

## 1. INTRODUCTION

- 1.1 This Memorandum of Understanding (MoU) has been prepared in accordance with national guidance<sup>1</sup> 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).
- 1.2 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

## 2. GEOGRAPHY COVERED BY MEMORANDUM OF UNDERSTANDING

- 2.1 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.

## 3. PURPOSE

- 3.1 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.
- 3.2 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

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<sup>1</sup> Planning Practice Guidance Paragraph 011 Reference ID: 61-011-20190315

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

- 3.3 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.
- 3.4 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.

#### 4. POINTS OF AGREEMENT

- 4.1 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.
- 4.2 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**

<b>Authority</b>	<b>HEDNA Housing Need (dpa)</b>
Coventry	1455
North Warwickshire	119

Nuneaton and Bedworth <sup>2</sup>	409
Rugby	735
Stratford-on-Avon	868
Warwick	811
<b>Total</b>	<b>4397</b>

Source: Table 5.33 HEDNA 2022

- 4.3 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.
- 4.4 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**

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

Source: NPPF Standard Method December 2024

- 4.5 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.

<sup>2</sup> 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.

<sup>3</sup> See Footnote 2 regarding the figure for NBBC.

**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 <sup>4</sup>	41	52 <sup>5</sup>	-11
Coventry	105	60	45
Stratford	144	56	88
Warwick	83	37	46
<b>Total</b>	<b>492</b>	<b>244</b>	<b>248</b>

*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
<b>Total</b>	<b>572</b>	<b>244</b>	<b>328</b>

**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
<b>Total</b>	<b>670</b>	<b>244</b>	<b>426</b>

- 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:

<sup>4</sup> 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.

<sup>5</sup> Figure only includes allocated sites.

- 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 HEDNA<sup>6</sup>, 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 2023<sup>7</sup>.
- 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 – Icen 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

<sup>6</sup> See summary section 5, paragraph 5.159 to 5.161 of the HEDNA.

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

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.

## 5. POINTS YET TO BE RESOLVED

- 5.1 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.
- 5.2 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.
- 5.3 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.
- 5.4 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.

## 6. LIMITATIONS

- 6.1 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.
- 6.2 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.

## 7. LIAISON

- 7.1 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.

## 8. MONITORING

- 8.1 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.

## 9. SIGNATORIES

Signed on behalf of Coventry City Council: 


Councillor N Akhtar, Cabinet Member, Housing and Communities

Date: 27th August 2025

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: 28 July 2025

Authorised Officer: KAREN HILLMAN

Sign No. 75/25

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

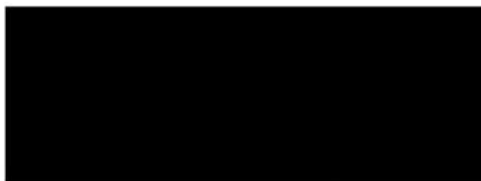
Susan Juned – Leader of the Council



Date: 21/10/25

Signed on behalf of Warwick District Council:


Councillor Ian Davison – Leader



Date: 15/08/2025

Signed on behalf of Warwickshire County Council:

Date: 05-Mar-26 | 15:35 GMT

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