

Warwick District Council's response to Coventry City Council's consultation on their 'New Coventry Local Development Plan (2011 - 2031) Delivering Sustainable Growth September 2014' consultation paper

Thank you for consulting Warwick District Council on the first stage on your Local Development Plan.

Duty to Cooperate: Warwick District Council recognises the description of Duty to Cooperate set out in section 4 of the document. We welcome the input of Coventry City Council is preparing joint evidence and in progressing effective cross boundary approaches to strategic issues such as the level and distribution of housing across the Housing Market Area. The continued commitment to Duty to Cooperate as set out in Chapter 4 is also welcomed and Warwick District Council looks forward to continued constructive dialogue as our Plans are prepared and reviewed.

Objectively Assessed Housing Need: Following the completion of the Joint SHMA Addendum in 2014, Warwick District Council considers that the evidence indicates that the Objectively Assessed Housing Need for the Coventry and Warwickshire Market Area is 4004 dwelling per annum. However we also consider that the distribution of this need across the HMA should be broadly consistent with the distribution indicated in the Joint SHMA as set out in Table 1. This would mean the Coventry's OAN would be 1180 per annum (23,600 over the Plan period). However, subject to this distribution being agreed by all authorities within the HMA, this leaves a shortfall of around 200-250 houses per annum. We suggest the evidence of the SHMA addendum points towards this shortfall being "owned" by Coventry. As agreed by the Economic Prosperity Board, we look forward to continued Duty to Cooperate discussions with Coventry and other Councils within the HMA to resolve this issue in due course. We would point out that if the Joint SHMA distribution was agreed by all the authorities, this would account for 94% of the HMA's housing requirement. In light of this the remaining 6% could be reasonably be planned for through a process of coordinated (or shared) early Plan reviews to provide for the latter stages of the plan period, subject to the authorities being able to jointly map out and commit to a shared process. This would allow decisions about the eventual distribution of any current shortfall to be based on a comprehensive evidence base, without delaying the progress of Plans that are already well advanced.

Distribution of Housing: Subject to the outcomes of the Joint Green Belt Study, Warwick District Council supports scenario 3. We consider the Coventry City Council should seek to meet as much of its housing need as possible within the City boundary. This is consistent with the principles and guidance of the NPPF and Planning Practice Guidance. We believe this will support a more vibrant and mixed City which in turn will be of benefit to the sub-regional economy. We also suggest that such an approach will enable regeneration and support the development of brownfield sites as required by the NPPF.

To achieve this, WDC will continue cooperation with Coventry City Council (CCC) as CCC's Local Development Plan emerges and continue constructive discussions on housing numbers, employment requirements, and joint evidence base on strategic issues (including the Joint Green Belt Review) and delivery, monitoring and green infrastructure.

Warwick District Council reserves the right to amend or remove this response to the Local Development Plan consultation if further evidence suggests this is necessary.