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Reference:

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Dear Ms Chapman,

Please accept this letter as an officer holding response on behalf of Coventry City Council in response to Rugby Borough Council's new Local Plan - Publication Draft (September 2016). Due to the tight timescales involved and the timing of the period of representations, which have overlapped with our own Local Plan examination process, 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 10<sup>th</sup> January 2017.

We welcome the opportunity to make representations to RBC'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 RBC plan once it has been submitted to the Secretary of State. As such, we recognise the effort that RBC 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:
  - a. the Coventry and Warwickshire Joint Strategic Housing Market Assessment (SHMA) and supporting updates and information papers (2013-2016);
  - b. The Coventry and Warwickshire Joint Green Belt review (2015);
  - c. The Joint SHLAA methodology (2015);
  - d. The Housing Requirements and Employment Memorandum of Understandings (2015 and 2016 respectively); and
  - e. The on-going work around employment land provision in so far as this relates to the sites at Pro-Logis Ryton and Ansty Park.

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

In this respect the Council is satisfied that RBC has discharged their responsibilities in terms of the 'duty'.

2. As previously identified RBC and CCC worked jointly with their Warwickshire neighbours to Commission the Coventry and Warwickshire Strategic Housing Market Assessment, which was completed in November 2013. The document has subsequently been updated and added to in 2014 and 2015 with a technical 'test' against the 2014 based SNPP (published in summer 2016). The Council supports RBC's intention to accommodate its own objectively assessed needs within its own boundary in accordance with this Joint SHMA. We also welcome the work undertaken by RBC to support the delivery of approximately 2,800 homes towards the city's unmet housing need – as set out within the Coventry and Warwickshire Housing Requirements MOU (2015).
3. In this same context we support the importance placed upon the employment sites at Ansty Park and Pro-Logis Ryton and recognise the consistency this has with the recent Coventry and Warwickshire Employment Land MOU.

Notwithstanding, as we highlighted within our response to your Preferred Option (February 2016), we understand that land south and east of Ansty Park continues to be promoted to support a high quality expansion of the site and create a significant number of new jobs. We are also mindful of the LEP's view and evidence suggesting a second 'sub-regional type' of employment site could be of benefit to Coventry and Warwickshire. In this context though we are mindful of over providing employment land relative to growth in work force and housing need, especially in the short term) and that aligning such provisions is an important aspect of Local Plan development – which we recognise as key component of the Employment MOU process.

However, we do wonder if there may be scope to 'safeguard' land within this area to support the future expansion of Ansty Park within subsequent plan periods. This would support the long term continuation of Ansty Park as a site of such high significance (as identified within your draft Plan). It would also link well to current and planned housing provisions in the area as well as planned highways infrastructure along the A46. It would also provide a longer term highly sustainable option to support long term jobs growth and economic prosperity for Coventry, Rugby and the sub-region.

4. Notwithstanding point 2 above, we would again refer back to our response submitted to your Preferred Options consultation. Within this response we highlighted the Councils support in principle for the delivery of sustainable residential development adjacent to the city's administrative boundary, especially where it could be linked to meeting the city's unmet housing needs and where it was supported by appropriate infrastructure. As part of the Preferred Options document the site at Walsgrave Hill Farm was promoted for approximately 1,500 homes. The site was also earmarked as supporting the delivery of the junction upgrades at the Clifford Bridge junction on the A46 and enhanced access arrangements to the University Hospital at Walsgrave. The promotion of this site also earmarked the potential for expansion of the existing employment provisions at Ansty Park – a long held ambition of the CWLEP. We are aware from our own consultation responses relating to our own Local Plan examination that a number of stakeholders – most notably the University Hospital, Highways England, Transport for West Midlands (previously the WMITA) and the CWLEP were supportive of this proposed allocation.

Through the development of the C&W Housing MOU the City Council was fully accepting of the sovereign role of each of its neighboring authorities to determine the most sustainable locations to meet their respective housing requirements. In light of the previous support for this site though and the strategic opportunities linked to it, we would seek further clarification as to why the site is no longer promoted within the Local Plan. Based on our current reading of the Plan and the Sustainability Appraisal this is unclear.

Furthermore, we note that Para 3.16 makes reference to the urban edge of Coventry but it is suggested that development in this location “would not assist in achieving sustainable development focused on Rugby Town”. We can appreciate this in the context of the overarching strategy but would have concerns that such a description could be construed as suggesting development on the edge of Coventry is not a sustainable option. You will be mindful from the work undertaken on the Housing MOU; our own proposals at Walsgrave Hill Farm; and the work undertaken by other Warwickshire neighbours that such options have been shown to represent sustainable development opportunities.

5. In addition to point 4, we note that the Coventry urban fringe is not referenced as a sustainable option within the settlement hierarchy policy. We suggested in our response to the Preferred Option that such an inclusion would be a sensible step to ensure the soundness of the Plan as it would have reflected the proposed development at Walsgrave Hill Farm. As highlighted above, we note that this site has now been removed from the Plan, however we do recognise the specific reference at Para 4.22 to exploring opportunities for providing Gypsy and Traveller sites adjacent to the city’s western boundary.

Whilst the city council withhold their judgment as to whether or not such provisions would be suitable in this location, we do have concerns that such proposals would appear to be in conflict with RBC’s settlement hierarchy policy. Either the western edge of the city is appropriate for residential provisions (mindful that national guidance encourages the consideration of sites for Gypsies and Travellers in a similar context to bricks and mortar accommodation) or it is not? In our view it is and as such should be referenced specifically within the settlement hierarchy policy. Should the urban edge of Coventry continue to be excluded from the settlement hierarchy it would be difficult to justify within the context of the RBC Plan how sites in this location could be considered to meet the needs of Gypsies and Travellers?

To clarify, CCC supports the Local Plan being proposed by RBC. However, for the reasons set out above we would seek further clarification as to why land adjacent to the western edge of Coventry is no longer featured within the Plan and why the urban edge of Coventry has not been appropriately included within the Settlement Hierarchy policy.

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

Yours sincerely



Mark Andrews  
**Planning and Housing Policy Manager**