

**Place Directorate**

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Reference:

Date: 27<sup>th</sup> June 2014

Dear Mr Barber

Please accept this letter as an officer holding response on behalf of Coventry City Council (in its role as Local Planning Authority) in response to Warwick District Council's new Local Plan - Publication Draft (May 2014). Due to the tight timescales involved and the timing of the period of representations we have been unable to obtain Full Council endorsement for this response prior to the deadline. As such, a further letter of endorsement (or amendment as appropriate) will be sent after Coventry's Council meeting on the 15<sup>th</sup> July 2014.

We welcome the opportunity to make representations to WDC's New Local Plan and wish to provide our response in the spirit of the Duty to Cooperate and in general support of your Local Plan. Our comments are therefore as follows:

1. Section 33A of the Planning and Compulsory Purchase Act 2004 (as introduced by the Localism Act 2011) establishes the 'Duty to Cooperate' and requires local authorities to engage constructively, actively and on an ongoing basis when developing their local plans and the evidence to support them. The 'duty' cannot be met retrospectively and cannot continue to be discharged in relation to this aspect of the WDC plan once it has been submitted to the Secretary of State. As such, we recognise the effort that WDC has put in to discharging their responsibilities in relation to this 'duty' as it relates to CCC. This includes numerous areas of joint working, most notably the work on the Coventry and Warwickshire Gateway proposals and the Joint Strategic Housing Market Assessment (SHMA).

Although the outcomes of the Joint SHMA have not yet been tested for Coventry, there remains a risk that it will not be possible to meet the needs of the city within its own boundaries. Given this uncertainty and the timing of the WDC Local Plan publication, CCC has sought to reassure itself that the WDC Local Plan makes adequate provisions to support CCC in meeting the city's needs should the situation arise. As part of this process we have noted that the Coventry and Warwickshire Joint committee has approved the development of further evidence to help determine the most sustainable location(s) within the County to meet this need should it be required. Furthermore, and

*Executive Director, Place*  
Martin Yardley  
*Assistant Director for Planning Transport  
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Colin Knight

most importantly, we recognise and welcome the inclusion of Policy DS20 of the WDC Local Plan and its supporting text.

This specific section of the plan acknowledges the potential issues facing Coventry and sets out a process whereby WDC will identify sites to help to meet Coventry's unmet needs within the WDC boundary should this be required and evidenced as the most sustainable option. It also commits to further work through the Duty to Cooperate as it will relate to a review of the Local Plan (post adoption) or the production of a supporting Development Plan Document. As already suggested we support this commitment and welcome its inclusion in the plan.

Furthermore, we recognise the policies positioning within the overarching development strategy chapter of the Local Plan, suggesting it forms a fundamental part of the plan and goes to the heart of its soundness and legal compliance. It is the view of CCC therefore that any subsequent attempt to go back on this commitment (following the identification of a need for Coventry) would render the WDC Local Plan out of date and unsound.

Having regard to the above the Council is satisfied that WDC have discharged their responsibilities in terms of the 'duty', as far as they relate to CCC with regards their Local Plan whilst also putting in place a firm commitment to supporting on-going cooperation as it will relate to CCC's Local Plan and subsequent planning documents.

2. As previously identified WDC and CCC worked jointly with its Warwickshire neighbours to Commission the Coventry and Warwickshire Strategic Housing Market Assessment, which was completed in November 2013. The Council supports WDC's intention to accommodate its own objectively assessed needs within its own boundary in accordance with this Joint SHMA.
3. As suggested above CCC and WDC have undertaken significant levels of joint working alongside the C&W LEP to support and promote the current development proposal referred to as the Coventry and Warwickshire Gateway. As such, CCC supports the allocation of this area as a sub-regional employment site in Policy DS16. The proposed development offers an opportunity for significant economic investment in the sub-region, creating new jobs and generating economic growth.
4. CCC recognises the important contributions the University of Warwick makes to the prosperity and reputation of Coventry and the wider sub-region. As such, we support the careful amendments to the Green Belt boundary being proposed in the plan, to help enable the continued delivery of the Universities masterplan.
5. The Council have reconsidered its position in relation to the land at Howes Lane, East of Finham. We recognise that the decision to allocate this land has not been taken lightly and appreciate that the need to consider existing Green Belt land is reflective of appropriate evidence and assessments that have informed the choice of housing sites. Notwithstanding, the Council wish to maintain on-going communications in relation to this site to ensure the servicing and overall impacts associated with the new homes do not place undue pressure on Coventry City Council resources. Subject to a satisfactory

approach in this regard, the City Council hold no objection to the allocation of this site. Please accept the Council's view on this as superseding previous correspondence in relation to this site.

To clarify, CCC supports the Local Plan being proposed by WDC and believes that it offers a sound and legally compliant basis upon which to bring forward sustainable development in Warwick District. At the same time, it offers a solid commitment and robust platform from which to continue active, constructive and on-going cooperation with Coventry City Council over the life time of the plan.

Lastly, I can confirm that should the Inspector consider it necessary and appropriate, Coventry City Council (as Local Planning Authority) are happy to attend any subsequent public examination in relation to the points made above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Andrews', with a stylized flourish underneath.

Mark Andrews  
**Acting Planning Policy Manager**