

Statement of Common Ground – Regarding the Coventry City Council Proposed Local Plan Modifications.

1. The following statement is agreed by Coventry City Council (CCC) and Nuneaton and Bedworth Borough Council (NBBC).
2. It is provided in response to a range of consultation responses received to the CCC Local Plan Proposed Modifications and is intended to provide the relevant Inspector with the most up to date position. This is with a view to supporting the continued examination of the CCC Local Plan to a successful conclusion.
3. Consultation on the proposed modifications to the CCC Local Plan finished on the 28th April 2017. NBBC made no further response to this consultation.
4. That together with the other Warwickshire authorities (namely Rugby Borough Council, North Warwickshire Borough Council, Warwick District Council and Stratford on Avon District Council), CCC and NBBC form the Coventry and Warwickshire Housing Market Area (CWHMA).
5. NBBC were signatories to the Employment Land MOU (agreed in July 2016) but were not signatories to the Housing Requirements MOU which was signed by the other 5 HMA authorities in September 2015. This position currently remains unchanged.
6. NBBC did not sign the Housing Requirements MoU only because at the time the available evidence suggested a significant shortfall of land available to accommodate its objectively assessed housing need as defined in the MoU, and did not want to give an impression that the shortfall could be easily resolved. NBBC did however agree to update its SHLAA using the agreed Coventry and Warwickshire shared methodology. This work was completed prior to the publication of the NBBC Borough Plan in January 2017. This concluded that there remains a shortfall in its ability to accommodate the level of housing identified for NBBC within the MOU.
7. NBBC did sign the Employment MoU, however this MOU does contain a caveat linked to further site assessment work which reflected the Boroughs position of Plan development at that time. Subsequent work in developing the Borough Plan has shown a small shortfall in employment land supply relative to the figure identified for NBBC within the MOU.
8. Consultation on the Publication draft of the NBBC Borough Plan finished on 13th March 2017. Alongside its other Warwickshire neighbours, CCC submitted both an independent and a joint response to the Borough Plan. This reflected matters of soundness and duty to cooperate.
9. That the primary focus of the objection was that the growth proposals contained within the Borough Plan did not meet the figures recommended in the Coventry and Warwickshire Housing Requirements MOU, or the Employment Land MOU and that such shortfall had not

been reasonably shared in advance of the Plans publication. In this context, the other authorities felt reasonable opportunities remained available to rectify that position.

10. That since the objections were submitted, NBBC have taken a strong lead in on-going discussions with all HMA authorities with a view to overcoming said objections.
11. That this has been with a view to maintaining the current Borough Plan timetable. This would see the Borough Plan and the responses to it considered at full Council (for NBBC) on the 24th May 2017 with the intention of subsequently submitting the Plan to the Secretary of State in early June.
12. That work on overcoming the objections from Coventry City Council and its other Warwickshire neighbours will remain on-going with a view to producing an agreed schedule of proposed amendments to the Plan to reflect any additional capacity that may be identified within the Borough. This is expected to be presented as part of the examination papers to the NBBC plan, although the exact timing is yet to be confirmed.
13. This may include a subsequent signing of the HMA Housing Requirements MOU.
14. CCC remains committed to working with other authorities in the HMA to review the housing and/or employment MoUs if, after exploring all other reasonable avenues in co-operation with other HMA authorities, NBBC is still unable to meet its housing and/or employment allocations. This position reflects the review aspect of the MOU's and also the proposed review mechanism inserted into the CCC Local Plan (Policy DS1) at the modifications stage.
15. That both CCC and NBBC are working as part of the joint Coventry and Warwickshire Monitoring group to complete an updated monitoring report for the sub-region. This will contain data on completions and supply of housing and employment land and will monitor the MOU agreements.
16. That at this time there remains a good level of land supply across the HMA that is sufficient to meet the identified HMA need for both housing and employment provisions. However, due to the minimum nature of the identified need and the importance of flexibility within land supply, this position is expected to improve as part of the on-going work on the Borough Plan and, if necessary, through future reviews of the MoUs (as suggested above).