

Warwick District Council

Duty to Cooperate Statement Local Plan 2011-2029

January 2015



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1 Introduction

1.1.1 This document demonstrates how Warwick District Council has complied with the Duty to Co-operate in preparing the 2011-2029 Local Plan.

2 National Context

2.1 What is the Duty to Cooperate?

2.1.1 The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

2.1.2 The duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

2.1.3 Local planning authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. If a local planning authority cannot demonstrate that it has complied with the duty then the Local Plan will not be able to proceed further in examination.

2.1.4 Local planning authorities will need to satisfy themselves about whether they have complied with the duty. As part of their consideration, local planning authorities have to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters.

2.2 The Localism Act

2.2.1 The duty, as set out the Localism Act, requires Local Plan Authorities to 'engage constructively, actively and on an ongoing basis' on the preparation of development plan documents 'so far as relating to a strategic matter'. Strategic matters are defined as relating to:

a) sustainable development or use of land that would have a significant impact on at least two local planning areas including use of land in connection with infrastructure that is strategic and would have a significant impact on at least two planning areas; and

b) sustainable development or use of land in a two-tier area if the development or use is a county matter or would have a significant impact on a county matter.

2.2.2 The duty requires that councils set out planning policies to address such issues and requires them to consider joint approaches to plan making.

2.3 National Planning Policy Framework

- 2.3.1 The National Planning Policy Framework (NPPF) (2012) reinforces the Localism Act and sets out what is expected to ensure local planning authorities work collaboratively with other bodies to properly co-ordinate activity on strategic priorities across administrative boundaries. The NPPF requires that local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross boundary impacts when their Local Plans are submitted for examination.
- 2.3.2 Paragraph 156 of the National Planning Policy Framework sets out the strategic issues where co-operation might be appropriate. This encompasses
- the homes and jobs needed in the area;
 - the provision of retail, leisure and other commercial development;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - the provision of health, security, community and cultural infrastructure and other local facilities; and
 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 2.3.3 Paragraphs 178-181 give guidance on planning strategically across highlight the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area, through either joint planning policies or informal strategies such as infrastructure and investment plans.
- 2.3.4 Paragraph 179 states "... joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans."
- 2.3.5 Paragraph 180 states "...In two tier areas, county and district authorities should co-operate with each other on relevant issues. Local Planning Authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships...."
- 2.3.6 Paragraph 181 states "Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.

This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy. Co-operation should be a continuous process of engagement from initial thinking through to implementation”.

2.4 National Planning Practice Guidance

2.4.1 The National Planning Practice Guidance (2014), provides further guidance on how to fulfil the Duty to Cooperate. It explains that:

“The duty to cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. It is separate from but related to the Local Plan test of soundness.

The Local Plan examination will test whether a local planning authority has complied with the duty to cooperate. The Inspector will recommend that the Local Plan is not adopted if the duty has not been complied with and the examination will not proceed any further.

If the Inspector finds that the duty has been complied with, the examination will also test whether the Local Plan is sound.”

2.4.2 The National Guidance seeks to clarify the following:

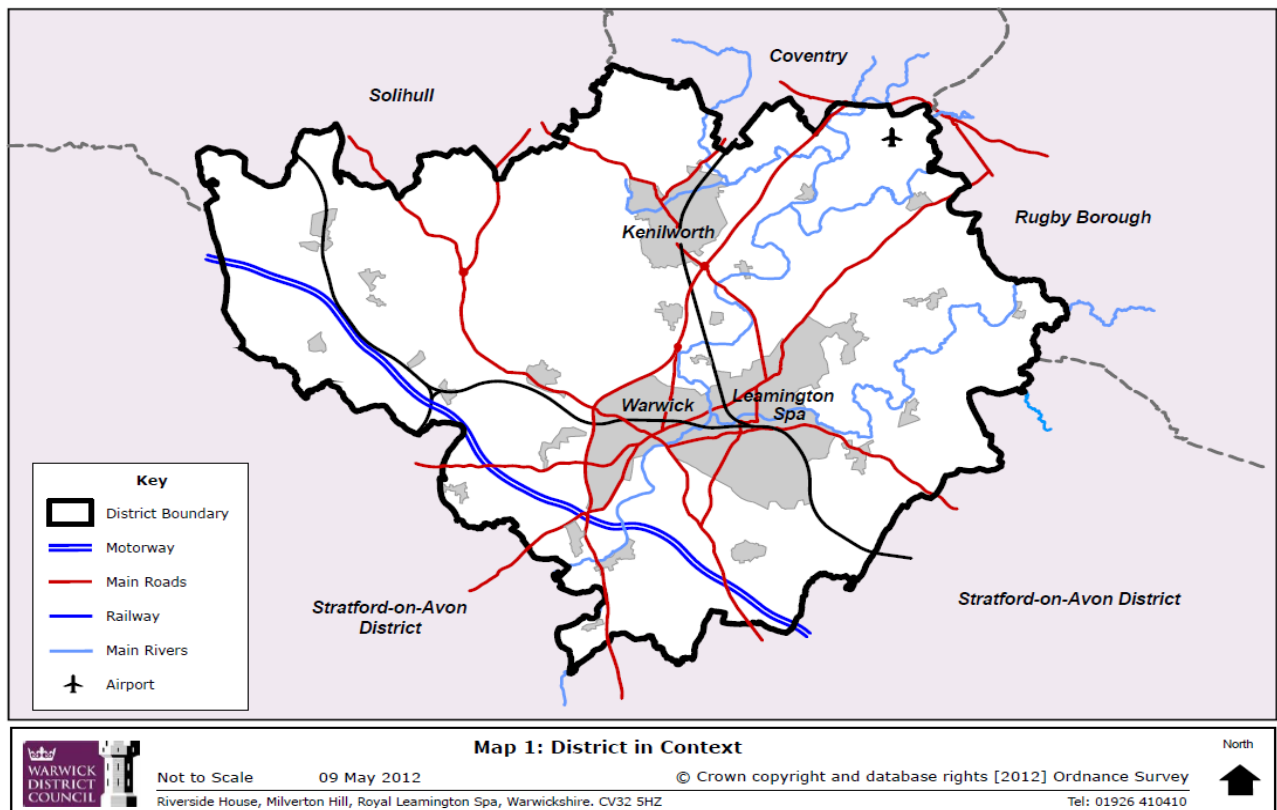
- The duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.
- Local authority officers and councillors have an important role to play in this process.
- The duty to cooperate seeks to ensure that local planning authorities lead strategic planning effectively through their Local Plans, addressing social, environmental and economic issues that can only be addressed effectively by working with other local planning authorities beyond their own administrative boundaries.
- The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by consultation alone.
- Cooperation between local planning authorities, county councils and other public bodies should produce effective policies on strategic cross boundary matters. Inspectors testing compliance with the duty at examination will assess the outcomes of cooperation and not just whether local planning authorities have approached others.

- The actions will depend on local needs which will differ, so there is no definitive list of actions that constitute effective cooperation under the duty. Cooperation should produce effective policies on cross boundary strategic matters.

3 Warwick District in Context

3.1.1 The District lies between the City of Coventry and rural parts of Solihull to the north, Stratford-on-Avon District to the south and Rugby Borough to the east. It has good transport links by rail to Birmingham and London and the M40 provides a good link to London and the south east as well as to the West Midland conurbation. These transport links mean that although located within the West Midlands, the District has some characteristics similar to the south east (see map 1).

Map 1



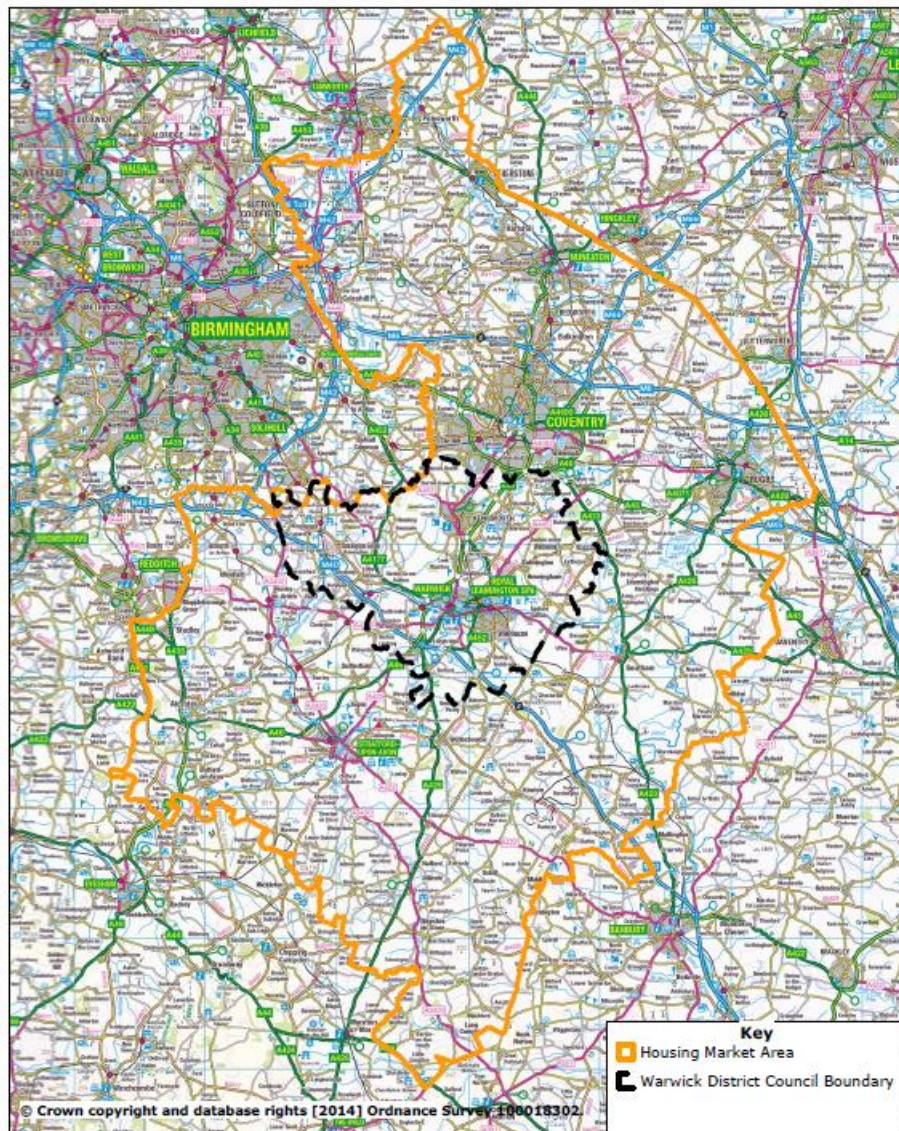
3.1.2 Warwick District is within the Coventry and Warwickshire Housing Market Area and the Coventry and Warwickshire Local Enterprise Partnership.


3.2 The Housing Market Area

3.2.1 In 2013 the Local Authorities within Coventry and Warwickshire published a Joint Strategic Housing Market Assessment (JSHMA). Chapter 3 of the JSHMA

defines the Coventry and Warwickshire Housing Market Area (CWHMA). Warwick District lies wholly within the CWHMA, although the north western part of the District borders Solihull Borough which lies within the Greater Birmingham Housing Market Area.

3.2.2 In defining the CWHMA, the JSHMA examines migration flows, commuting flows and house price differentials. This evidence shows that with regard to commuting and migration, Warwick District has a very strong relationship with Coventry, a significant relationship with Stratford District and a more minor relationship with Solihull Borough and Rugby Borough. With regard to house prices, the evidence shows the greatest synergy with Stratford District.



 **WARWICK DISTRICT COUNCIL**

Coventry and Warwickshire Housing Market Area

Scale 0 2 4 6 8 10 km SP2968 | 1:350000 @ A4 | 02/04/2014 | DSR | Grid Reference: 429301E, 268000N

Policy, Projects and Conservation, Development Services. ldf@warwickdc.gov.uk (01926) 456504

3.2.3 The Coventry and Warwickshire Housing Market Area has a strong relationship with the Greater Birmingham Housing Market Area as well as relationships with western parts of Leicestershire and Northamptonshire, northern parts of Oxfordshire and eastern parts of Worcestershire.

3.3 Coventry and Warwickshire Local Enterprise Partnership

3.3.1 The Coventry and Warwickshire Local Enterprise Partnership (CWLEP) covers the area administered by the following local authorities:

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

3.3.2 The CWLEP area coincides with the Coventry and Warwickshire Housing Market Area.

3.3.3 The CWLEP has close links with the local authorities within the area and its Board includes 6 elected members (2 from the City Council, 2 from the County Council and 2 drawn from the 5 District & Borough Councils). The CWLEP has recently restructured to ensure it is fully aligned with the local authority structures, with a new Operational Group, comprising CWLEP Board members and Council Leaders drawn from the Joint Committee (see section 4.3) and an Executive/Secretariat of, predominantly Council officers.

3.3.4 The CWLEP has established a number of Business Groups, including one focussing on Planning and Housing. This group, comprising of private sector and local authority members aims to support and facilitate the delivery of housing and employment sites and plans across the CWLEP area and remove perceived barriers to development.

3.3.5 The group works closely with Council Planning Policy teams to commission and deliver studies and reports to provide evidence to underpin joint work. Having contributed to the formulation of the CWLEP's initial Strategic Economic Plan (SEP) the Group will play a key role in ensuring the SEP review, planned for the post-election period, is closely aligned with the Local Plans across the sub-region.

3.3.6 The Business Group will also lead on the Green Belt Review (see 5.4 below) and the future development of a sub-regional spatial strategy, fully aligned with future SEP revisions.

3.3.7 The CWLEP developed the Coventry and Warwickshire City Deal, signed by Government in December 2013, which covers the whole of the CWLEP area and also the neighbouring district of Hinckley & Bosworth, within Leicestershire. The City Deal required the establishment of the Joint Committee (see 4.2).

3.4 Two Tier Working: Warwickshire County Council

3.4.1 Warwick District is within a two-tier area, with Warwickshire County Council providing public services such as education, highways and social services. Along with Warwickshire County Council, for this reason, it is particularly important that Warwick District Council co-operates with Warwickshire County Council, and that clear evidence is presented that demonstrates that all aspects of the Duty have been complied with. Of particular importance in this cooperation is working together on planning and delivering infrastructure such as schools, transport network, economic development, libraries, public health, emergency services and adult care, all of which are predominantly County Council services.

3.4.2 In addition, the County Council have important strategic planning functions in relation to waste and minerals. It is important the Local Plan aligns with these strategic plans.

3.5 Neighbouring Local Authorities

3.5.1 Warwick District borders 4 other local planning authorities. With Warwickshire, Stratford-on-Avon District adjoins the District to the south and west and Rugby Borough adjoins to the east. The unitary authorities of Coventry and Solihull adjoin to the north and north-west. This direct interaction with adjoining areas takes a number of forms. In terms of people, interaction is often seen in the form of journeys to workplaces, to places of education, to shops, healthcare and other facilities, and to visit friends and relations. Of these different types of journeys, commuting to and from work and places of education tends to have the greatest routine impact on the transport network.

3.5.2 In addition, interaction with neighbouring areas comes in other forms such as migration in and out of the District to live as well as the distribution of raw materials and goods to and from other parts of the country to support the national and global economy. The District has strong environmental links with different areas, for example through its river valleys and sources of water supply. There are sub-regional green infrastructure links that pass through the District which are beneficial not only in terms of supporting biodiversity but also in helping manage the impacts of climate change, and in supporting leisure and recreational uses.

4 Cooperation Processes and Governance

- 4.1.1 Within the Coventry and Warwickshire sub-region, a number of processes have been established to ensure Duty to Cooperate is undertaken effectively. These processes ensure Duty to Cooperate is fulfilled at a sub-regional level, between different tiers of local government and at more local level. Further processes ensure effective Duty to Cooperate within the West Midlands Region and neighbouring housing market areas. Warwick District Council takes an active role in these processes.
- 4.1.2 In addition to the ongoing Duty to Cooperate processes, there are a number of a temporary or informal processes that are also important in supporting Duty to Cooperate with other prescribed bodies and neighbouring authorities
- 4.1.3 This section describes these processes and the governance which surrounds them to show how effective cooperation is assured.

4.2 Coventry and Warwickshire Local Enterprise Partnership and the Strategic Economic Plan

- 4.2.1 Warwick District is within the Coventry and Warwickshire Local Enterprise Partnership (CWLEP) area. The CWLEP was established to promote sustainable growth and job creation across the sub-region. The Council plays an active role within the CWLEP and the Leader of the Council is currently one of two representatives from the District and Borough Councils on the CWLEP Board.
- 4.2.2 The CWLEP governance structure includes a number of 'business' groups. One such group is the Planning and Housing Group, which brings together representatives from the development industry and the local authorities. The Council plays an active part in this group, the role of which includes assessing emerging development plan documents to ensure CWLEP views are fed in to the plan making process.
- 4.2.3 The CWLEP commissioned and led the recent sub-regional update on employment land availability (the Coventry and Warwickshire Strategic Employment Land Study) and has also been active in identifying and assessing the availability of major employment sites within the sub-region. The outputs of this work have informed the Local Plan.
- 4.2.4 The CWLEP has prepared the Strategic Economic Plan (SEP) for the sub-region as well as playing a lead role in City Deal and the Local Growth Fund which bring valuable investment for infrastructure, amongst other things. (see paragraphs 5.3.3, 5.3.4 and 5.3.5 for further details regarding the SEP).

4.3 Coventry and Warwickshire Joint Committee for Economic Growth and Prosperity

- 4.3.1 Coventry and Warwickshire Joint Committee for Economic Growth and Prosperity was established in 2014. It is comprised of the Leader of each of

Coventry and Warwickshire's 7 local authorities as well as Hinckley and Bosworth Borough Council. It has two key roles:

- To consider how the work of the Councils can best be coordinated to deliver economic prosperity in conjunction with the CWLEP and including inputs in to the delivery and review of the SEP
- To oversee Duty to Cooperate activities including signing of key elements of the subregional evidence base and agreeing coordinated responses to the evidence in the development and delivery of local plans.

4.3.2 Specifically it aims to:

- Jointly develop with the CWLEP economic and growth strategies for the EPB area and be responsible for their delivery;
- Jointly develop with the CWLEP joint investment strategies for the EPB area and be responsible for their delivery;
- Consider, approve and co-ordinate the development and implementation of decisions relating to investment in the EPB area, including expenditure of external funding;
- Agree and facilitate effective integrated collaborative arrangements for the following functions across the constituent members of the EPB:
 - economic development;
 - regeneration
 - strategic planning (including spatial planning and housing)
- Produce, in September of each year, an annual report to the Executive of each of the constituent authorities on its work in the preceding municipal year

4.3.3 The EPB has evolved from the Coventry and Warwickshire Joint Committee which met for the first time in March 2014 and which has played an active role in Duty to Cooperate including supporting an approach to ensure any housing shortfall is dealt with collectively.

4.4 Coventry and Warwickshire Chief Executives/Managers

4.4.1 This group comprises the most senior Council official (or their representative) from each of Coventry and Warwickshire's 7 local authorities. It meets prior to each EPB meeting to agree the EPB agenda and report recommendations. This group has recognised the vital role of local plans/core strategies in shaping the sub-region and has therefore played a very active role in Duty to Cooperate including detailed discussions on sub-regional housing requirements and distribution, economic prosperity and strategic infrastructure provision.

4.5 Coventry, Solihull and Warwickshire Association of Planning Officers

4.5.1 The Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) is comprised of the Head of Planning (or their representative) from the 8 Councils within Coventry, Solihull and Warwickshire. CSWAPO is a long established group which since the 2010 Localism Act has taken a lead role in driving Duty to Cooperate discussions and activities. This has included

- Commissioning the Joint Strategic Housing Market Assessment
- Commissioning a review of the green belt
- A sub-regional Green Infrastructure Strategy
- Coordinating responses to development plan consultations
- Themed discussions and joint decisions (for instance covering flooding, broadband infrastructure, biodiversity offsetting etc)

4.5.2 During 2014, Warwick District Council has held the Chair of CSWAPO

4.5.3 CSWAPO is supported by a number of sub-groups. These have evolved over time according to specific requirements. At the start of 2014, it was agreed to form a specific Duty to Cooperate sub group comprised on the officers leading on the development core strategies/local plans within each planning authority. This group ensures sufficient time is dedicated to understanding and discussing the implications of sub-regional evidence so that CSWAPO, the Leaders Board and the EPB can make informed decisions based on a shared understanding amongst the lead planning officers. This group has also been involved in commissioning sub-regional studies as required by CSWAPO, the Leaders Board and the EPB. Examples of this include commissioning and managing work to review the Joint SHMA following the publication of the 2012 population estimates and the commissioning of a Joint Green Belt study for the Coventry and Warwickshire area.

4.5.4 During 2014 a Monitoring Sub Group has also been established. The Terms of Reference of this group are still to be agreed, but in recognition of the increasing importance of monitoring in informing future growth requirements, it has been agreed that the group needs to ensure consistent approaches to monitoring housing and employment delivery and land availability. Specifically, the group will ensure coordination of timing, method and reporting of monitoring data to inform the extent to which the SEP is being delivered, future sub-regional working and the need for local plan/core strategy reviews.

4.5.5 As described above, various pieces of work of a strategic nature have been commissioned on a sub-regional basis and are referred to in the section 5 below. As an example of the outcomes arising from this joint working, the SHMA produced an evidence base that has been used as a starting point for on-going discussions about the quantum of housing to be delivered in each

district. These discussions have been undertaken through CSWAPO and its associated Duty to Cooperate Sub Group and within the EPB. This has ensured that the strategic issues relating to the level and distribution of housing growth have been shared across the sub-region and are supported by a sound and shared evidence base.

- 4.5.6 The joint approach is ongoing. Each of the authorities in the sub region is at a different stage in preparing its local plan or core strategy. The capacity within each of the other districts to deliver the housing requirement in full is therefore not known. In this context, the potential remains that one or more authority will not be able to meet its housing requirement within its boundaries. The Council has therefore been working closely with the other authorities in Coventry and Warwickshire to agree a robust process to address this issue should it arise. This process has been agreed by the Joint Committee (now the EPB) and is set out in Policy DS20 of the Draft Local Plan.

4.6 Cooperation with Greater Birmingham Housing Market Area

- 4.6.1 A joint sub-regional approach is also being adopted to address issues arising in adjoining housing market areas, particularly the Birmingham and Solihull area. Whilst the full implications of this are not yet known there is likelihood that at least some Councils within the Coventry and Warwickshire sub-region will be approached to accommodate some growth from neighbouring housing market areas. It has therefore been agreed that any housing shortfall arising from outside the CWHMA will also be addressed using the approach agreed.
- 4.6.2 To ensure the Councils that make up the CWHMA are fully appraised of issues arising in neighbouring housing market areas, CSWAPO members have worked with the Greater Birmingham Housing Market Area to ensure the employment and housing needs and capacity of that area are understood. The CSWAPO Duty to Cooperate Sub-Group routinely receives feedback from this liaison work and representatives from the Greater Birmingham HMA have been invited to and have attended the Coventry and Warwickshire Duty to Cooperate Sub Group.
- 4.6.3 In addition, representatives from the Greater Birmingham HMA have attended CSWAPO to ensure shared issues are understood and can be addressed.

4.7 The South Warwickshire M40 Corridor Steering Group

- 4.7.1 This is a non-executive body established in August 2013 by Stratford-on-Avon and Warwick District Councils and Warwickshire County Council. Each council is represented by the member with portfolio responsibility for planning and/or transportation issues plus their senior officer advisors, including the Chief Executive of each District authority. The Group's remit is to consider the cumulative impacts of development proposed in the emerging development plans for the two areas.

4.8 Bilateral Cooperation with Neighbouring Planning Authorities

- 4.8.1 Whilst there are no regular bilateral Duty to Cooperate meetings with neighbouring planning authorities, frequent liaison takes place at a political, senior management and senior planner levels. For Warwick District, this is particularly the case with Coventry City Council and Stratford-on-Avon District Council, although liaison with Solihull and Rugby does also take place.
- 4.8.2 These meetings/processes tend to be arranged to address strategic issues that are of common concern between the two authorities. Examples include:
- Joint working with Coventry City Council to consider the implications of the sub-regional employment site allocation/Coventry and Warwickshire Gateway Planning application
 - Joint working with Coventry City Council to coordinate plans for the future development of Warwick University
 - Joint working with Stratford-on-Avon District Council to consider the implications of major employment land allocations across the two districts
 - Joint working with Stratford-on-Avon District Council regarding the potential to allocate sites in village close to the boundary between the two Districts (for example Norton Lindsey)
 - Joint working with Coventry City Council regarding the implications of sites allocated close to the City boundary (e.g Oaklea Farm)
 - Joint working with Stratford-on-Avon District Council to consider a joint approach to contributions towards acute health services

4.9 Prescribed Bodies

- 4.9.1 The 2011 Localism Act sets out a number of prescribed bodies for the Duty to Cooperate. These organisations are required to cooperate with local planning authorities and the other prescribed bodies. These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters. Cooperation is required with each of these bodies in the preparation of the Local Plan. Cooperation with each of the Prescribed Bodies can be summarised as follows:
- 4.9.2 **The Environment Agency:** regular an ongoing liaison with the Environment Agency has taken place. This has included cooperation in the preparation and publication of flood risk information, advice on flood mitigation in relation to the allocation of potential sites and advice on the Flooding and Water Policies. The Environment Agency have played an active role in shaping the Flooding and Water policies within the Draft Local Plan and influencing a range of other policies. The Council is continuing to work actively with the Environment Agency to achieve a statement of common ground with regard to the Draft Local Plan

4.9.3 **The Historic Buildings and Monuments Commission for England** (known as English Heritage): As well as making representations to consultations throughout the plan making process, there has been regular and ongoing liaison with English Heritage during the plan making process. For instance, English Heritage has been involved with the preparation of the Plan through a number of informal channels including:

- Meetings to advise on effective use of the Heritage Settings Assessment Methodology
- Providing advice on the brief to review the setting and mitigation relating to the Thickthorn Roman Settlement
- Reviewing settings assessment reports in relation to key sites (such as South of Gallows Hill, the Asps and Thickthorn)

4.9.4 Recent liaison with English Heritage has focused on trying to resolve all the concerns raised by them through the regulation 20 consultations. This has result in a Statement of Common Ground between English and Warwick District Council.

4.9.5 **Natural England**: As well as being a statutory consultee at each stage of the Local Plan preparation, Natural England has been involved in the preparation of plan in the following ways:

- Reviewing and agreeing HRA assessment
- Involvement in Warwickshire, Coventry and Solihull Green Infrastructure Strategy,
- Involvement in the 2012 Strategic GI Assessment including part funding the study
- Involvement in Warwickshire, Coventry and Solihull Biodiversity Offsetting scheme
- Membership of the Warwickshire, Coventry and Solihull Habitat Biodiversity Partnership Steering Group (C&W&S)

4.9.6 **The Mayor of London**: N/A

4.9.7 **The Civil Aviation Authority (CAA)**: The CAA have confirmed that there is no need for further discussion with them regarding policies to ensure the safe operation of aerodromes. They advised that discussions need to take place with the airports concerned. Coventry Airport have confirmed that the policies in the Local Plan cover their operational requirements.

4.9.8 **The Homes and Communities Agency (HCA)**: Cooperation with the HCA has taken place during the preparation of the Plan. This has involved close working to enable the delivery of a key Local Plan housing allocation at Station Approach, Leamington Spa. The HCA have purchased this site with a view to enabling a comprehensive scheme to come forward. The HCA have worked

closely with the Council and a social housing provider to maximise the delivery of affordable housing on this site. The Council has also kept the HCA appraised of other sites which have the potential to deliver affordable housing (for example the HCA site tour on 1/8/13). The HCA (ATLAS) have also been involved with supporting and advising the Council on a coordinated development approach for the masterplanning of the sites to the south of Warwick and Leamington which are in multiple ownership. This work is ongoing and seeks to ensure effective delivery of the sites in a way that brings forward sustainable communities and infrastructure.

- 4.9.9 **Clinical Commissioning Group (CCG):** Cooperation has taken place with the NHS South Warwickshire CCG in preparing the Local Plan and in particular on planning the infrastructure required to support a growing population. The CCG have indicated that NHS England (Local Area Team) are the key organisation in help in the planning of GP Services and the Infrastructure Delivery Plan reflects their advice. The CCG have reviewed the infrastructure plans provided to the Council by the South Warwickshire Foundation Trust and have confirmed that they are broadly supportive of these. Contact with the CCG has also been maintained at a senior management level between the two organisations in addressing funding opportunities to improve and rationalise GP Services across the District and in particular to support improved services and combined facilities in Warwick and Lillington, with the latter forming an important of the emerging regeneration proposals for that area.
- 4.9.10 **National Health Service Commissioning Board:** NHS England have played an active role in the planning of GP Services for the Infrastructure Delivery Plan. NHS England have provided information regarding current capacity within the GP Services, projected requirements and investment costs required to meet future requirements. This information has informed the proposals within the Infrastructure Delivery Plan.
- 4.9.11 **The Office of Rail Regulation:** See ORR advice note on Localism Act 2011 (Delivering ORR's duty to cooperate). The Office of Rail Regulation was contacted in September 2014 and again in January 2015 setting out the proposals contained within the Local Plan with regard to rail. The ORR has indicated that they have no issues with the rail proposals set out in the Plan.
- 4.9.12 **Transport for London:** N/A
- 4.9.13 **Integrated Transport Authority:** N/A (Please note: Centro covers Coventry and the West Midlands Metropolitan authority areas. However public transport within Warwickshire is the responsibility of the County Council).
- 4.9.14 **Highway Authority (Warwickshire County Council):** Extensive and ongoing cooperation with the Highway Authority has taken place throughout the preparation of the Local Plan. This has involved working together on strategic transport assessments to help inform the distribution of development and infrastructure requirements. In addition, detailed work has

taken place to consider the potential for sustainable transport modes as part of the local plan and site infrastructure. Regular liaison meetings have taken place to ensure this work is effective and aligns with the Local Plan.

4.9.15 **The Marine Management Organisation:** N/A

5 Strategic Issues

5.1 Introduction

5.1.1 The National Planning Policy Framework explains that public bodies have a Duty to Cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. These are:

- the homes and jobs needed in the area
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

5.2 Strategic Issue: Homes needed in the area

5.2.1 Warwick District Council has worked closely with all the Councils in the Coventry and Warwickshire Housing Market Area to assess and provide for the homes that are needed. In particular, two studies have been commissioned, prepared and published to provide a shared evidence base for the housing requirement of the Housing Market Area: The Joint Strategic Housing Market Assessment (JSHMA), November 2013 and the Addendum to the JSHMA, September 2014.

5.2.2 **The Joint Strategic Housing Market Assessment (JSHMA), November 2013:** this study covered the whole of the Coventry and Warwickshire Housing Market Area (see para 3.2 above). It considered the following variables regarding housing need:

- Existing housing stock and supply trends
- Housing market dynamics
- Demographic and economic drivers

5.2.3 From an assessment of this data it drew conclusions about housing need in relation to:

- The overall housing requirement for the HMA and its constituent Districts
- Affordable Housing
- Sizes and types of homes
- The needs of specific groups in the population.

5.2.4 This study was used as the basis for extensive Duty to Cooperate discussions amongst Planning Officers (for instance at CSWAPO and its Duty to Cooperate Sub-Group) and Chief Executives/Managing Directors (for instance at the Leaders Board meetings) which culminated in a report to the Coventry and Warwickshire Joint Committee in March 2014. Based directly on the JSHMA outcomes, this meeting confirmed support for a housing requirement of 75000-76000 dwellings for the HMA between 2011 and 2031 (3750-3800pa). It also confirmed the distribution of this requirement between the six local planning authorities. Warwick District's Publication Draft Local Plan was prepared on this basis. The JSHMA was also used as the basis for the Publication Draft Plan's policies regarding affordable housing, mix of housing and student accommodation.

5.2.5 **The JSHMA Addendum, September 2014:** This study was jointly commissioned by the six local planning authorities in the HMA to consider the implications of:

- The 2012 Sub National Population Projections published in May 2014
- Updated economic forecasts
- A review of market signals and household formation rates

5.2.6 The study indicated that the updated evidence (particularly the 2012 Sub National Population Projections) has implications for the HMA's Objectively Assessed Need and for the distribution of this need across the HMA.

5.2.7 During and following the completion of the study, further Duty to Cooperate discussions took place regarding the HMA's housing requirement and the distribution of this. Whilst the study showed only a minor change to the overall HMA requirement, it indicated that there could be a case to re-consider the distribution of the housing requirement. However, the Duty to Cooperate discussions recognised that whilst there could be a case for a greater focus of growth on Coventry, the City would be highly unlikely to be able to meet the resulting need within the City boundary.

5.2.8 Therefore, at its meeting on 21st November 2014 the Coventry and Warwickshire Joint Committee for Economic Growth and Prosperity agreed the following:

- Agree that the OAN for the whole of the HMA is as set out in the new (2014) JSHMA document at 4,004 homes per annum;
- Agree that, given the current starting point for the distribution of housing across the HMA is as set out in the table below, the process and timetable set out in Appendix Three is followed to agree a revised distribution:

	Proposed Distribution of Housing No's
Coventry	1,180
North Warwickshire	175
Nuneaton & Bedworth	495
Rugby	660
Stratford-on-Avon	540
Warwick	720
Additional Housing Need	234
TOTAL (HMA)	4,004

- Agree to carry out a review in the form of a Joint Core Strategy for the whole of the sub region starting no later than 2017 to be complete by 2020 relating to a period to 2041 (but recognising the need to start earlier if required to meet other housing needs from outside the HMA).

5.2.9 Warwick District's Submission Draft Local Plan reflects this agreement.

5.2.10 Looking beyond the Coventry and Warwickshire Housing Market Area, representatives of the C&WHMA have liaised closely with the Greater Birmingham LEP area to consider the implications of housing requirements arising within the Greater Birmingham area. At the time the Submission Draft Local Plan was prepared, the need for Coventry and Warwickshire to play a part in meeting any unmet housing need arising in the Greater Birmingham area had not been clearly defined. Discussions between the two HMAs are therefore ongoing and Warwick District Council is fully committed to the approach for dealing with this agreed by the Economic Prosperity Board and as set out in the Submission Draft Local Plan.

5.2.11 **Gypsies and Traveller Housing Needs and Provision:** The production of the Gypsy & Traveller Accommodation Assessment (GTAA) gave ample opportunity to liaise with adjoining local authorities including Warwickshire County Council, with regard to both the numbers of Travellers and the nature of their accommodation need. Warwick District Council is however, ahead of most of the adjoining authorities with this work having commenced a review of the Local Plan before others. This has resulted in a deeper understanding of the problems locally, with Warwick district currently having no provision for Gypsies and Travellers and being constrained by a large area of the district being within the Green Belt. There is pressure on other districts to provide a large number of pitches within their area with little ability to meet that demand so preventing any possible cross border sharing of sites.

5.2.12 Warwick District has been an integral part of a two specific groups meeting regularly to discuss the provision of Gypsy and Traveller sites and services throughout the county. This includes a county wide 'Special Interest Group' chaired by the Gypsy Liaison Officer at Warwickshire County Council and bringing together planning and housing officers from the district councils, together with representatives for education, health and the police. More recently a group of district housing officers have started meeting on a regular basis with planning officers and the Gypsy Liaison Officer to specifically discuss the provision of suitable sites/additional pitches and the potential to share emergency stopping places provided by WCC. In addition to this, both formal and informal meetings take place between officers dealing with the provision of sites within their district, on an ad hoc basis. A close working relationship has been formed in particular with Rugby Borough Council and Stratford on Avon District Council, which resulted in a joint consultation event on the edge of Stratford district for residents who could be affected by the provision of a potential site within Warwick District.

5.3 Strategic Issue: Jobs needed in the area

5.3.1 Warwick District Council has worked closely with the Local Planning Authorities within the sub-region, the County Council and the Local Enterprise Partnership (LEP) to identify and plan for employment growth. Cooperation has been undertaken to address a number of key issues to ensure the area has the jobs it needs.

5.3.2 **Strategic Economic Plan and City Deal:** the Council has played an active role with the CWLEP and other Councils in the sub-region to agree a City Deal. This seeks to build on the high value advanced manufacturing and engineering (AME) sectors in the sub region, particularly the automotive sector in which the sub-region has more than five times the average concentration of employment. It recognises a series of barriers to further growth in these sectors which it seeks to overcome to amongst other things deliver: over 15,000 new jobs by 2025 including 8,800 in the advanced manufacturing sector, and growth in 450 advanced manufacturing and engineering companies within the local area. Within Warwick District, the City Deal provided capital funding of £559,000 for highway improvements to facilitate development in Research & Development at Fen End (Former Honiley Airfield). The Council recognises the role of this site and its importance in the sub region through policy MS2 of the Local Plan.

5.3.3 The SEP was published in March 2014 and set out the sub-region's economic aspirations along with infrastructure investment requirements to support this. The Council has been involved in the joint working which led to the publication the SEP. The SEP provides evidence of co-operation that has produced a distinctive sub-regional identity and spatial strategy. It prioritises support for growth in the advanced manufacturing and engineering sector, referencing the importance of research and development and innovation. In this context the SEP identifies an employment site in the vicinity of Coventry Airport as being

important in supporting the sub-region's growth aspirations. It also acknowledges to importance of the planned expansion of Jaguar Land Rover at Gaydon, which although lying outside Warwick District has synergies with growth proposals in the adjoining District of Warwick.

- 5.3.4 Since the SEP was published in March 2014, the Government has agreed a Local Growth Deal with the CWLEP for the sub-region, providing capital funding allocations, predominantly for infrastructure projects and skills/employment initiatives, based on the strategy outlined within the SEP. This includes some substantial investment within Warwick District such as improvements to the A46 "Stanks Island".
- 5.3.5 However, it should be noted that a number of significant proposals from the SEP have not yet been funded. The CWLEP will be reviewing and updating the SEP in summer 2015 to inform any future Growth Deal 2 proposals. This review will provide the opportunity to ensure greater consistency between the SEP's growth aspirations and the robustly evidenced growth proposals of the Local Plan (and indeed the Local Plans of other Councils within the CWLEP area).
- 5.3.6 **Coventry and Warwickshire Strategic Employment Land Study, October 2014:** this study, commissioned by the LEP, but with active participation from all the local planning authorities in the sub-region, was prepared to undertake an assessment of future employment land requirements in the sub-region. This considered quantitative need through a range of demand scenarios reflecting past completions and future demographic and economic trends but also took account of the need to ensure employment land within the district is flexible to support inward investment and market choice. The existing employment land supply across the area including the availability and suitability of major employment sites within the sub-region was considered in assessing future requirements.
- 5.3.7 Taking account of the supply the study identified a minimum quantitative shortfall in readily available employment sites amounting to 129hectares but that the sub region should aspire to deliver potentially more good quality employment land in order to offer the local and inward investment market sufficient choice and flexibility. This reflected continuation of past trends boosted by targeted investment in new advanced manufacturing and engineering activity as set out in the City Deal above.
- 5.3.8 To meet this shortfall it was recommended that the CWLEP and local authorities should consider the identification and allocation of a small number of sector-focused strategic employment sites which are large and flexible enough to meet future needs. The Coventry and Warwickshire Gateway site was assessed to be best placed to fulfil the leading role as the sub region's premier strategic employment site. The Council has therefore provided for this within the Local Plan by allocating it as a sub-regional employment site. This recognises that the site has a significant role in meeting the employment needs of the sub region and supporting the growth aspirations of the CWLEP.

- 5.3.9 The Council has worked with Coventry City Council in assessing the Gateway site as sub regional employment site. This has included joint working on assessing the planning applications, as well as commissioning economic and demographic forecasting work to understand the impact of the site on housing need.
- 5.3.10 The allocation of the site has been discussed at Duty to Cooperate sub group meetings and as part of the development of the Strategic Employment Land Study during which there has been verbal support from other local authorities within the sub region to its allocation within the Local Plan.
- 5.3.11 **Balancing housing growth with employment growth** (JSHMA): the Council is continuing to work with all the authorities in the sub-region and the CWLEP to ensure that ambitions for future jobs growth as may be articulated in future reviews of the Strategic Economic Plan and in Local Plans, is balanced with an appropriate level of housing growth. The CWLEP and all the local authorities in the sub-region have indicated support for the levels of economic and housing growth set out in the Draft Local Plan. However, continued alignment across the sub-region is important, and the Council is committed to reviewing its Plan should monitoring data regarding jobs growth and/or housing delivery indicate that there is a need to do so to support sub-regional ambitions

5.4 Strategic Issue: Green Belt

- 5.4.1 The vast majority of the District's rural area lies within the Warwickshire Green Belt. The Green Belt encircles the City of Coventry and covers parts of all the Warwickshire Districts as well as Coventry itself. The Warwickshire Green Belt adjoins the West Midlands Green Belt.
- 5.4.2 The Council has worked closely with the other Local Planning Authorities within Coventry and Warwickshire to ensure up to date evidence with regard to the Green Belt and to ensure that this evidence is used to support effective planning.
- 5.4.3 Joint Green Belt Study 2009: The Joint Green Belt Study 2009 assessed Green Belt parcels principally around the fringe of urban areas in Coventry, Rugby, Nuneaton and Bedworth and Warwick. This study was originally prepared to inform each LPA's allocations through their respective Local Development Framework documents and provided a consistent basis to the assessment of areas of Green Belt.
- 5.4.4 Joint Green Belt Review 2015: In April 2014, the Economic Prosperity Board agreed to undertake a further review of the Green Belt in both the areas covered by the 2009 study, but also Stratford-on-Avon District and North Warwickshire Borough. At the time of writing, this study is being prepared and it is anticipated that the first stage will be published in the late spring of 2015, with stage two (Stratford and North Warwickshire) to follow by the end of the year. This study will provide the starting point for assessing capacity to

addressing unmet housing needs within the Coventry and Warwickshire Housing Market Area and any future reviews of development plans.

5.4.5 The Green Belt has been used to shape spatial planning within the sub-region over many years, including through the West Midlands Spatial Strategy and the Warwickshire Structure Plan. More recently, examples where shared evidence on the green belt has influenced cross boundary working include:

- The assessment of the Gateway Planning application (with Coventry City Council)
- The preparation of the Strategic Economic Plan
- The Warwick University Masterplan (with Coventry City Council)

5.5 Strategic Issue: Retail and Leisure provision

5.5.1 During 2011, during the initial stage of the plan preparation, CSWAPO discussed the ongoing validity of the retail hierarchy that had formed part of the Regional Spatial Strategy. These discussions concluded that although the retail hierarchy should still provide a useful starting point for considering the role of the sub-region's retail centres, there was no need to formally continue with a retail hierarchy and a decision was taken not to include retail issues within the statement of common ground being prepared at that time. In this context WDC has sought to maintain the role of Leamington TC as a sub-regional centre through the Local Plan and also to recognise that Warwick and Kenilworth Town Centres play an important local role.

5.5.2 The Local Plan seeks to allocate land for retail-lead development in Leamington Town Centre to support its sub-regional role. This is being actively pursued through a project team which includes a WCC representative to ensure issues around transport are considered.

5.5.3 In recognition on the changing nature of Town Centres, WCC are currently undertaking a study on the role of cinemas in supporting or regenerating Town Centres. WDC is actively supporting this study to build understand of the role of cinemas in Leamington and the District's other towns.

5.5.4 The Warwick District Retail and Leisure Study 2014 considered the role of the District's Town Centres in the context of the retail offers across the sub-region. This included undertaking survey work to inform the study from an area that cross well beyond the District's boundaries

5.6 Strategic Issue: Provision of Infrastructure

5.6.1 The Council has worked with a range of Infrastructure providers, the County Council and neighbouring local authorities to prepare a draft Infrastructure Deliver Plan to support the Local Plan proposals.

5.6.2 At its meeting on 16th January 2015 the Joint Committee for Economic Growth and Prosperity considered a report on a strategic Infrastructure Delivery Plan

covering the whole of the CWLEP area. This report was prepared through joint working between the County Council, Coventry City Council and the Warwickshire District Councils. The approach agreed seeks:

- To collate the infrastructure information drawn from the various Local Plans and the Strategic Economic Plan into one document to include the status of the source plans and dates (if known) for adoption/ refresh etc.
- To develop a GIS based mapping tool to map the various layers of proposed infrastructure across the EPB geography
- To review the IDP on a regular basis, recognising that this data is subject to constant change

5.6.3 The agreed objectives of the Strategic IDP are to:

- support a strategically led approach to the future development of infrastructure in support of sustainable and effective communities and economic growth.
- ensure the efficient use of available funding and enable innovative and joined up solutions
- demonstrate to Government, effective joined up working across the EPB area in support of funding bids through Growth Deals.

5.6.4 WDC's Infrastructure Delivery Plan has been important in informing a first draft of this strategic document and in turn WDC's IDP will continue to evolve to reflect emerging strategic infrastructure priorities

5.6.5 The Council has worked closely with WCC and neighbouring Councils to plan for infrastructure requirements in relation to specific proposals and allocations which have cross boundary implications. Examples of this include:

- Working with Warwickshire County Council, Coventry City Council and the Highways Agency to plan transport improvements in relation to the Gateway planning application/sub-regional employment site allocation
- Working with Warwickshire County Council and Stratford District Council to consider the implications of the housing and employment allocations at Gaydon/Lighthorne Heath
- Working with Warwickshire County Council and Stratford District Council to consider the cross boundary educational implications of the housing and employment allocations at Gaydon/Lighthorne Heath
- Working with South Warwickshire Foundation Trust and Stratford District Council to consider the how the two hospitals in the Trust's management can be expanded and improved to better support the growth proposed in both Council's Local Plans.

5.7 Strategic Issue: Flood risk

- 5.7.1 A Level 1 Strategic Flood Risk Assessment (SFRA) was completed for Warwick District in 2013 which updates a previous sub-regional report which was undertaken in 2008 covering the wider area of Coventry, Solihull and Warwickshire.
- 5.7.2 The results of the SFRA identify the risks from flooding and enable the Sequential Test to be applied to the allocation of sites for development. Referring to data provided by the Environment Agency and Severn Trent Water, the SFRA has produced a set of maps which show the Flood Zones 1, 2 and 3 and incorporate additional information to illustrate the potential result of climate change (Flood Zones 3a and 3b).
- 5.7.3 Warwickshire County Council holds and maintains a set of maps covering the whole County.
- 5.7.4 Warwick District Council's drainage engineering team, shares information and working with the Environment Agency, Severn Trent Water, Warwickshire County Council Highways department, Warwickshire County Council Flood Risk Team and the Canal and Rivers Trust, as well as advising on planning applications and current best practice.
- 5.7.5 The Environment Agency is responsible for the production of the Severn River Basin Management Plan, which includes measures to protect and improve the water environment, as well mitigating for effects of flooding.
- 5.7.6 Severn Trent Water has been involved with the plan preparation and have confirmed that there are no strategic water supply issues which will influence the Local Plan development strategy. Severn Trent Water has also indicated that it will be able to upgrade the District's sewerage network and Waste Water Treatment facilities as required as development sites come forward across the district. Work undertaken with Severn Trent and the other lower tier authorities in Warwickshire on the Warwickshire Sub-Regional Water Cycle Study, 2010 confirms this.
- 5.7.7 Discussions are on-going between Severn Trent Water and the promoters of a new settlement at Gaydon/Lighthorne Heath in Stratford District concerning the upgrading of the sewerage network and waste water treatment capacity. These discussions take into account the growth proposed in Warwick District with a Position Statement issued by STW in May 2014.
- 5.7.8 Working with the Environment Agency on the Water Cycle Study and the wording of the Local Plan policy will ensure that planning permission will only be granted where it can be demonstrated that there would not be any adverse impacts on water quality.
- 5.7.9 Collaboration with the Environment Agency in relation to a number of studies (The Water Cycle Study, The SFRA, The River Severn Catchment Flood Management, The River Severn Basin Management Plan and the Water

Resources Management Plan) and through the Local Plan consultations, led to Local Plan policies FW1 and FW2 being rewritten to reflect current good practice. The EA confirms that it considers the published plan to be compliant with the duty to cooperate. The Council and the Environment Agency are working on a Statement of Common Ground regarding the Local Plan.

5.8 Strategic Issue: Waste management and the provision of minerals and energy

- 5.8.1 Warwickshire County Council (WCC) is the authority responsible for waste management and the provision of minerals. In co-operation with WCC, WDC has worked to ensure that policies within the relevant documents therefore complement one another.
- 5.8.2 WCC has not forecast a need within the Local Plan period, in its Waste Local Plan (2013) to develop any new waste management facilities, however, WDC has committed to assist and work with WCC should the need arise to either develop a new facility or expand an existing facility. WDC is a consultee for any waste management issues affecting the District.
- 5.8.3 In terms of minerals, WCC is currently working on a Minerals Plan to replace the former Minerals Core Strategy (a Local Aggregates Assessment having been published in 2014). WDC has information on a GIS constraints layer which alerts the need to consult the mineral authority if developments lie within a safeguarded area or consultation zone (usually gravel and sand alongside the river). WDC works with WCC, including through the Local Plan process to ensure that any such zones are avoided or excluded from built development to assure the protection of and future potential exploitation of minerals in its area. These are areas of sand and gravel resource rather than permitted sites of which currently Warwick District has none.

5.9 Strategic Issue: conservation and enhancement of the natural and historic environment, including landscape.

- 5.9.1 **Warwickshire, Coventry and Solihull Green Infrastructure Strategy, 2013:** this was prepared by Green Infrastructure Sub-group of CSWAP0 and identified key elements of the sub-region's Green Infrastructure assets in terms of landscape, accessibility and biodiversity. This document was subject to a 6 week period of consultation and two stakeholder workshops were held. It's preparation also included involvement from the emerging Local Nature Partnership for region. The outcomes of this study in relation to biodiversity enhancement areas, have informed the Local Plan's Natural Environment policies.
- 5.9.2 **Warwick District Strategic Green Infrastructure Assessment 2012:** this study was part funded by Natural England. It examined Green Infrastructure opportunities in Warwick District. To ensure it took account of wider linkages the study involved input from the Environment Agency, Natural England,

Warwickshire Wildlife Trust and Warwickshire County Council. The study has informed the green infrastructure element of the Infrastructure Delivery Plan.

- 5.9.3 **Warwickshire, Coventry and Solihull Biodiversity Offsetting Scheme:** The scheme, led by the Green Infrastructure Sub-group of CSWAPO, was one of 6 pilots to test the principle of Biodiversity Offsetting. Through the pilot, a refined collective approach was established to both Biodiversity Offsetting and the principles behind ecological assessments for quantifying ecological loss or gains. This has been incorporated within the Local Plan's Natural Environment policies.
- 5.9.4 **Habitat Biodiversity Audit:** this project covering Coventry, Solihull and Warwickshire has been ongoing for over 20 years and continues to provide a basis for assessment of potential development sites and where relevant protection of local features. In preparing the Local Plan, the Audit has informed the preparation of the SHLAA and site selection matrix. It is incorporated within the Natural Environment policies.
- 5.9.5 **Landscape:** the 2008/9 Joint Green Belt Study referred to in paragraph 5.4.3 also included a landscape assessment of each parcel. To ensure consistency across the study area, these assessments drew on National Landscape Character Areas identified by Natural England and on the Warwickshire Landscape Guidelines. This study has provided a starting point for more detailed landscape assessment work within the District looking at specific areas and sites.
- 5.9.6 **Historic Environment:** Warwick District Council has worked closely with English Heritage (EH) and Warwickshire County Council (WCC) to ensure that the policies contained in the Submission Local Plan reflect not only the NPPF but also current good practice in the protection and enhancement of nationally and locally recognised historic assets. This extends to the public realm, historic street patterns, particularly in Warwick and historic landscapes.
- 5.9.7 The advice of English Heritage has also been sought at each stage of the process in the production of a number of Heritage Assessments which have been produced to inform the Local Plan in terms of impact of new development on the historic environment and on the setting of Listed Buildings and Scheduled Monuments within or in close proximity to such development.
- 5.9.8 Based on this cooperation, the Council and English Heritage are working on a Statement of Common Ground regarding the Local Plan. This seeks to confirm the way in which the comments submitted by EH have been adopted or adapted to lead to a set of robust and effective policies dealing with the historic environment.