism could address this should Birmingham's should fall need to be met in part by Warwick District.