

Coventry City Council Local Plan Review (2021 - 2041)



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

August 2025

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Organisations

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

Introduction

This Statement of Common Ground identifies areas of agreement and disagreement between CCC and NBBC in relation to the Local Plan Review (2021-2041) and supporting evidence base. This Statement has been prepared to assist the Examination of the Plan and covers the administrative area of CCC.

Coventry is the ninth largest city in England and the twelfth largest in the UK. The administrative area covered by the City Council is primarily urban in nature, with a small area of Green Belt mainly in the north west. The area is physically bounded by Nuneaton and Bedworth and North Warwickshire to the north, Rugby to the east, Warwick to the South and Solihull to the west.

Under the Duty to Co-operate the Council works with a wide range of Local Authority partners on a range of strategic social, economic and environmental issues, primarily via the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO). These include Stratford on Avon District Council which is working with Warwick District Council on the joint South Warwickshire Local Plan, Rugby Borough Council, North Warwickshire Borough Council, NBBC, Solihull Metropolitan Borough Council, and Warwickshire County Council as the upper tier authority for the Warwickshire Districts and Boroughs.

The Housing Market Area (HMA) and the Functional Economic Market Area (FEMA) consists of the administrative areas of CCC, Stratford on Avon District Council, Warwick District Council, Rugby Borough Council, North Warwickshire Borough Council, NBBC and Warwickshire County Council (upper tier authority for the Warwickshire Districts and Boroughs).

CCC is also a constituent member of the West Midlands Combined Authority (WMCA), along with Solihull Metropolitan Borough Council, Birmingham City Council, Walsall Council, Sandwell Council, Dudley Council and the City of Wolverhampton Council.

The map at **Appendix A** shows the geographical relationship between the different authorities.

CCC has fully engaged with NBBC 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, NBBC has been formally consulted at every stage of consultation on the Plan Review together with its accompanying Sustainability Appraisal and the Habitat Regulations Assessment. NBBC made representations to the Regulation 19 stage of the Review and in addition provided a formal response (dated 27th February 2025) to CCC's request for assistance in meeting the employment shortfall (**Appendix B**). 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.

This SoCG should be read in conjunction with the Memorandum of Understanding (Appendix C) which provides overarching context, with the purpose of the SoCG to provide more detailed articulation of more localised matters.

Strategic matters

The key strategic matters being addressed by this SoCG relate to the quantum of appropriate levels of housing and employment growth, and how it should be accommodated across the Housing Market Area (HMA) and the Functional Economic Market Area (FEMA).

Areas of Agreement

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

Housing Requirements

The position regarding Coventry's housing requirement is set out in the MoU which NBBC has signed.

Employment requirements

The position regarding Coventry's employment need and supply is set out in the MoU which NBBC has signed.

It is agreed that at this current time the West Midlands Strategic Employment Site Study (WMSESS) is the prime evidence document regarding strategic employment land need in the West Midlands region. The Alignment Paper brings together the WMSESS and the Coventry and Warwickshire Housing and Economic Development Needs Assessment (C&W HEDNA) 2022 to align the studies over a consistent set of timescales. The Alignment Paper provides the most up to date joint evidence regarding the level of employment need for each of the FEMA authorities, including local need and strategic need.

It is agreed that the alignment paper identifies a local employment need of 105 hectares for Coventry, a supply of 60 hectares and a residual need of 45 hectares.

In terms of establishing the extent of Coventry's shortfall, this was an area identified under Section 5 of the MoU 'points yet to be resolved'.

It is agreed that CCC has undertaken work in identifying and protecting employment sites, including five call-for-sites (one specifically focused on employment and three specifically focused on brownfield only sites), a new Employment Land Review which includes identifying key employment sites and a new Office Market addendum to the Employment Land Review.

In response to issues raised through the Regulation 19 representations by NBBC, further work (dated July 2025 and updated August 2025 following further feedback from NBBC) has been undertaken identifying potential for recycling employment sites, the latter yielding a potential for circa 19.5 hectares of further local supply therefore reducing the shortfall to circa 25.5 hectares.

In terms of local need, it is agreed that at the time of NBBC's local plan review examination, for which hearings took place in July – October 2024, it was not possible to establish details regarding the local employment need shortfall, as details were not available at that point in time.

In terms of strategic need it is agreed that NBBC sits within a different Opportunity Area to Coventry as defined in the West Midlands Strategic Employment Sites Study (WMSESS) and the Coventry and Warwickshire Alignment Paper. Notwithstanding this, it is agreed that Coventry has no new sites identified of a sufficient scale which could contribute to meeting the growth identified in the Alignment Paper for Opportunity Area 7 which relates primarily to Coventry and Rugby. However, the two authorities agree to continue to work constructively together under the Duty to Co-operate with partners in the wider sub region to address both strategic and local need including through the process of further local plan preparation and review.

Areas of Disagreement

NBBC

NBBC made representations to CCC's Regulation 19 Policy JE2 (Appendix D) regarding the site assessment process for employment sites, contending that in the context of an employment shortfall, the approach to Green Belt is a constraint to overcome. Specific reference is made to the 11.81 ha omission site 'Land North of A45 and West of Brickhill Lane', stating that the impact of the new road infrastructure to the south of the proposed site (to serve adopted Local Plan allocation H2:2 Eastern Green SUE) has not been taken into account either in terms of the impact upon the openness of Green Belt in that location nor in relation to the potential benefits to the economy from a site in that location.

CCC

CCC contends that the potential benefits to the economy were considered through the Sustainability Appraisal where it was assessed that there were positive uncertain effects in general terms from Green Belt release for employment use (SA P.53 Table 4.6a), and also in table 4.7a (P58) where Option 3 of the strategic options for accommodating employment land (the identified supply of 60 hectares plus the 11.81 hectare site in the Green Belt) was found to have major positive effects for economic growth.

In terms of the point made regarding the Green Belt Technical Update Study, at the time this work was undertaken the road infrastructure works were not complete and the study represents the position at that time. Notwithstanding this, the assessed

area (Area 1) was assessed as making a significant contribution to Green Belt purposes as set out in the NPPF 2023 (page 26 of the Technical Update Study).

The Sustainability Appraisal considers that development of the limited Green Belt in the Coventry area could cause major negative effects to the townscape and landscape (para 4.114), and this is also reflected in table 4.7a Option 3 (60ha supply plus the Green Belt employment site) which shows harm to townscapes and landscapes.

In terms of the employment site itself the SA assesses this in detail in Appendix 5 to the SA. This includes double positive effects for economic growth, positive effects for health and for sustainable travel patterns, possible positive effects for communities and accessible services, nature and biodiversity enhancement, minor negative effects for natural resources (soil / agricultural land) major negative effects on townscapes and landscapes, and neutral on all other assessment criteria.

SA para.5.6 summarises that ‘The one new site option being promoted for employment land was tested through SA and found to have major negative effects for development in the Green Belt; also, found to have minor negative effects for loss of Grade 3 agricultural land and the soil resource. Therefore, this site option was not taken forward because of negative effects on soils, agricultural land, and major negative effects on Green Belt purposes. This is especially with regard to avoiding urban sprawl and coalescence at the western edge of the urban area that has been shown to be very sensitive.’

CCC therefore contends that it has undertaken thorough and considered assessment and rejected the site for the reasons set out above when considered in the balance.

This remains an issue of disagreement between the parties.

Further joint working


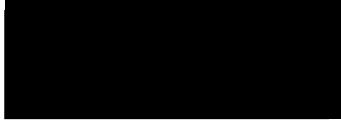
This Statement of Common Ground will be kept up to date through continuous engagement and cooperation between CCC and NBBC. Joint working will continue to take place through the CSWAPO group, and the Duty to Co-operate sub group which is focused upon the HMA and FEMA area.

Monitoring

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

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

Signatories

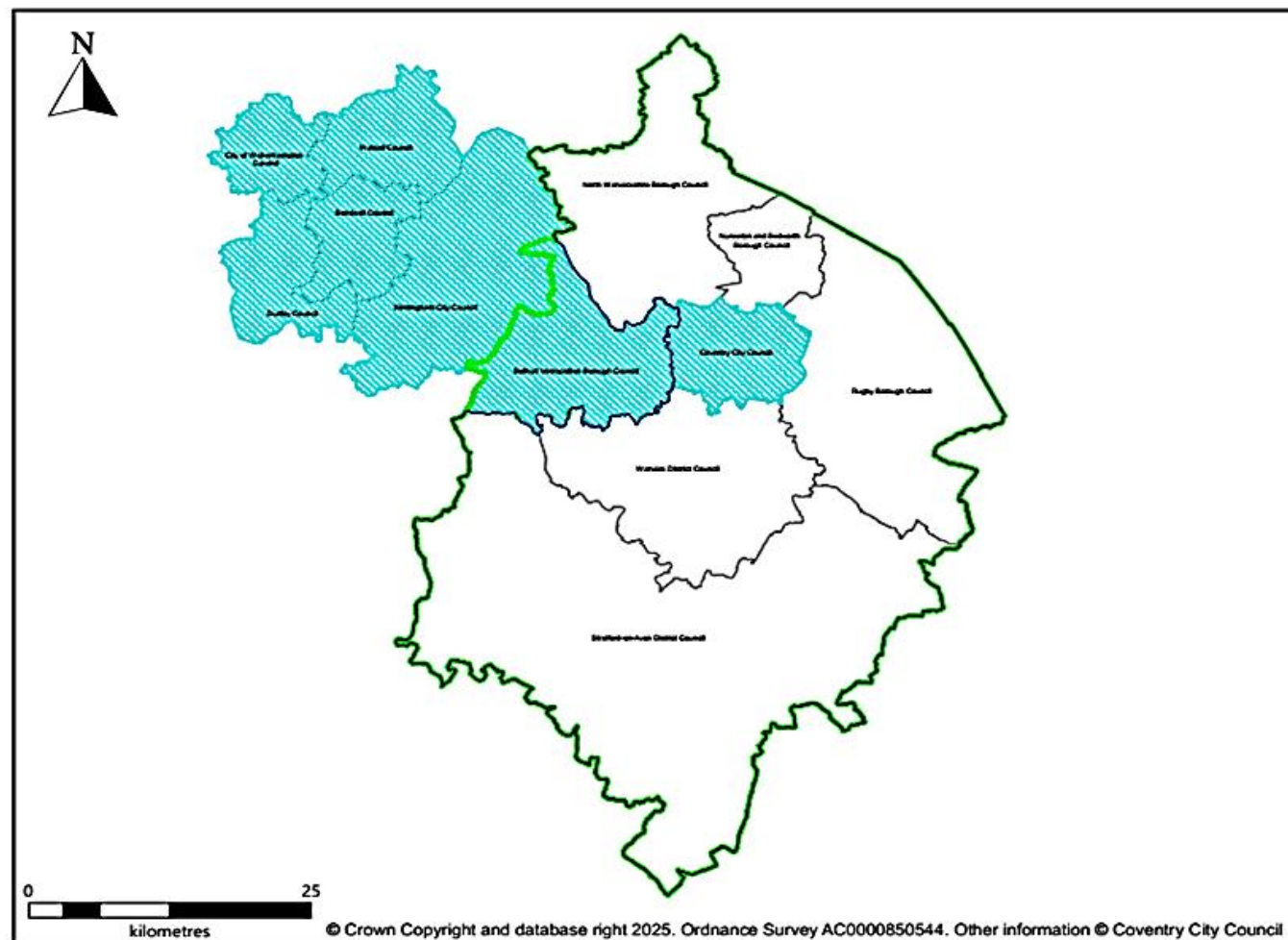
Signature: 	Signature:
Tony Venson – Portfolio Holder for Planning and Enforcement	
Date: 04.09.25	Date:
Signature: 	08/09/2025
Councillor Naeem Akhtar Cabinet Member for Housing & Communities Coventry City Council	

Appendix A – Duty to Co-operate map

Coventry City Council Duty to Co-operate Map

Legend

-  CSWAPO
 HMA and FEMA
 WMCA
 Authority Boundaries



Appendix B – CCC letter and NBBC response to request for assistance with the employment shortfall



FAO Maria Bailey
Strategic Director – Housing and Community
Nuneaton and Bedworth Borough Council

City Services

Postal Address
Coventry City Council
PO Box 7097
COVENTRY
CV6 9SL

coventry.gov.uk

Email: Rob.Back@coventry.gov.uk

Our reference : DtCEmp

Date: 13 February 2025

re: Coventry Local Plan Review and Employment Land shortfall

Dear Maria

Coventry City Council is currently consulting on the Regulation 19 stage of the Local Plan review. As you will be aware, under the Statutory Duty to Co-operate, officers have been working together on a shared evidence base to inform plan making.

We are pleased to be able to advise that, for this round of plan-making we believe we can accommodate our housing growth needs, as can be seen from the documentation we have published. However, the evidence base for employment provides a Local Employment Need figure of 105 hectares for Coventry, and we are only able to identify a supply of 60 hectares, therefore leaving a shortfall of 45 hectares.

The City Council has undertaken several Call for Sites exercises in seeking to address this shortfall, including a targeted Call for Employment Sites in summer 2024. Additionally, as part of the Local Plan Review process, we have also carried out an Employment Land review and have developed policies aimed at protecting our existing employment sites.

However, through these processes the authority has only received one new submission, this being of an 11 hectare proposal to the east of Coventry which, further to assessment, has been discounted as the nominated site lies within a significant area of Green Belt, within the historic Arden landscape, and is also high-quality agricultural land.

In terms of strategic employment sites (those of 25 hectares and over) we also wish you to be aware that similarly we have received no new sites which being promoted for this purpose within our administrative area.

The situation has been discussed at officer level through our regular Duty to Co-operate meetings, in the context of our formal launch of the Regulation 19 stage of plan making, the City Council is now formally requesting the assistance of neighbouring authorities in meeting this need, as partner authorities within the defined Functional Economic Market Area (FEMA), through the development of your own Local Plans

CS-WHOLE-WHOLESTART

We would be grateful for your consideration of this matter and look forward to your response. We would appreciate feedback within a month of the date of this letter and of course would welcome further discussion.

Yours sincerely,



Rob Back
Strategic Lead: Planning
Coventry City Council

Enquiries to: Louise Hryniw

Direct Dial: (024) 7637 6310

Direct Email: louise.hryniw@nuneatonandbedworth.gov.uk

Date: 27.02.2025

Your Ref: DtCEmp

Coventry City Council
PO Box 7097
Coventry
BCV6 9SL

FAO: Rob Back, Strategic Lead: Planning

NBBC Response to Coventry Local Plan Review and Employment Land Shortfall

Thank you for your letter dated 13 February 2025. Nuneaton and Bedworth Borough Council (NBBC) has worked with Coventry City Council (CCC) on a range of cross boundary strategic matters in accordance with the Duty to Cooperate. CCC are currently consulting on the Regulation 19 Local Plan review which NBBC has recently submitted representations in response to.

We note and are supportive of the approach that CCC is able to meet its housing need within its administrative boundary. As you will be aware the NBBC Borough Plan Review (BPR) is at an advanced stage of preparation, with the Regulation 19 Examination in Public hearings undertaken in July to October 2024. The NBBC BPR establishes a housing requirement above the minimum need to provide for economic growth, regeneration of the town centres, and headroom for unmet need within the HMA. NBBC will continue to work with CCC on this matter as respective Local Plans progress.

It is understood that the CCC Local Plan results in a shortfall of 45 ha employment land against a need of 105 ha. NBBC has recently undertaken a 'Call for Employment Sites' exercise, with the results about to be published. Of the sites submitted two non-Green Belt sites were received both of which pose potential deliverability issues. The remainder were located in the Green Belt. Therefore, the NBBC Call for Sites exercise establishes that there is no suitable employment land in the Borough which matches the CCC preferred approach to allocate non-Green Belt sites.

NBBC believes the shortfall occurs, in part, due to CCC preferred approach to protect Green Belt sites and promote brownfield sites. As set out in our Regulation 19 representations, there are steps CCC could take to ensure the shortfall is met within the administrative boundaries.

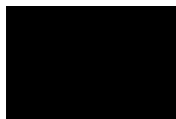
The 11 ha site mentioned in your letter has been discarded as it located in the Green Belt and agricultural land classification. NBBC notes that a significant highway infrastructure project has been permissioned and built within the site boundary project which allows access from the A45. We consider there should be an assessment regarding the openness of the Green Belt in this area to establish if the Green Belt has been comprised by the development. There are also economic and sustainability benefits to allocating land in proximity to the strategic highway network which should also be considered. NBBC notes that the Agricultural Classification for the site is the same as for the traffic island and nearby Sustainable Urban Extension.

We are supportive of the approach to promote brownfield sites but believe CCC has excluded a provision from recycling of sites. As outlined in our representation, the HEDNA is based on gross completions and assumes some of the need is generated in this way. It is logical that some of the supply will be met in the same way over the plan period.

We consider that investigating these issues will go some way towards CCC being able to meet more of its need within its administrative boundaries.

We look forward to continuing to work with you as we both progress our Local Plans.

Yours sincerely



Louise Hryniw
Assistant Director – Planning

Appendix C - MoU (as signed by NBBC)

INTRODUCTION

This Memorandum of Understanding (MoU) has been prepared in accordance with national guidance¹ and is intended to cover matters of strategic importance relevant to all authorities, specifically relating to housing and employment needs across the Housing Market Area (HMA) and Functional Economic Market Area (FEMA).

The intention is that once discussed and supported, through amendments if required, this MoU will be agreed by the following Councils:

Coventry City Council
North Warwickshire Borough Council
Nuneaton & Bedworth Borough Council
Rugby Borough Council
Stratford-on-Avon District Council
Warwick District Council
Warwickshire County Council

GEOGRAPHY COVERED BY MEMORANDUM OF UNDERSTANDING

This MoU covers the Local Planning Authorities within the Coventry and Warwickshire HMA/FEMA (C&W HMA). The C&W HMA/FEMA is made up of Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council, Warwick District Council and Warwickshire County Council. It is also acknowledged that North Warwickshire Borough Council and Stratford-on-Avon District Council are also part of the Greater Birmingham HMA.

PURPOSE

There is a legal requirement for effective cooperation relating to strategic matters that cross administrative boundaries to be dealt with and evidenced by Statements of Common Ground.

This Memorandum of Understanding seeks to ensure that as the Local Planning Authorities develop their Local Plans, at differing paces, the housing and employment needs of the C&W HMA/FEMA are met. It is framed within the duty to cooperate set out in Section 33A of the Planning and Compulsory Purchase Act 2004 and in the context of the National Planning Policy Framework (2023 & 2024). This sets out the duty for local planning authorities and county councils to co-operate in maximising the effectiveness of the preparation of development plan documents so far as relating to strategic matters which affect more than one local authority area. As many of the local planning authorities in the Coventry and Warwickshire area are only in the early stages of reviewing their adopted plans (and acknowledging that not all have commenced such reviews, nor are required to at this stage), the situation is evolving in identifying levels of supply for housing and employment needs within authority boundaries. Through capacity assessment and a strategy of promoting best use of

¹ Planning Practice Guidance Paragraph 011 Reference ID: 61-011-20190315

development land it is understood that Coventry anticipates being able to meet its own local housing needs as identified in the HEDNA – Table 1.

The Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (November 2024) establishes that Coventry has 105 Ha of local employment need to 2041, a supply of 60ha and a residual need of 45Ha (Table 3). In regard to strategic need, Appendix 1 of the Alignment Report sets out details of committed sites across the FEMA. Discussions with partners as to how to address residual local and strategic employment needs across the FEMA are underway, therefore the MoU is iterative and will be updated as discussions progress.

This Memorandum of Understanding commits Coventry City Council and the five Borough/District Councils within Warwickshire to an ongoing collaborative process to address the housing and economic development needs of the market area and to maintain realistic assumptions about the availability, suitability and viability of land to meet that need. In addition, given the importance of Warwickshire County Council's role and responsibilities within the area they are a signatory to this MoU.

POINTS OF AGREEMENT

It is agreed that for plan making purposes there is a housing market area and functional economic market area comprising Coventry and the whole of Warwickshire. In addition, North Warwickshire Borough Council and Stratford-on-Avon District Council fall within the Greater Birmingham and Black Country Housing Market Area and therefore have a functional relationship with that area.

The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA), produced by independent consultants ICENI Projects on behalf of the Coventry and Warwickshire local authorities, sets out an objective assessment of housing need and employment need for the Coventry and Warwickshire area. The figures below are taken directly from the HEDNA and do not include the 35% 'cities uplift' for Coventry (see para.4.6.3)

Table 1: Local Housing Need (dwellings per annum) Trend-based - HEDNA

Authority	HEDNA Housing Need (dpa)
Coventry	1455
North Warwickshire	119
Nuneaton and Bedworth ²	409
Rugby	735
Stratford-on-Avon	868
Warwick	811
Total	4397

Source: Table 5.33 HEDNA 2022

² Nuneaton and Bedworth Borough Council commissioned a bespoke report 'Towards a Housing Requirement for Nuneaton' to be read alongside the HEDNA which provides more specific consideration of housing and employment need in Nuneaton and Bedworth Borough taking into account relevant local considerations. This identifies a housing requirement of 545 dwellings per annum for Nuneaton and Bedworth Borough.

It is agreed that the 2022 HEDNA, utilising 2021 Census Data, forms the most robust evidence base of establishing the housing and employment needs of the HMA/FEMA for plans being prepared by Coventry City Council and Nuneaton and Bedworth Borough Council, under the December 2023 NPPF.

It is agreed that for plans being prepared under the December 2024 NPPF, the HEDNA Housing Needs are superseded by the December 2024 NPPF Standard Method outcomes of Local Housing Need, as shown in Table 2 below.

Table 2: December 2024 National Planning Policy Framework - Local Housing Need

Authority	2024 NPPF Indicative Local Housing Need (dpa)
Coventry	1388
North Warwickshire	364
Nuneaton and Bedworth ³	737
Rugby	618
Stratford-on-Avon	1126
Warwick	1062
Total	5295

Source: NPPF Standard Method December 2024

It is agreed that the West Midlands Strategic Employment Sites Study (WMSESS) 2023/2024 further informs the strategic employment needs of the HMA/FEMA, and that the Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (2024) accurately updates the HEDNA employment evidence and presents the current levels of employment need and supply across the HMA/FEMA.

Table 3: Local Industrial Residual Need 2021-41 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	58	5	53
North Warwickshire	60	34	26
Nuneaton and Bedworth ⁴	41	52 ⁵	-11
Coventry	105	60	45

³ See Footnote 2 regarding the figure for NBBC.

⁴ Nuneaton and Bedworth Borough Council commissioned a bespoke report 'Towards a Housing Requirement for Nuneaton' and to be read alongside the HEDNA and 'Review of Nuneaton & Bedworth Employment Land Portfolio'. These documents identify a local industrial and warehouse employment need figure for Nuneaton and Bedworth of 66.45 ha.

⁵ Figure only includes allocated sites.

Stratford	144	56	88
Warwick	83	37	46
Total	492	244	248

NB: figures may not sum due to rounding

Table 4: Local Industrial Residual Need 2021-45 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	68	5	63
North Warwickshire	70	34	36
Nuneaton and Bedworth	48	52	-4
Coventry	122	60	62
Stratford	167	56	111
Warwick	97	37	60
Total	572	244	328

Table 5: Local Industrial Residual Need 2021-50 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	80	5	75
North Warwickshire	82	34	48
Nuneaton and Bedworth	56	52	4
Coventry	143	60	83
Stratford	196	56	140
Warwick	113	37	76
Total	670	244	426

4.6 Each Council will cooperate in the delivery of the local housing and employment need which ensures that the overall needs across the housing market area will be met. To achieve this objective, it is agreed that:

4.6.1 At the time of signing this agreement it is considered that the HEDNA and WMSESS Alignment paper constitutes robust evidence for future plan-making for both housing and employment land for Coventry and Warwickshire (noting the provisions for calculating housing need as set out in paragraph 4.3 and 4.4).

4.6.2 The local authorities consider that the exceptional circumstances in Coventry and Warwickshire which are identified in the HEDNA⁶, justify a departure from the use of the Government's Standard Method for assessing local housing need, in line with paragraph 61 of the NPPF December 2023⁷.

4.6.3 It is agreed the 35% cities uplift applies specifically to the Government's Standard Method as referred to in the 2023 NPPF paragraph 62 and supporting Guidance and has been deleted in the 2024 NPPF revision. It relates only to specific cities and there is no requirement for this to be redistributed. It is agreed this figure was not evidenced by Government and did not reflect local need.

4.6.4 All parties will work together to address Strategic Employment Needs as shown in Table 6.

Table 6: Residual Strategic Site needs 2022-2045 – Iceni HEDNA - WMSESS Alignment Paper – November 2024

Opportunity area*	Residual Need
Area 5 – North Warwickshire	50 – 100ha
Area 7 – M6/A45/A46/M45 Coventry and Rugby	9 – 84ha
Area 8 – A46 / M40 Warwick	75 – 125ha

*As set out in the WMSESS these are broad areas they do not represent Local Authority administrative boundaries

4.6.5 The plan making process will ultimately establish the capacity of each area, and the quantities of housing and employment development that can be delivered.

4.6.6 Each local authority is committed to ongoing cooperation and engagement by both officers and members in relation to delivery of housing and employment land for the Coventry and Warwickshire area. Should any authority identify a shortfall, the Local Authorities will seek to work constructively together to explore how the needs of the HMA and/or FEMA may be accommodated within the appropriate geography.

4.6.7 This MOU will be reviewed as necessary in light of any changes to the National Planning Policy Framework (NPPF) and any new relevant new legislation.

4.6.8 All parties confirm the understanding that Coventry City Council is proceeding with progressing its plan under the current transitional arrangements and as such it is being prepared in line with the NPPF December 2023. Should this position change the MoU will be reviewed.

POINTS YET TO BE RESOLVED

Distribution of housing and employment: if any LPA within the area determines they are unable to deliver the amount of housing or employment as identified in the tables contained in this MoU then further discussions will be held and the MoU will be revised as appropriate.

⁶ See summary section 5, paragraph 5.159 to 5.161 of the HEDNA.

⁷ In line with the Transitional Arrangements under which the Coventry Local Plan is being reviewed.

Coventry City Council considers that it cannot meet its residual need of 45 hectares to 2041 and is requesting assistance from partners across the FEMA to help meet its Local Employment Need shortfall. However, the extent of this shortfall has not yet been agreed with partners and has been subject to challenge by other FEMA authorities. The detailed extent of agreement and disagreement will be set out in Statements of Common Ground with the relevant FEMA authorities.

Discussions regarding strategic employment need are underway across the FEMA in relation to the Opportunity Areas identified in the WMSESS but how this will be accommodated is yet to be resolved.

Rugby Borough Council has identified a need for 47 Gypsy and Traveller pitches beyond that which it can meet within its administrative boundaries. It has written to the other signatories to this MOU, together with its neighbouring authorities in Leicestershire and Northamptonshire to seek assistance in meeting this unmet need.

LIMITATIONS

For the avoidance of doubt, this Memorandum shall not fetter the discretion of any of the Councils in the determination of any planning application, or in the exercise of any of their statutory powers and duties, or in their response to consultations, and is not intended to be legally binding but shows clear commitment and intent to meeting the full housing and employment needs of the market area.

The objectively assessed need figures set out in this MOU have not yet been tested at examination and do not supersede the housing or employment land requirements in current local plans.

LIAISON

Member level representatives of the Local Authorities will meet when appropriate, in order to:

Maintain and update the memorandum, as necessary.

Monitor the preparation of Local Plans across the six authorities and discuss strategic issues emerging from them.

MONITORING

Annual monitoring will be carried out for both housing and employment. This will be overseen by the Joint Monitoring Officers Group (JMOG) for the Coventry and Warwickshire area, who will agree monitoring targets to include permissions and completions.

SIGNATORIES

Signed on behalf of Coventry City Council:

Date:

Signed on behalf of North Warwickshire Borough Council:

Date:

Signed on behalf of Nuneaton & Bedworth Borough Council: *Cllr Tony Venson*

Date: 26.06.2025

Signed on behalf of Rugby Borough Council:

Date:

Signed on behalf of Stratford-on-Avon District Council:

Date:

Signed on behalf of Warwick District Council:

Date:

Signed on behalf of Warwickshire County Council:

Date:

Appendix D – Areas of Disagreement: NBBC representations to Policy JE2 (extract)

Policy JE2: Provision of Employment Land and Premises identify sites to meet the OAN which results in a shortfall. NBBC considers that there is further work to be undertaken as employment land is sought beyond CCC administrative boundaries. CCC has undertaken a Housing and Economic Land Availability Assessment to identify a future supply of land. PPG sets out that the initial survey should take into account national policy and designations (Paragraph: 014 Reference ID: 3-014-20190722). The HELAA (2024) details that sites considered unsuitable will include policy constraints that restrict development, such as Green Belt (para. 3.33). NBBC agrees that this is appropriate to consider policy constraints as part of the initial survey.

The HELAA states that discounted sites that are not considered suitable will be clearly identified and not considered further through the local plan review process

(para. 3.34). The HELAA sets out that CCC is committed to maximising development on previously developed brownfield sites (para. 3.73) therefore Green Belt sites are discarded. The omission of sites after the initial assessment contributes towards a shortfall in employment land supply. No further analysis is undertaken following the initial assessment. NBBC does not agree that the assessment process ends after the initial survey. Where constraints are identified PPG sets out the procedures for stage 2 of the assessment. In cases where constraints are identified the assessment will need to consider what action could be taken to overcome them. PPG uses examples of constraints to overcome include policies in the National Planning Policy Framework and the adopted or emerging development plan (Paragraph: 021 Reference ID: 3-021-20190722). NBBC contends that NPPF Green Belt policy and the approach towards Green Belt in the emerging Local Plan are constraints to overcome.

The HELAA identifies 'Land North of A45 and West of Brickhill Lane' the site area is 11.81 ha and would help towards the identified need but is discarded due to Green Belt designations. The site is located in Green Belt Area 1: Northwest Coventry. The HELAA do not Green Belt Study Technical Update consider that the southern section of the site includes a recently built slip road and roundabout which gives access from the A45 to the nearby H2:2 Eastern Green SUE. This is a significant strategic infrastructure project which will give access from the strategic highway. According to the Green Belt Technical Update Study July 2024 the traffic island and slip road are within the Green Belt. There is no assessment of the presence on the of significant highway infrastructure which potentially harms the openness of the Green Belt in this area. The economic benefits of an employment site with immediate access to the strategic highway and within close proximity to other allocated employment sites and supply of labour are similarly not assessed. The result is a higher unmet need figure which could be potentially reduced when the constraints are assessed.

Policy JE2 seeks to protect certain employment sites from new economic