



DUTY TO COOPERATE STATEMENT OF COMPLIANCE JANUARY 2026

CONTENTS

1. Introduction	4
2. background.....	5
Strategic context	5
strategic matters	5
the Rugby borough local plan	5
3. Engagement between the Council and bodies prescribed in the DtC	6
Coventry, Solihull Warwickshire Association of Planning Officers	6
Housing Market Area (HMA) and Functional Economic Market Area (FEMA) – Memorandum of Understanding (MoU)	8
Joint Monitoring Group.....	8
The A5 partnership/working group	8
NHS Rugby Local Estates Forum	9
National Capital Assessment Partnership (NCAP)	9
Other neighbouring authorities	9
West Northamptonshire Council	9
Hinckley and Bosworth Borough Council.....	9
Harborough District Council.....	10
Blaby District Council	10
Prescribed Bodies.....	10
Environment Agency	10
Historic England	11
Natural England.....	11
The Office of Rail and Road.....	12
National Highways	12
Warwickshire County Council Highways.....	12
The NHS Coventry and Warwickshire Integrated Care Board (ICB).....	12
The NHS Leicestershire Integrated Care Board (ICB)	13
Warwickshire, Coventry and Solihull Local Nature Partnership	13
The Civil Aviation Authority	13
Homes England	13
4. Strategic Issues.....	14
Growth Needs and Land supply	14
Housing	14
Gypsy and Traveller Accommodation	14
Employment.....	15

Site Assessment Methodology	16
Critical Infrastructure	16
Energy	16
Health.....	17
Education	17
Transport.....	17
Highways	17
Rail.....	17
Rapid Transit	18
Flood risk and water resources.....	18
Natural Environment	18
5 Summary of Duty to Cooperate Outcomes.....	19
Dialogue and engagement.....	19
Jointly produced evidence	19
Conclusion.....	19
5 Appendices	20
Appendix 1 – Map of Borough in context	20
Appendix 2 – Duty to Cooperate Log.....	21
Appendix 3 – Memorandum of Understanding	31
Appendix 4 – Duty to Cooperate Letter regarding Gypsy and Traveller Accommodation	39
Appendix 5 – Duty to Cooperate responses – Gypsy and Traveller Accommodation	48
Coventry City Council	48
.....	49
Blaby District Council	49
Harborough District Council.....	50
Hinckley and Bosworth Borough Council.....	50
Nuneaton and Bedworth	51
.....	52
Stratford on Avon District Council	52
Warwick District Council	53
Appendix 6 – Gypsy and Traveller Accommodation Meeting notes, October 2025	55
Appendix 7 – Natural England correspondence	57
Appendix 8 – Notes of DtC Meeting with West Northamptonshire Council	58

1. INTRODUCTION

- 1.1. The Duty To Cooperate (DtC) is a legal test that requires cooperation between Local Planning Authorities and other prescribed bodies. It is a requirement under Section 110 of the Localism Act 2011 (which added Section 33a of the Planning and Compulsory Purchase Act 2004) to fulfil the DtC. It requires ongoing active and constructive dialogue and agreement to maximise the effectiveness of local plans on strategic, cross boundary matters.
- 1.2. This statement sets out how Rugby Borough Council (RBC) has complied with the DtC in preparing its local plan (2025-2042).

2. BACKGROUND

STRATEGIC CONTEXT

- 2.1 Rugby Borough is one of 5 boroughs/districts within the county of Warwickshire. On its western side, the borough shares administrative boundaries with Coventry City, Stratford on Avon District and Warwick District. On its eastern side, the borough meets the County of Leicestershire and the districts of Harborough and Blaby, plus the borough of Hinkley and Bosworth. Rugby borough shares a boundary with West Northamptonshire to the south east. A map illustrating the borough in the context of neighbouring authority areas is included in appendix 1.
- 2.2 The borough incorporates the town of Rugby, which is the single large urban area, plus a number of rural settlements varying in size.

STRATEGIC MATTERS

- 2.3 The NPPF (paragraph 20) outlines the key strategic issues where cooperation may be appropriate.
- 2.4 The principal strategic matters being addressed through the Duty to Cooperate (DtC) in the Rugby Borough Local Plan are:
- Meeting housing need
 - Meeting employment need, including strategic sub-regional needs and in light of the identified shortfall in the Coventry City administrative area.
 - Transport and infrastructure matters
 - Environmental matters
- 2.5 Constructive engagement and cooperation is ongoing with neighbouring local planning authorities, Warwickshire County Council and other prescribed bodies on these matters. Engagement and cooperation throughout the plan making process are set out within this statement, and in the engagement log included in appendix 2. Furthermore, Statements of Common Ground are in preparation to outline areas of agreement and outstanding matters with DtC partners.

THE RUGBY BOROUGH LOCAL PLAN

- 2.6 The strategic objectives of the local plan are identified as:
- 1) Support the diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy
 - 2) Support the revival of Rugby town centre
 - 3) Reduce carbon emissions and adapt to climate change
 - 4) Raise design standards
 - 5) Deliver infrastructure-led growth
 - 6) Facilitate a greener, more biodiverse borough

3. ENGAGEMENT BETWEEN THE COUNCIL AND BODIES PRESCRIBED IN THE DTC

COVENTRY, SOLIHULL WARWICKSHIRE ASSOCIATION OF PLANNING OFFICERS

3.1 The Coventry, Solihull & Warwickshire Association of Planning Officers (CSWAPO) comprises officers (policy team managers or representatives) from the seven councils within the area:

1. Coventry City Council (CCC)
2. Nuneaton and Bedworth Borough Council (NBBC)
3. North Warwickshire Borough Council (NWBC)
4. Solihull Metropolitan Borough Council (SMBC)
5. Stratford on Avon District Council (SDC)
6. Warwick District Council (WDC)
7. Warwickshire County Council (WCC)

3.2 Until May 2025, a representative of Hinckley and Bosworth Borough Council (HBBC) also routinely attended the group. Hinckley and Bosworth Borough shares an administrative boundary with Rugby as set out in the strategic context section. At the request of Hinckley and Bosworth Borough Council, they do not now routinely attend meetings, and instead attend upon invitation where discussion would be relevant. This is due to having fewer strategic issues in common with most of the participants, as they are not part of the same Housing Market Area (HMA) or Functional Economic Market Area (FEMA).

3.3 The CSWAPO group pre-dates the Duty to Cooperate (DtC), demonstrating a long history of cross boundary working in the area. Since the introduction of the Localism Act 2011, CSWAPO has taken a lead role in driving DtC across the area.

3.4 The group meets monthly, and is the primary body for working with partners in determining strategic issues to be addressed and how to achieve necessary outcomes through the plan-making process. Through collaborative working, CSWAPO determined the key strategic matters for Coventry and Warwickshire to be those listed below (table 1). Sub-groups were established to consider each issue. Outputs from these workstreams are also included in table 1 below.

Table 1 – CSWAPO strategic issues and work outputs

Strategic Issue	Commentary	Key outputs
Growth needs and land supply	Relevant to the HMA and FEMA, so includes Coventry and Warwickshire authorities, but Solihull and Hinckley and Bosworth are beyond the scope of this issue.	<ul style="list-style-type: none"> • HEDNA (2022) • HELAA methodology • WMSESS-HEDNA Alignment Paper (2024) – to compare employment needs identified in the West Midlands Strategic Employment Study with needs identified

Strategic Issue	Commentary	Key outputs
		in the HEDNA <ul style="list-style-type: none"> • WMSESS-HEDNA Alignment Paper Addendum (2025)
Critical infrastructure	Primarily related to health and energy infrastructure	Presentations to understand the broader planning for growth by providers – e.g. National Grid
Transport	Related to all CSWAPO authorities.	Agreeing mechanism for updating transport evidence.
Water	Involved engagement with the Environment Agency, Severn Trent Water, and the Lead Flood Authorities who were engaged in the development of evidence base documents supporting local plans across Coventry and Warwickshire. Output documents form part of the evidence base for the local plan.	<ul style="list-style-type: none"> • Joint Strategic Flood Risk Assessment (SFRA) (2022) • Joint Water Cycle Study (WCS) (2024)
Natural environment	Related to all CSWAPO authorities.	<ul style="list-style-type: none"> • Sub-regional Green Infrastructure Strategy (2024)

3.5 Once work on the joint evidence outputs was complete, the sub-groups had achieved their initial purpose, and were at risk of duplicating joint working elsewhere. As a result, they were disbanded following the monthly CSWAPO meeting in February 2025.

3.6 Key strategic priorities were redefined in relation to the local plan preparation of member authorities. These have been, and continue to be discussed and facilitated through the regular monthly meetings, and task specific meetings as appropriate.

3.7 The latest strategic priorities can be summarised as:

- Climate Change
- Employment (local and strategic employment needs)
- Environment
- Housing (including Gypsy and Traveller Accommodation needs at Rugby Borough's request)
- Strategic Infrastructure and Transport

3.7 As part of these priorities and as a result of Coventry City's more advanced stage of plan preparation, a sub-group of CSWAPO members in the HMA and FEMA attended a number of DtC meetings between September and December 2024. These meetings were specifically targeting progress on Coventry's housing and employment needs.

3.8 Coventry has identified an employment land shortfall and has formally asked for assistance from CSWAPO authorities. The Development Needs Topic Paper notes (paragraph 3.36) that Rugby Borough's publication local plan could in principle contribute to meeting part of Coventry's unmet need, and Coventry City Council and other CSWAPO members have been advised (CSWAPO meeting 10 December 2025).

- 3.9 The sub-group DtC meetings also discussed and progressed a Memorandum of Understanding (MoU). Further information regarding the MoU is included below.
- 3.10 Rugby Borough Council officers additionally set up a meeting to specifically discuss Gypsy and Traveller Accommodation on 08 October 2025 (notes in appendix 6). This is included in the log attached in appendix 2, and further discussed in section 4 of this statement.

Housing Market Area (HMA) and Functional Economic Market Area (FEMA) – Memorandum of Understanding (MoU)

- 3.11 The MoU sets out the areas where there is agreement between the parties and where there are remaining matters yet to be resolved. The areas to be resolved relate to the employment shortfall arising from Coventry and a request from Rugby Borough Council for a wide range of partners to assist with its Gypsy and Traveller need.
- 3.12 The MoU is attached at Appendix 3. It has been signed by Coventry City Council, Nuneaton and Bedworth Borough Council, Warwick District Council, Rugby Borough Council, and Stratford-on-Avon District Council. At the time of writing, Warwickshire County Council is yet to sign but has indicated its intent to do so. This matter is highlighted in the summary log in appendix 2.
- 3.13 North Warwickshire Borough Council has determined not to sign the MoU until there is agreement on how the shortfall in Coventry's employment land will be met is reached.
- 3.14 The MoU is an overarching document. It should be noted that in the previous round of plan preparation for the authorities concerned, the MoU approach was effectively utilised to demonstrate co-operative working and therefore this approach has been carried forward. It serves as a sub-regional Statement of Common Ground, covering the matters cited in the Planning Practice Guidance. The MoU states that it will be followed by a series of Statements of Common Ground with each party. Statements of Common Ground will address more localised issues where necessary.
- 3.15 Rugby Borough's local plan has progressed since the authority signed the MoU, with an updated position regarding Coventry City's unmet employment need. A Statement of Common Ground has been agreed in relation to Coventry City Council's local plan (September 2025), and another will be prepared in relation to Rugby Borough's emerging local plan.

Joint Monitoring Group

- 3.16 The Joint Monitoring Officers Group is attended by planning and monitoring officers across the Coventry and Warwickshire Housing Market Area. The group shares monitoring data, 5 year housing land supply updates and other information pertinent to the DtC.

THE A5 PARTNERSHIP/WORKING GROUP

- 3.17 Rugby Borough Council is a member of the A5 Partnership. The A5 runs along the eastern edge of the borough, where it adjoins Leicestershire authorities. The neighbouring authorities of Hinckley and Bosworth, Nuneaton and Bedworth, Harborough, Blaby, and West Northamptonshire are also part of this partnership.
- 3.18 This partnership comprises upper and lower tier local councils along the A5 through the area (including authorities in Northamptonshire, Warwickshire and Leicestershire), alongside other agencies, including National Highways, Midlands Connect, East Midlands Councils and Homes England.

3.19 There are two sub-groups which meet regularly. One is an officer group and the other includes elected members.

3.20 The objectives of the partnership are:

- To raise awareness of the increasing economic role of the A5 through the Midlands
- To collaborate and effectively plan for growth impacts on the A5
- To make the case for future investment and improvements to the A5 and tackle congestion.

NHS RUGBY LOCAL ESTATES FORUM

3.21 Rugby Borough Council attends the Local Estates Forum, which discusses estates matters related to healthcare. These meetings are included in the log in appendix 2.

NATIONAL CAPITAL ASSESSMENT PARTNERSHIP (NCAP)

3.22 Rugby Borough Council (RBC) contributes annually to and is a member of the NCAP which is administered by Warwickshire Wildlife Trust and hosted by Warwickshire County Council. Other partners are Coventry City Council, Solihull Metropolitan Borough Council, Warwickshire County Council and the other four Warwickshire districts/boroughs.

3.23 The RBC Development Strategy Manager attends regular NCAP steering group meetings.

3.24 The NCAP has been in existence since 1995. It surveys and undertakes habitat mapping across Coventry, Solihull and Warwickshire. It surveys potential local wildlife sites and makes recommendations to the local wildlife site panel.

OTHER NEIGHBOURING AUTHORITIES

West Northamptonshire Council

3.25 West Northamptonshire Council (WNC) made representations to both the Issues and Option and Preferred Option consultations.

3.26 The Preferred Option representation observed potential cross boundary considerations related to proposed site allocations and an omission site close to the administrative boundary, as well as noting potential cross boundary benefits from the proposed Rugby Parkway Station. These were discussed in a DtC officer meeting in May 2025 (notes included in appendix 8), and on an informal basis in December 2025.

3.27 Some of the allocations discussed (as proposed at Regulation 18 stage) are not included in the proposed Submission local plan, and a new policy relating to the Rainsbrook Valley's enhanced sensitivity has been included. These matters were highlighted to WNC in December 2025.

3.28 Rugby Borough Council wrote to WNC in April 2025 to request assistance with meeting identified Gypsy and Traveller Accommodation need (see section 4 of this statement). This matter was also discussed in the meeting held in May 2025.

Hinckley and Bosworth Borough Council

3.29 As set out above, until May 2025, Hinckley and Bosworth Borough Council (HBBC) routinely attended

meetings of CSWAPO. From that time, it was agreed that a representative of HBBC would attend where invited to discuss relevant cross-boundary matters.

3.30 HBBC submitted a representation to the Preferred Option consultation. This representation made some comments on points of detail and noted potential cross boundary issues, with particular reference to impacts on the A5 highway (see also A5 Partnership above, which both Rugby Borough and Hinckley and Bosworth are part of).

3.31 Rugby Borough Council wrote to its neighbouring local authorities in April 2025, including HBBC, regarding unmet need for gypsy and traveller accommodation (see section 4 of this statement).

Harborough District Council

3.32 As identified in the engagement log (appendix 2), DtC meetings were held in April, September and October 2024 with Harborough District Council (HDC). Whilst these were set up principally by HDC to discuss its emerging local plan, these also provided opportunity to discuss the direction of travel of the Rugby local plan. Further informal engagement has also taken place. Key cross boundary matters with HDC are employment land, and proposed expansion at Magna Park, adjacent to the A5. HDC, like Rugby Borough Council is a member of the A5 Partnership (see above).

3.33 A further meeting with HDC is scheduled on 20 January 2026 this will be focused on transport and employment land.

3.34 A Statement of Common Ground was agreed with HDC in respect of its local plan in March 2025.

3.35 Rugby Borough Council wrote to HDC (and other neighbouring authorities) in April 2025 to highlight it's unmet Gypsy and Traveller Accommodation need. This matter is noted in the aforementioned Statement of Common Ground (March 2025).

Blaby District Council

3.36 As noted in the engagement log (appendix 2), a DtC meeting was attended with Blaby District Council in June 2025. The principal cross boundary issues were noted as employment land and gypsy and traveller accommodation need.

3.37 Rugby Borough Council wrote to Blaby DC (and all other neighbouring authorities) in April 2025 to highlight its identified unmet Gypsy and Traveller Accommodation need. Blaby replied in April 2025, as set out in section 4 of this statement.

PRESCRIBED BODIES

3.38 All bodies prescribed under the Duty to Cooperate are actively encouraged to engage in the plan making process. However, the degree of active engagement is dependent upon the strategic matters that need to be addressed.

3.39 The following sets out how and when prescribed bodies have been engaged throughout the plan-making process. These will be supplemented with Statements of Common Ground (SoCG) were appropriate.

Environment Agency

3.40 The Environment Agency has been directly engaged in the preparation of the joint CSWAPO evidence

as referenced in Table 1. This evidence includes the joint Strategic Flood Risk Assessment (SFRA) and the joint Water Cycle Study (WCS). These documents form part of the evidence base upon which the plan has been developed.

3.41 The Environment Agency made representations under the Issues and Options Consultation (Regulation 18). Comments which related to issues considered to be strategic include:

- Directing development to areas of lowest flood risk
- Water supply and foul disposal
- Contaminated land
- Climate change

3.42 A further representation was made to the Preferred Options Consultation. The key strategic issues can be summarized as:

- Flood risk – application of the sequential test
- Requirement for a SFRA Level 2 as part of the evidence base to reduce flood risk.
- Water quality and wastewater infrastructure – recommending assessment of headroom to accommodate proposed allocations.

3.43 The matters summarised above from the representations have been considered and explored in the Consultation Statement. The SFRA Level 2 and Water Cycle Study (stage 2) are both published as part of the submission local plan (Regulation 19) evidence base, and further address points raised. The Water Cycle Study Stage 2 notes input and feedback from the Environment Agency in its preparation.

Historic England

3.44 Historic England made representations under both the Issues and Options, and Preferred Options consultations (both made under Regulation 18).

3.45 Historic England's representation to the Issues and Options consultation observed that the issues considered did not include the historic environment either as a standalone issue nor did it appear interwoven in the issues that were identified. It recommended that the historic environment should be interwoven through the spatial strategy and policies.

3.46 The representation made to the Preferred Option Consultation made a number of detailed recommendations and suggestions in respect of specific policies and proposed allocations. However, it noted that generally the historic environment has been positively interwoven in the plan, and evident within policy topics and site selections. In addition, the representation comments on the clear integration of feedback provided to the Issues and Options consultation.

Natural England

3.47 Natural England made representations under both the Issues and Options, and Preferred Options consultations (both made under Regulation 18). In submitting its representation to the Preferred Option consultation, Natural England requested that it should be read in conjunction with the Issues and Options representation.

3.48 In its representation at the preferred options stage Natural England stated that it does not support some proposed employment allocations due to sensitive designated sites:

- Ansty Business Park expansion A46 Walsgrave (specifically refer to omission site 121)
- Prologis/Mountpark, Ryton (this site is not an allocation in the proposed submission plan)
- Safeguarded Land, South West Rugby

- 3.49 The Council has sought a DtC meeting with Natural England to discuss the representations and any arising DtC matters. Natural England has declined to meet, citing lack of resources to meet (see appendix 7).

The Office of Rail and Road

- 3.50 The Office of Road and Rail has not made formal representations on the local plan consultations to date, although they were made aware of both consultations made under Regulation 18.

National Highways

- 3.51 National Highways is part of the A5 Partnership, alongside Rugby Borough Council and other Warwickshire and Leicestershire Authorities the A5 runs through (see section 2 above). This is a regular forum to discuss potential mitigation along the A5 corridor.
- 3.52 National Highways made a representation to the Preferred Option consultation. This advocated for the production of a Strategic Transport Assessment (STA). This has since been undertaken (see Warwickshire County Council Highways below), with matters identified for ongoing discussion with National Highways.
- 3.53 The authors of the STA (SLR Consulting) are contacting National Highways to discuss the outcomes at the time of writing.

Warwickshire County Council Highways

- 3.54 Rugby Borough Council has engaged with the Local Highways Authority (LHA) throughout the preparation of the local plan. The LHA provided initial high-level advice on sites within the Stage 2 Site Assessment process which informed site selection for the Preferred Option version of the plan. This is acknowledged and explained in paragraph 4.10 of Warwickshire County Council's (whole organisation and not just as LHA) representation to the Preferred Option consultation.
- 3.55 The Strategic Transport Assessment (STA) was commissioned by the LHA on behalf of WCC and Rugby Borough Council. Joint meetings were held with LHA officers, RBC officers and consultants SLR Consulting throughout the progress of producing the STA.
- 3.56 In its wider representation to the Preferred Option consultation, Warwickshire County Council stated (paragraph 4.11):

"The STA will comprise WCCs transport response to the Preferred Options and will form the basis of the transport evidence base through the Local Plan examination process..."

- 3.57 A Statement of Common Ground with Warwickshire County Council Highways will be prepared.

The NHS Coventry and Warwickshire Integrated Care Board (ICB)

- 3.58 Rugby Borough Council has engaged with the Coventry and Warwickshire Integrated Care Board (ICB) through the preparation of the plan. This has included attendance of the regular Local Estates Forum, and bilateral meetings regarding specific matters relating to the local plan and required infrastructure for primary care. Meetings were held with the Coventry and Warwickshire ICB in April, September and October 2025, as set out in the log in appendix 2.
- 3.59 The ICB also made representations to the Preferred Option consultation.

The NHS Leicestershire Integrated Care Board (ICB)

- 3.60 Although the NHS Coventry and Warwickshire Integrated Care Board (ICB) is the principal ICB for the borough, a northern area of the borough (including Wolvey), comes under the NHS Leicestershire ICB. As a result it has been necessary to liaise with this body throughout the plan-making process, especially given the extent of allocations proposed at Wolvey in the Regulation 18 Preferred Option Plan.
- 3.61 A meeting was held in June 2025 as set out in the DtC log in appendix 2. It should be noted that the extent of proposed allocations at Wolvey has been substantially reduced in the proposed Submission Plan.

Warwickshire, Coventry and Solihull Local Nature Partnership

- 3.62 RBC has engaged with the Local Nature Partnership through direct correspondence and meetings and through the CSWAPO group (see above).
- 3.63 A DtC meeting was held on 15 January 2026 to highlight the planned consultation on the proposed Submission Plan (subject to the decision of Council), and highlight key emerging policies and their relationship with the emerging Local Nature Recovery Strategy.

The Civil Aviation Authority

- 3.64 It is not considered that there are strategic planning matters relevant to the Civil Aviation Authority within Rugby Borough. However, the Authority was invited to make representations to the Regulation 18 consultations, and none were forthcoming.

Homes England

- 3.65 Homes England was invited to make representations to the Regulation 18 consultations, but none were forthcoming.
- 3.66 Homes England holds land interests on the allocation at South West Rugby, which is already allocated in the adopted local plan, and carried forward into the Submission Plan.

4. STRATEGIC ISSUES

4.1 This section sets out how Duty to Cooperate partners are addressing the strategic matters to which the Duty applies.

GROWTH NEEDS AND LAND SUPPLY

4.2 CSWAPO partners have worked together to commission and agree evidence underpinning housing and economic development needs. This includes notably the Housing and Economic Development Needs Assessment (HEDNA) (2022), the WMSESS – HEDNA Alignment Paper (2024) and the WMSESS -HEDNA Alignment Paper Addendum (2025).

4.3 The HEDNA determined that the appropriate Housing Market Area (HMA) and Functional Economic Area (FEMA) includes Coventry, Nuneaton and Bedworth, Rugby, North Warwickshire, Stratford on Avon, and Warwick. This reflects the approach in previous plan-making in these local authority areas, and aligns with membership of CSWAPO (see section 3 above).

Housing

4.4 As set out in the Development Needs Topic Paper, and with reference to paragraph 62 of the NPPF, Rugby's housing need is calculated in accordance with the standard method set out in planning practice guidance.

4.5 The Memorandum of Understanding (MoU) (see appendix 3) between CSWAPO member authorities sets out agreement that plans being prepared under the 2024 NPPF will utilise the standard method outcomes (which supersede the needs set out in the HEDNA).

4.6 CSWAPO authorities are all at different stages of plan-making. At the time of writing, there is no evidenced unmet housing need within Coventry City nor other Warwickshire Authority areas.

Gypsy and Traveller Accommodation

4.7 In March 2025, Rugby Borough Council (RBC) published a Gypsy and Traveller Accommodation Needs Assessment which identified a need for 94 pitches in a plan period between 2024 and 2042. A supply sufficient to accommodate 68 pitches has been identified in the proposed submission plan.

4.8 In April 2025, RBC wrote to all of its neighbouring authorities (with the exception of Coventry City to which a letter was sent in February 2025) in Warwickshire, Leicestershire and Northamptonshire to request assistance in meeting identified unmet need for gypsy and traveller accommodation (at the time assessed to be 47 pitches and then subsequently revised). The letters sent to each neighbouring authority are included in appendix 4.

4.9 A summary of the responses is set out in the table below, and copies of correspondence attached in appendix 5 (with the exception of that included in consultation representations or in Statements of Common Ground). As set out in section 3 of this statement, gypsy and traveller accommodation is an ongoing priority topic amongst the CSWAPO members.

Table 2 – summary of LPA responses

Neighbouring Authority	Formal response received?	Summary of outcome
Coventry City Council	Yes	No flexibility to accommodate Rugby's unmet need. The Statement of Common Ground agreed in respect of Coventry City Council's emerging local

Neighbouring Authority	Formal response received?	Summary of outcome
		plan in October 2025 refers to this issue. It notes agreement to revisit this matter at such time as the evidence base is updated in future.
Warwick District Council (WDC)	Yes	WDC and SDC are working on a joint local plan for South Warwickshire, and as such whilst separately signed, the written responses are identical. They note significant challenge in meeting the identified need in South Warwickshire and don't see a way to assist at the time of writing.
Stratford-on-Avon District Council (SDC)	Yes	
Nuneaton and Bedworth Borough Council	Yes	Unable to accommodate unmet need arising elsewhere. Local plan has been through examination.
Blaby District Council	Yes	Blaby was assessing its options to address its own evidenced need at the time of its response in April 2025. The response suggests Blaby would be unable to assist but would revisit once its assessment was complete. During at DtC meeting in June 2025, Blaby indicated that there was potential for unmet need within the district.
Harborough District Council	Yes	No capacity to meet unmet need.
Hinckley and Bosworth Borough Council	Yes (within Preferred Option consultation response)	The consultation response stated that HBBC is working on its own evidence base, with own need to be quantified. It noted that an updated position may be available later in 2025, though enquires to follow this up have concluded that as at January 2026 the evidence base remains to be completed.
West Northamptonshire Council	No	A DtC meeting was held in May where this matter was discussed. WNC was working toward a Regulation 18 plan at that time. No further indication of assistance received.

4.10 At the request of Rugby Borough Council, in recognition of an identified unmet need, gypsy and traveller accommodation was included in the revised list of strategic priorities for the CSWAPO authorities at its monthly meeting (see section 3 of this report in relation to CSWAPO). The purpose is to ensure that this cross-boundary matter remains high on the agenda. In addition, a meeting was held with the Warwickshire local planning authorities and relevant officers from Warwickshire County Council in October 2025, with further meetings envisaged.

Employment

4.11 The HEDNA (2022) was the starting point for assessing employment need. However, work was also progressing across the wider West Midlands region in terms of assessing strategic site needs. Strategic sites have some varying requirements compared with local employment provision. The West Midlands Strategic Employment Sites Study (WMSESS) was finalised in September 2024. This was the result of a partnership of authorities across the West Midlands Combined Authority area, Staffordshire, Shropshire, north Worcestershire and Warwickshire. CSWAPO authorities became engaged with this as a result of this strategic employment work and RBC was part of the steering group for the study.

4.12 The WMSESS sets out 'opportunity areas' for further exploration. 'Opportunity Area 7 –

M6/A45/A46/M45 Coventry and Rugby' predominantly falls across Coventry City and central (east-west) band through Rugby Borough.

- 4.13 As the HEDNA was finalised two years prior to the completion of the WMSESS, CSWAPO authorities in the FEMA jointly commissioned an 'Alignment Paper' (2024) to ensure consistency and provide up to date information to inform plan-making. In addition to explaining how the HEDNA and WMSESS align on strategic employment matters, the 'Alignment Paper' also provides updated figures for local employment need. An addendum was produced in 2025.
- 4.14 The Development Needs Topic Paper sets out Rugby's position with regard to employment land.
- 4.15 Through its local plan review, Coventry City Council has identified an unmet employment land need. This too is discussed in the Development Needs Topic Paper, and the matter noted in the agreed October 2025 Statement of Common Ground (SoCG) with Coventry City in respect of its local plan. It is envisaged that a new SoCG will be produced to update the position for submission with Rugby Borough's local plan.

SITE ASSESSMENT METHODOLOGY

- 4.16 In line with the recommendations of the Planning Practice Guidance (PPG) (Paragraph 007 Reference 3-007-20190722) a high-level methodology for undertaking Housing and Employment Site Assessments was agreed between the councils that make up the Coventry and Warwickshire Housing Market Area (the HMA) and the Functional Economic Market Area (FEMA). The councils involved, and signed up to the methodology are: Rugby Borough Council, Nuneaton and Bedworth Borough Council, Coventry City Council, Warwick District Council, Stratford on Avon District Council and North Warwickshire Borough Council.
- 4.17 A Coventry and Warwickshire Sub-Regional Joint Method Statement was produced in February 2022 entitled the 'Housing and Economic Land Availability Assessment – Methodology' and adopted by each council. This established a common methodology for each council to follow, with broad principles to inform each council's individual assessments. A copy of the Sub-regional joint methodology and Call for Sites proforma can be found in [here](#).
- 4.18 This methodology informed the Call for Sites proforma used in the Call for Sites undertaken as part of the local plan process. It also informed the assessment of sites. Further information is included in the [Housing and Economic Land Availability Assessment \(HELAA\) 2025](#).

CRITICAL INFRASTRUCTURE

- 4.19 In terms of critical infrastructure, the key strategic matters are identified as energy, health and education (noting that other infrastructure matters including green and blue infrastructure and transport are addressed separately, and covered by different workstreams amongst the strategic matters identified by CSWAPO (see section 3)).

Energy

- 4.20 Energy generation and network distribution strategies are consulted upon by the Energy Companies and Distribution Network Companies. Presentations and discussions have been undertaken with the CSWAPO group to raise awareness of consultations and encourage engagement. This has also served to ensure that companies are aware of strategic growth plans.

4.21 National Grid Energy Distribution responded to Regulation 18 consultation, and noted no site-specific concerns at that stage.

4.22 National Grid Electricity Transmission also responded to the Regulation 18 consultation.

Health

4.23 Health matters have been discussed with the Coventry and Warwickshire ICB and the Leicestershire ICB as set out in section 3 of the statement.

Education

4.24 Rugby Borough Council (RBC) commissioned independent education modelling to support the development of the local plan, as set out in the Education Topic Paper within the evidence base. Warwickshire County Council as the Local Education Authority (LEA) provided data necessary for this independent modelling, as set out in section 2 of the aforementioned topic paper, and referenced further throughout. The output of this work is the model only, with no recommendations about how RBC or the LEA should respond.

4.25 Alongside this, advice has been supplied by Warwickshire County Council as LEA. This advice is also summarised in WCC's Regulation 18 consultation response. Regular meetings with the LEA have been held including on-site meetings in respect of the proposed secondary school site at St Thomas Cross (at Regulation 18 stage) and at Rugby Free Primary School. A statement of common ground will be prepared.

TRANSPORT

Highways

4.26 The Council has liaised with key transport infrastructure providers throughout the plan making process, including Warwickshire County Council Highways and National Highways as set out in the previous section.

4.27 Through collaborative working with Warwickshire County Council Highways a Strategic Transport Assessment has been undertaken, and initial high-level input from highways colleagues assisted in the site selection process for the Preferred Options consultation.

4.28 RBC also engages with National Highways through the A5 Partnership (officers and members groups). This also involves neighbouring authorities and highway authorities, including Leicestershire County Council.

Rail

4.29 Land has been safeguarded within the plan for a new Nuneaton Parkway Station. This is being promoted by Warwickshire County Council (WCC), with much detail included in WCC's representation to the Preferred Option Consultation. As noted within the supporting text for policy I5, the Nuneaton Parkway Station has been identified as a priority project by Midlands Connect and identified within the West Midlands Rail Executive Rail Investment Strategy for delivery between 2031 and 2040.

4.30 In addition, the plan identifies land for the provision of a Rugby Parkway Station at Houlton. This station is included in WCC's adopted Local Transport Plan (2019-2034). A planning application has already

been submitted for this station.

- 4.31 Evidence to support the safeguarding of land for both stations has been provided by WCC and is included among the evidence base documents.

Rapid Transit

- 4.32 Officers have engaged in early stage option consideration for mass rapid transit to the Coventry and Warwickshire Investment Zone, with representatives of Coventry City Council, Warwick District Council and Transport for West Midlands. The Investment Zone is located adjacent to Rugby Borough's administrative boundary within Coventry City and Warwick District. A site visit, workshop and meetings are highlighted within the DtC log in appendix 2.
- 4.33 Discussions have also taken place with Coventry City Council about the principle of extending the first proposed Very Light Rail (VLR) line between Coventry City Centre and University Hospital Coventry and Warwickshire to Ansty Park via the proposed Walsgrave Hill allocation. Those discussions form the basis of the route safeguarding requirements for VLR within the proposed submission local plan allocation policy for that site.

FLOOD RISK AND WATER RESOURCES

- 4.34 The 'water' topic group set up by CSWAPO (see section 3 of this report) worked together to commission the Strategic Flood Risk Assessment (SFRA) and the Water Cycle Study. These (stage 1) documents have been published as part of the evidence base for the local plan.
- 4.35 This topic group included the Lead Local Flood Authorities across Coventry and Warwickshire (Coventry City Council and Warwickshire County Council), and actively engaged with Severn Trent Water and the Environment Agency.
- 4.36 A Stage 2 Water Cycle Study has been prepared as part of the evidence to support the proposed Submission Plan, which notes inputs from Severn Trent Water and the Environment Agency, as well as neighbouring authorities.
- 4.37 A Stage 2 Strategic Flood Risk Assessment and sequential test has also been prepared.

NATURAL ENVIRONMENT

- 4.38 The 'natural environment' topic group set up by CSWAPO (see section 3 of this report) has had oversight of the update of the Strategic Green Infrastructure Strategy, completed in 2024. This has informed the preparation of the local plan.
- 4.39 As detailed above RBC is part of the Natural Capital Assessment Partnership (NCAP) and is a consultee on the Local Nature Recovery Strategy. A DtC meeting was held on 15 January 2026 with the Local Nature Partnership to highlight the forthcoming proposed Submission Plan consultation and key policies.
- 4.40 RBC works closely with WCC on implementing biodiversity net gain and has a service level agreement covering ecology.

5 SUMMARY OF DUTY TO COOPERATE OUTCOMES

DIALOGUE AND ENGAGEMENT

5.1 RBC has undertaken a number of Duty to Cooperate discussions and exercises throughout the preparation of the Rugby Borough Local Plan as detailed in this report and the log included in appendix 2. These have shaped the strategy and policies of the plan as published. Where considered appropriate, Statements of Common Ground (SoCG) will be prepared.

JOINTLY PRODUCED EVIDENCE

5.2 A number of joint evidence base studies have been produced in the period between 2022 and 2025 which have supported the preparation of the Rugby Local Plan and local plans in neighbouring authority areas. This is a further demonstration of ongoing cooperation.

5.3 Joint evidence documents include:

Development Needs

- Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA), 2022
- West Midlands Strategic Employment Sites Study, 2024
- Coventry and Warwickshire HEDNA-WMSESS Alignment Paper, 2024
- HEDNA-WMSESS Alignment Paper Addendum, 2025

Environment

- Coventry and Warwickshire sub-regional Water Cycle Study, 2024
- Coventry and Warwickshire Strategic Flood Risk Assessment (SFRA), 2024
- Coventry, Solihull and Warwickshire Strategic Green Infrastructure Study, 2024

Transport

- Strategic Transport Assessment 2025


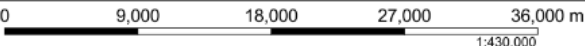
CONCLUSION

5.4 In conclusion, RBC considers that it has fully met its responsibilities in regard to the Duty to Cooperate. Discussions will continue, and updates provided where necessary.

5 APPENDICIES

APPENDIX 1 – MAP OF BOROUGH IN CONTEXT



Rugby Borough & Neighbouring Authorities			Date: 15/01/2026	Scale: 1:430,000 (when printed @A4)	
			Drawn By: Jonathan Deller	Rugby Borough Council Town Hall, Evreux Way CV21 2RR	
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APPENDIX 2 – DUTY TO COOPERATE LOG

Date	Duty to cooperate partner	Activity	Matters discussed
10-Jul-23	JMOG	Regular meeting	Joint monitoring
12-Jul-23	CSWAPO	Monthly meeting	MoU in context of NBBC. Coventry upcoming Reg.18 consultation. Joint monitoring. Update on WMSESS - specifically asking for more engagement with wider client group.
09-Aug-23	CSWAPO	Monthly meeting	Strategic priorities, critical infrastructure, green infrastructure strategy, MoU progress (NBBC), BNG, joint monitoring. Followed by an update from Icenl on WMSESS
13-Sep-23	CSWAPO	Monthly meeting	Exploration of County-wide monitoring for BNG. MoU discussed with reference to NBBC local plan.
27-Sep-23	Nuneaton and Bedworth Borough Council	Briefing for DtC partners on Nuneaton and Bedworth Local Plan Regulation 19	N&B outlined their plan update and then held a Q&A session
11-Oct-23	CSWAPO	Monthly meeting	Strategic priorities, critical infrastructure, natural environment workstream, CSWAPO minutes and ToR, MoU progress.
08-Nov-23	CSWAPO	Monthly meeting	Representatives from Public Practice gave a talk on roles and skills. Joint Water Cycle Study nearing completion, transport theme meeting to be set up to address cross boundary issues.
24-Nov-23	A5 Partnership (Members)	Regular meeting	
13-Dec-23	CSWAPO	Monthly meeting	Presentation from Active Travel England. Updates on workstreams for joint strategic priorities.
10-Jan-24	CSWAPO	Monthly meeting	NPPF updates discussed alongside CSWAPO impacts and impacts on each local plan position. Joint BNG monitoring further discussed.

Date	Duty to cooperate partner	Activity	Matters discussed
08 Feb 24	National Gas	Meeting	
14-Feb-24	CSWAPO	Monthly meeting	South Leicestershire Joint Transport modelling exploring spatial options. Grid sensitivity and capacity discussed. New data and HEDNA impacts considered.
22-Feb-24	NCAP Management Group		Data collection and task and finish groups
13-Mar-24	CSWAPO	Monthly meeting	PAS representative attended to discuss DtC. NBBC plan submitted with SoCGs. MoU work ongoing. WMSESS discussed.
19-Mar-24	A5 Steering Group	Regular meeting	
10-Apr-24	CSWAPO	Monthly meeting	Responses to the NPPF consultation and CCCs representation on the Brownfield consultation. Lengthy discussion on WMSESS.
25-Apr-24	NCAP Steering Group	Regular meeting	
30-Apr-24	Harborough	Briefing for DtC partners on Harborough's local plan review post Regulation 18 consultation	Timetable for Harborough local plan review, and scope and schedule of DtC engagements. Summary of key cross boundary matters.
30-Apr-24	Coventry	DtC meeting	Housing numbers
08-May-24	CSWAPO	Monthly meeting	Joint workstream updates, lengthy discussion on WMSESS
22 May 24	Local Education Authority	Data meeting	Data needed for modelling work.
04-Jun-24	CWAPO - Environment group	Topic group meeting - WCC ecologists, and representatives from LPAs in Coventry and Warwickshire	Updated Green Infrastructure study

Date	Duty to cooperate partner	Activity	Matters discussed
07-Jun-24	Coventry and Warwickshire Authorities	DtC - HEDNA discussion	Discussion of Coventry's development need and issues arising. Discussion supported by Icen, the consultancy that has produced/is producing various elements of the need evidence base. WMSESS also discussed and how it interacts with employment needs identified in the HEDNA.
12-Jun-24	CSWAPO	Monthly meeting	Data for joint monitoring, MoU/SoCG on Coventry progress, WMSESS update, and updates on local plans across the sub-region.
12-Jun-24	HEDNA discussion - Coventry and Warwickshire Authorities	High level discussion about housing and employment land supply	High level discussion about housing and employment land supply. Discussion of ambitions around MoU/SoCG
10-Jul-24	CSWAPO	Monthly meeting	Updates on local plan processes, MoU/SoCG, and joint workstreams
12-Jul-24	A5 Transport Partnership (Member) group	Regular meeting	
16-Jul-24	A5 Partnership Meeting	Regular meeting	
23-Jul-24	Local Estates Forum workshop (NHS)	DtC	Local plan update and forecasts. Plans for NHS estates across Rugby, including St Cross Hospital
14-Aug-24	CSWAPO	Monthly meeting	NPPF consultation, Water Cycle Study update, update regarding transport workstream, MoU progress and JMoG update.
05-Sept-24	Coventry DtC meeting	DtC meeting arranged by Coventry City Council	DtC matters in relation to Coventry's local plan.
09-Sept-24	JMOG	Regular meeting	Joint monitoring updates
11-Sept-24	CSWAPO	Monthly meeting	Joint workstream update, draft Coventry MoU to follow publication of HEDNA & WMSESS Alignment paper, Leicestershire strategic B8 work, local plan updates.

Date	Duty to cooperate partner	Activity	Matters discussed
24-Sept-24	Harborough District DtC meeting - strategic B8	DtC meeting arranged by Harborough DC	A meeting between officers of Harborough District and Rugby Borough to discuss local plan progress, and specifically approach to strategic B8 and proposed allocations.
09-Sept-24	CSWAPO	Monthly meeting	Update re Strategic Green Infrastructure Study, minor update regarding energy and solar farms. Memorandum of Understanding, and member organisation updates.
10-Sept-24	Harborough District DtC meeting	Meeting of Harborough's DtC bodies	Overview of Harborough's emerging spatial strategy, site allocations, evidence base, and forthcoming engagement schedule.
11-Sept-24	A5 Transport Partnership (Officer) group	Regular meeting	
30-Sept-24	Integrated Care Bord and NHS Commissioning	Local Estates Forum (NHS)	Local health estates
06-Sept-24	National Highways Meeting	NH and RBC Statement of Common Ground discussion, Walsgrave Junction	Statement of Common Ground and next steps
13-Nov-24	CSWAPO	Monthly meeting	Presentation on planning Reform and the re-emergence of strategic planning and how it might work for the West Midlands region, local plan updates, joint workstream updates, employment need.
21-Nov-24	A5 Partnership (Members) group	Regular meeting	
25-Nov-24	NCAP Steering Group		
26-Nov-24	Coventry DtC meeting	DtC meeting arranged by Coventry City Council	Draft Memorandum of Understanding

Date	Duty to cooperate partner	Activity	Matters discussed
22-Dec-24	Local Estates Forum (NHS)	Regular meeting	Local health estates
11-Dec-24	CSWAPO	Monthly meeting	West Midlands Strategic Planning questionnaire (high level), plan to reevaluate the function and ongoing use of topic theme sub-groups (agreed to discuss at AGM in Feb 25), meeting strategic and local employment need, local plan updates
08-Jan-25	CSWAPO	Monthly meeting	Devolution/strategic planning, joint workstreams, local plan updates, AGM next meeting
08-Jan-25	Coventry City Council and other Warwickshire authorities	DtC meeting arranged by Coventry City Council	Joint MoU/SoCG content
27-Jan-25	Warwickshire County Council (Education)	Exploring how we could deliver a new secondary school in Rugby	Exploring potential options
03-Feb-25	Coventry and Warwickshire ICB	Local Estates Forum	Local health estate matters
12-Feb-25	CSWAPO	Monthly meeting	Consensus that workstream theme groups have reached the end of usefulness and new shared priorities discussed. Nature Recovery Strategies. MoU. Employment sites progress.
06-Mar-25	Warwickshire County Council (Education)	Site visit to potential site for a new secondary school at Newton Manor Lane	Explored the site opportunities and constraints
12-Mar-25	CSWAPO	Monthly meeting	Agree to update standing items on agenda to reflect new priorities agreed in February. Memorandum of Understanding
14-Mar-25	Warwickshire County Council	Discuss potential site allocation at	Feasibility of new secondary school

Date	Duty to cooperate partner	Activity	Matters discussed
	(Education)	Newton Manor Lane for a secondary school	
27-Mar-25	Warwickshire County Council (Education)	Site visit with architect	Feasibility of new secondary school at St Thomas Cross
31-Mar-25	JMOG	Regular joint monitoring meeting	Joint monitoring updates
02-Apr-25	School headteacher	Mtg at the Revel School	Local school places
07-Apr-25	NHS Coventry and Warwickshire ICB	Local Estates Forum	Local health estate matters
09-Apr-25	CSWAPO	Monthly meeting	County (Warwickshire) wide gypsy and traveller needs update from WCC officer Jeff May. Agreed further meetings required between authorities across the county. Nature conservation including Nature Recovery Strategies, BNG, Natural Capital Investment Strategy - with input from specialist officers from WCC. Updates on priority topics.
10-Apr-25	Coventry City Council, Warwick District Council, Stratford on Avon District Council, Nuneaton and Bedworth Borough Council, North Warwickshire Borough Council, West Northamptonshire Council, Blaby District Council, Harborough District Council and Hinckley and Bosworth Borough Council	Issued letters requesting assistance with Rugby Borough's identified unmet need for Gypsy and Traveller pitches.	Letter set out the position regarding unmet need and requested assistance.

Date	Duty to cooperate partner	Activity	Matters discussed
15-Apr-25	Coventry and Warwickshire ICB	DtC meeting	Preferred Opinions (Reg 18) local plan and how primary healthcare might be addressed.
08-May-25	West Northamptonshire Council	DtC meeting	General local plan update, Rugby's unmet Gypsy and Traveller pitch need, omission site at Lodge Farm, and sites close to the shared administrative boundary.
14-May-25	CSWAPO	Monthly meeting	Updates on priority issues, MoU, local plan updates. Hinckley and Bosworth attendance moving forward discussed - suggest not to attend CSWAPO routinely, but invited when relevant discussion.
15-May-25	Warwickshire County Council Highways	Strategic Transport Assessment	Scope of the STA
16-May-25	Coventry DtC meeting	Discuss the SoCG/MoU	Discuss the SoCG/MoU
25-May-25	DtC meeting with West Northamptonshire	DtC meeting - Rugby local plan	General plan position, gypsy and traveller pitch unmet need, local plan (Reg 18) omission site (Lodge Farm) with associated cross boundary issues
02-Jun-25	Leicestershire and Rutland ICB	DtC meeting	Preferred Options (Reg 18) local plan and how primary healthcare might be addressed - particular reference to Wolvey which fall under this ICB (rather than Coventry and Warwickshire)
02-Jun-25	Coventry and Warwickshire ICB	Local Estates Forum (NHS)	Local health estates
05-Jun-25	WCC (education) and stakeholders	Mtg at Rugby Free Primary School - Coton Park	Local requirements
11-Jun-25	CSWAPO	Monthly meeting	WMCA net zero/climate change strategy update. CSWAPO budget, Minerals and Waste data. Local Government Reorganisation and planning reforms. Priority topic updates. Hinckley and Bosworth agreement with proposed attendance as noted in minutes of 14 May 2025 noted.

Date	Duty to cooperate partner	Activity	Matters discussed
24-Jun-25	Blaby DC	DtC workshop set up by Blaby DC	Outline of local plan timetable, moving to Regulation 19 consultation in November 2025. High level outline of the spatial strategy, but sites not identified. Highways and strategic B8 provision DtC matters with Rugby, also unmet gypsy and traveller needs likely.
09-Jul-25	CSWAPO	Monthly meeting	Coventry Highways Transport Modelling update. Government consultations. MoU/SoCG updates, including letters sent by RBC to all neighbouring authorities regard Gypsy and Traveller pitch shortfall.
10-Jul-25	NCAP Management Meeting	Regular meeting	
17-Jul-25	Coventry City Council, Warwick District Council, Transport for West Midlands	Coventry and Warwickshire IZ Rapid transit visioning	Rapid transit visioning session
18-Jul-25	A5 Transport Partnership (Members)	Regular meeting	
31-Jul-25	Transport for West Midlands, Coventry City Council, Warwick District Council	Site visit	Exploring Mass Rapid Transit from Coventry City to the Investment Zone (which is adjacent to Rugby's administrative boundary).
13-Aug-25	CSWAPO	Monthly meeting	Progress of MoU and SoCGs with CCC. Actions for further work on local and strategic employment need. Agree to set up a meeting with partners regarding Gypsy and Traveller provision.
14-Aug-25	Transport for West Midlands, Coventry City Council, Warwick District Council	Workshop	Exploring Mass Rapid Transit from Coventry City to the Investment Zone (which is adjacent to Rugby's administrative boundary).
10-Sept-25	CSWAPO	Monthly meeting	CCC submitted its local plan. Partially signed MoU submitted. SoCG still progressing. Gypsy and Traveller sites meeting (agreed 13.08.25) pending. Priority

Date	Duty to cooperate partner	Activity	Matters discussed
			topics, and local plan updates.
17-Sept-25	Coventry and Warwickshire ICB	Meeting to discuss Long Lawford primary care provision options	Feasibility of providing a new GP surgery in Long Lawford.
17-Sept-25	Warwickshire County Council (LEA)	On site meeting - Rugby Free Primary School	
19-Sept-25	Transport for West Midlands, Coventry City Council, Warwick District Council	Consideration of initial route options for the transit route between Coventry City Centre and the Investment Zone.	Consideration of initial route options for the transit route between Coventry City Centre and the Investment Zone.
25-Sept-25	Warwickshire County Council	Opportunities for collaboration	This includes opportunities across planning in the widest sense, but included matters relevant to the recently received Preferred Option consultation response from WCC.
06-Oct-25	Coventry and Warwickshire ICB	Local Estates Forum (NHS)	Local health estates matters
08-Oct-25	CSWAPO	Monthly meeting	Updates on MoU signing and SoCG with CCC. Updates on climate and transport priority topics planned for November. Icen work re employment ongoing, and Gypsy and Traveller meeting to follow session.
08-Oct-25	Warwickshire Authorities	Gypsy and Traveller Accommodation meeting	Each LPA gave an update on their current position regarding Gypsy and Traveller Accommodation demand and supply. Warwickshire County Council indicated a shift in position regarding site management, and potential for sites to be managed by the county council. Actions agreed and further meeting to be scheduled in due course.
22-Oct-25	Coventry and Warwickshire ICB	DtC meeting	Delivery of primary care to support the local plan and a means of delivering the surgery

Date	Duty to cooperate partner	Activity	Matters discussed
			at South West Rugby.
12-Nov-25	CSWAPO	Monthly meeting	WCC officers gave an overview of the Local Transport Plan and the approach to area strategies. Local energy planning update also presented. WCC sign-off of MoU. Coventry work update re employment shortfall. Local plan updates.
04-Dec-25	West Northamptonshire Council	Call regarding the Rainsbrook Valley	WNC's Reg 18 representation. Landscape evidence base status in West Northants and direction of travel on amendments to Rugby Borough's LP.
10-Dec-25	CSWAPO	Monthly meeting	WCC sign-off of MoU awaited. Rugby's emerging position regarding Coventry's unmet employment need. Local plan updates.
14-Jan-26	CSWAPO	Monthly meeting	Presentation from the West Midlands Combined Authority on Spatial Development Strategies, update on signing of the MoU, LPA updates.
15-Jan-26	Coventry Warwickshire and Solihull Local Nature Partnership	DtC meeting	Emerging plan and evidence base.

APPENDIX 3 – MEMORANDUM OF UNDERSTANDING

1. INTRODUCTION

- 1.1 This Memorandum of Understanding (MoU) has been prepared in accordance with national guidance¹ 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

¹ 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

Authority	HEDNA Housing Need (dpa)
Coventry	1455
North Warwickshire	119

Nuneaton and Bedworth ²	409
Rugby	735
Stratford-on-Avon	868
Warwick	811
Total	4397

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

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

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.

² 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.

³ 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 ⁴	41	52 ⁵	-11
Coventry	105	60	45
Stratford	144	56	88
Warwick	83	37	46
Total	492	244	248

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
Total	572	244	328

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
Total	670	244	426

- 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:

⁴ 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.

⁵ 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 HEDNA⁶, 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 2023⁷.
- 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 – Iceni 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

⁶ See summary section 5, paragraph 5.159 to 5.161 of the HEDNA.

⁷ 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:

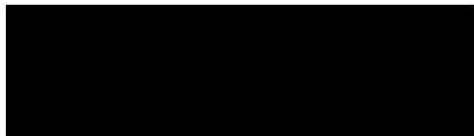
Signed on behalf of Nuneaton & Bedworth Borough Council:

Cllr Tony Venson



Date: 26.06.2025

Signed on behalf of Rugby Borough Council:

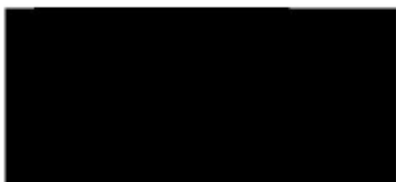


Date: 28 July 2025

Authorised Officer: KAREN HILLMAN

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:

APPENDIX 4 – DUTY TO COOPERATE LETTER REGARDING GYPSY AND TRAVELLER ACCOMMODATION



By email only to:
Clare.Eggington@coventry.gov.uk
Planning Policy Manager
Coventry City Council

Please ask for	Neil Holly
Direct Line	07919 166 173
E-mail Address	neil.holly@rugby.gov.uk
Date	5 February 2025

Dear Clare

Duty to cooperate – employment land and gypsy and traveller pitches

As you know our respective authorities remain under a legal duty in s33A of the Planning and Compulsory Purchase Act 2004 to cooperate in maximising the effectiveness of the preparation of our development plans in relation to strategic matters which have cross-boundary impacts.

I think we have a good framework for joint working through CSWAPO. However, there are two strategic matters where 'unmet need' has arisen on which there may be an opportunity for us to make further progress:

- (1) I note from your Reg 19 local plan, and as you have previously advised, Coventry City Council has 45ha of employment land as part of its projected need in the HEDNA-WMSESS Alignment Paper that it is unable to meet within the city's boundaries.
- (2) Rugby Borough Council's latest Gypsy and Traveller Accommodation Assessment (2025, unpublished) identifies a need for 95 pitches 2024-2042. We have identified potential site allocations to deliver circa 48 of those pitches, but a shortfall remains. Of the 102 existing occupied pitches in Rugby Borough only 5 are on sites distant from the Coventry city boundary. The remainder are in locations which are within 3km of Coventry's boundary. There is clearly an economic and functional link with Coventry which influences this concentration of pitches in rural areas adjoining the city.

Considering the above, I think that there may be an opportunity for us to mutually assist each other in addressing cross boundary issues. I'd be grateful therefore if you could let me know whether in principle Coventry City Council would be able to accommodate unmet need for Gypsy and Traveller pitches from Rugby Borough (and if so, how many pitches) in exchange for our contributing to meeting Coventry's unmet employment land need.

I'd be grateful if you could get back to me on this ASAP as we are at a critical point in preparing our draft plan. We have until 20 February to make last minute amendments to that draft prior to its publication.

Rugby Borough Council, Town Hall, Evreux Way, Rugby CV21 2RR
Telephone: (01788) 533533 Email: contactcentre@rugby.gov.uk

#RightForRugby

If there is potentially a framework for an exchange as proposed above, we can then advance this through a bilateral statement of common ground in time for your local plan examination.

Please note that the contents of this letter have been read and endorsed by my chief officer and Rugby Borough Council's political administration.

I look forward to hearing from you.



By email only to:
Blaby District Council
Planning.policy@blaby.gov.uk

Please ask for	Hayley Smith/Neil Holly
Direct Line	07919 166 173
E-mail Address	localplan@rugby.gov.uk
Date	10 April 2025

Dear Planning Policy Team

Duty to cooperate – gypsy and traveller pitches

As you know our respective authorities remain under a legal duty in s33A of the Planning and Compulsory Purchase Act 2004 to cooperate in maximising the effectiveness of the preparation of our development plans in relation to strategic matters which have cross-boundary impacts.

Rugby Borough Council's latest Gypsy and Traveller Accommodation Assessment (2025, unpublished) identifies a need for 95 pitches 2024-2042. We have identified potential site allocations to deliver circa 48 of those pitches, as set out in the ongoing [Preferred Option consultation](#), but a shortfall remains.

I therefore write to you to ask if Blaby District would be able to accommodate any unmet need for Gypsy and Traveller pitches from Rugby Borough, and if so, how many pitches.

Yours sincerely

Hayley Smith
Principal Planning Officer

Rugby Borough Council, Town Hall, Evreux Way, Rugby CV21 2RR
Telephone: (01788) 533533 Email: contactcentre@rugby.gov.uk

#RightForRugby



By email only to:
Harborough District Council
planningpolicy@harborough.gov.uk

Please ask for	Hayley Smith/Neil Holly
Direct Line	07919 166 173
E-mail Address	localplan@rugby.gov.uk
Date	10 April 2025

Dear Planning Policy Team

Duty to cooperate – gypsy and traveller pitches

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Rugby Borough Council's latest Gypsy and Traveller Accommodation Assessment (2025, unpublished) identifies a need for 95 pitches 2024-2042. We have identified potential site allocations to deliver circa 48 of those pitches, as set out in the ongoing [Preferred Option consultation](#), but a shortfall remains.

I therefore write to you to ask if Harborough District would be able to accommodate any unmet need for Gypsy and Traveller pitches from Rugby Borough, and if so, how many pitches.

Yours sincerely

Hayley Smith
Principal Planning Officer

Rugby Borough Council, Town Hall, Evreux Way, Rugby CV21 2RR
Telephone: (01788) 533533 Email: contactcentre@rugby.gov.uk

#RightForRugby



By email only to:
Hinckley and Bosworth Borough Council
planningpolicy@hinckley-bosworth.gov.uk

Please ask for	Hayley Smith/Neil Holly
Direct Line	07919 166 173
E-mail Address	localplan@rugby.gov.uk
Date	10 April 2025

Dear Planning Policy Team

Duty to cooperate – gypsy and traveller pitches

As you know our respective authorities remain under a legal duty in s33A of the Planning and Compulsory Purchase Act 2004 to cooperate in maximising the effectiveness of the preparation of our development plans in relation to strategic matters which have cross-boundary impacts.

Rugby Borough Council's latest Gypsy and Traveller Accommodation Assessment (2025, unpublished) identifies a need for 95 pitches 2024-2042. We have identified potential site allocations to deliver circa 48 of those pitches, as set out in the ongoing [Preferred Option consultation](#), but a shortfall remains.

I therefore write to you to ask if Hinckley and Bosworth would be able to accommodate any unmet need for Gypsy and Traveller pitches from Rugby Borough, and if so, how many pitches.

Yours sincerely

Hayley Smith
Principal Planning Officer

Rugby Borough Council, Town Hall, Evreux Way, Rugby CV21 2RR
Telephone: (01788) 533533 Email: contactcentre@rugby.gov.uk

#RightForRugby



By email only to:
Nuneaton and Bedworth Borough Council
Planning.policy@nuneatonandbedworth.gov.uk

Please ask for	Hayley Smith/Neil Holly
Direct Line	07919 166 173
E-mail Address	localplan@rugby.gov.uk
Date	10 April 2025

Dear Planning Policy Team

Duty to cooperate – gypsy and traveller pitches

As you know our respective authorities remain under a legal duty in s33A of the Planning and Compulsory Purchase Act 2004 to cooperate in maximising the effectiveness of the preparation of our development plans in relation to strategic matters which have cross-boundary impacts.

Rugby Borough Council's latest Gypsy and Traveller Accommodation Assessment (2025, unpublished) identifies a need for 95 pitches 2024-2042. We have identified potential site allocations to deliver circa 48 of those pitches, as set out in the ongoing [Preferred Option consultation](#), but a shortfall remains.

I therefore write to you to ask if Nuneaton and Bedworth Borough would be able to accommodate any unmet need for Gypsy and Traveller pitches from Rugby Borough, and if so, how many pitches.

Yours sincerely

Hayley Smith
Principal Planning Officer

Rugby Borough Council, Town Hall, Evreux Way, Rugby CV21 2RR
Telephone: (01788) 533533 Email: contactcentre@rugby.gov.uk

#RightForRugby



By email only to:
Stratford on Avon District Council
johncareford@stratford-dc.gov.uk
planning.policy@stratford-dc.gov.uk

Please ask for	Hayley Smith/Neil Holly
Direct Line	07919 166 173
E-mail Address	localplan@rugby.gov.uk
Date	10 April 2025

Dear John

Duty to cooperate – gypsy and traveller pitches

As you know our respective authorities remain under a legal duty in s33A of the Planning and Compulsory Purchase Act 2004 to cooperate in maximising the effectiveness of the preparation of our development plans in relation to strategic matters which have cross-boundary impacts.

Rugby Borough Council's latest Gypsy and Traveller Accommodation Assessment (2025, unpublished) identifies a need for 95 pitches 2024-2042. We have identified potential site allocations to deliver circa 48 of those pitches, as set out in the ongoing [Preferred Option consultation](#), but a shortfall remains.

I therefore write to you to ask if Stratford on Avon District would be able to accommodate any unmet need for Gypsy and Traveller pitches from Rugby Borough, and if so, how many pitches.

Yours sincerely

Hayley Smith
Principal Planning Officer

Rugby Borough Council, Town Hall, Evreux Way, Rugby CV21 2RR
Telephone: (01788) 533533 Email: contactcentre@rugby.gov.uk

#RightForRugby



By email only to:
Warwick District Council
Andrew.cornfoot@warwickdc.gov.uk
planningpolicy@warwickdc.gov.uk

Please ask for	Hayley Smith/Neil Holly
Direct Line	07919 166 173
E-mail Address	localplan@rugby.gov.uk
Date	10 April 2025

Dear Andrew

Duty to cooperate – gypsy and traveller pitches

As you know our respective authorities remain under a legal duty in s33A of the Planning and Compulsory Purchase Act 2004 to cooperate in maximising the effectiveness of the preparation of our development plans in relation to strategic matters which have cross-boundary impacts.

Rugby Borough Council's latest Gypsy and Traveller Accommodation Assessment (2025, unpublished) identifies a need for 95 pitches 2024-2042. We have identified potential site allocations to deliver circa 48 of those pitches, as set out in the ongoing [Preferred Option consultation](#), but a shortfall remains.

I therefore write to you to ask if Warwick District would be able to accommodate any unmet need for Gypsy and Traveller pitches from Rugby Borough, and if so, how many pitches.

Yours sincerely

Hayley Smith
Principal Planning Officer

Rugby Borough Council, Town Hall, Evreux Way, Rugby CV21 2RR
Telephone: (01788) 533533 Email: contactcentre@rugby.gov.uk



By email only to:
West Northamptonshire Council
strategicplan@westnorthants.gov.uk

Please ask for
Direct Line
E-mail Address
Date

Hayley Smith/Neil Holly
07919 166 173
localplan@rugby.gov.uk
10 April 2025

Dear Planning Policy Team

Duty to cooperate – gypsy and traveller pitches

As you know our respective authorities remain under a legal duty in s33A of the Planning and Compulsory Purchase Act 2004 to cooperate in maximising the effectiveness of the preparation of our development plans in relation to strategic matters which have cross-boundary impacts.

Rugby Borough Council's latest Gypsy and Traveller Accommodation Assessment (2025, unpublished) identifies a need for 95 pitches 2024-2042. We have identified potential site allocations to deliver circa 48 of those pitches, as set out in the ongoing [Preferred Option consultation](#), but a shortfall remains.

I therefore write to you to ask if West Northamptonshire would be able to accommodate any unmet need for Gypsy and Traveller pitches from Rugby Borough, and if so, how many pitches.

Yours sincerely

Hayley Smith
Principal Planning Officer

Rugby Borough Council, Town Hall, Evreux Way, Rugby CV21 2RR
Telephone: (01788) 533533 Email: contactcentre@rugby.gov.uk

#RightForRugby

APPENDIX 5 – DUTY TO COOPERATE RESPONSES – GYPSY AND TRAVELLER ACCOMMODATION

Coventry City Council



*Mr Neil Holly
Development Strategy Manager,
Rugby Borough Council,
Town Hall,
Rugby,
CV21 2RR*

Streetscene and Regulatory Services

Postal address:
Coventry City Council
PO Box 15
Council House
Coventry
CV1 5RR

www.coventry.gov.uk

E-mail: rob.back@coventry.gov.uk

Phone : 024 7697 6349

Date: 19th February 2025

Dear Neil,

Thank you for your letter of 5th February to Clare Eggington regarding the Duty to Cooperate and the positions of our respective authorities in relation to employment land and gypsy and traveller pitches. Please accept my apologies that it has taken some time to respond; you will recognise that these are important matters that require due consideration however we have sought to meet your deadline of 20th February.

I agree that CSWAPO has been, and remains, a positive collaborative framework for joint working and the Duty to Co-operate.

I appreciate the recognition of Coventry's unmet need in regard to employment land and would welcome further discussions with the Borough Council on this matter. I particularly welcome the recognition that the Borough may have sufficient employment land supply to contribute to the needs of Coventry city. Prior to these discussions it would be very helpful to understand the overall position on potential employment land supply in the Borough.

Thank you for providing clarity on the Gypsy and Traveller pitch supply and need in the Borough. We participated as a stakeholder in Rugby's GTAA in 2022, and indeed Rugby participated in our own GTAA (2023) and confirmed through that process that it considered Coventry had met the Duty to Co-operate in that regard: there was no reference to any specific cross boundary connections highlighted at that stage in relation to Coventry through either GTAA, nor was anything raised via our consultations to date on our emerging Local Plan.

Whilst the clarity of position on unmet Gypsy and Traveller pitch need is new to the City Council we would, of course, welcome further discussion on how we and other sub-regional partners can work together to address this unmet need.

Whilst we welcome further Duty to Cooperate discussion to enable both authorities to progress our respective plan-making processes, I would like to be clear that I do not think it is appropriate to undertake discussions in relation to a possible 'exchange' between these two different development

needs as you have proposed. Employment and Gypsy and Traveller provision are unrelated matters and as such should be treated separately.

As you are aware, the City Council is now at a very late stage in our Local Plan Review and we intend to submit our emerging Local Plan for examination as soon as possible this year. We note that Rugby's updated evidence in regard to Gypsy and Traveller provision is not yet published and the Council is at an earlier stage in plan making and as such we cannot comment further on this matter at the present time. You should also be aware that no new sites for Gypsy and Traveller provision have been promoted to the City Council through the Call for Sites process. We can confirm that we consider we are able to meet the needs of the city within our own administrative boundaries as set out in our Regulation 19 Local Plan however the evidence we have compiled to date does not suggest and flexibility beyond the needs of the city as matters currently stand.

As proposed we agree that a Statement of Common Ground between our two authorities is necessary and appropriate and we look forward to discussions on this matter at the earliest possible opportunity. We look forward to hearing from you on suggested dates for further discussion.

Yours sincerely,

— — — —

Blaby District Council

FW: Duty to Cooperate - Gypsy and Traveller pitches



Gemma Yardley <Gemma.Yardley@blaby.gov.uk>
To: Local Plan

Orange Category

[Reply](#) [Reply All](#) [Forward](#) [More](#)

Thu 24/04/2025 16:36

Dear Hayley

Thank you for your letter requesting for Blaby District to accommodate unmet need for Gypsy and Traveller pitches from Rugby Borough.

I am writing to let you know the situation in Blaby District. The latest Gypsy and Traveller Accommodation Assessment dated 2022 indicates a total need for 93 pitches 2022 to 2041, with a need of 41 for the first five years. The Council has a limited existing land supply and is seeking to make provision for addition sites through the emerging Local Plan.

We are currently assessing options to accommodate the level of need identified. We will contact you again when this process is complete, but at this stage it is unlikely that Blaby District will be able to accommodate any unmet need for Gypsy and Traveller Pitches from Rugby Borough.

Kind regards

Gemma Yardley
Principal Planning Policy Officer
Planning – Development Strategy
Blaby District Council
Tel: 0116 272 7674

Harborough District Council

RE: Duty to Cooperate - Gypsy and Traveller Pitches

TB

Terry Begley <T.Begley@harborough.gov.uk>

To Local Plan

Cc Tim Parton

25.04.10 DfC letter Harborough.pdf

427 KB

Reply

Reply All

Forward

...

Tue 15/04/2025 15:27

Hi Hayley,

I refer to your letter dated 10 April 2025 requesting whether Harborough District Council would be able to assist in meeting any of Rugby Borough's unmet need for Gypsy and Traveller pitches.

As you will know, Harborough District Council has made significant progress on its new Local Plan. The Proposed Submission Draft Harborough Local Plan 2020-2041 was published in March 2025 for an extended eight-week period of consultation (Regulation 19) which runs until Tuesday 6 May 2025.


Evidence supporting the Draft Local Plan includes the [Gypsy and Traveller Accommodation Assessment](#) (GTAA) published in October 2024. This confirms total need from Gypsy and Traveller households that meet the 2023 PPTS planning definition as 7 pitches; need from undetermined households as 77 pitches; and need from households that do not meet the 2023 PPTS planning definition as 17 pitches between 2024 and 2041. Specifically, the GTAA sets out a need for 5 pitches for Gypsy and Travellers in the first five years.

Three Dragons was commissioned to provide advice on the identification and delivery of sites to meet the accommodation needs of Gypsy and Travellers in Harborough. The [Gypsy & Traveller and Travelling Showpeople site assessment](#) published in November 2024 considered a wide range of sources as potential sites including existing Gypsy and Traveller site opportunities, sites put forward through the SHELAA process, brownfield and public sector land registers, potential sites for sale on the open market, and land owned by the district and county council. Following a detailed staged approach to site assessment the study identifies a mixture of sites that will require allocation or reallocation and use of vacant or underutilized pitch and plots within existing sites that are suitable, available, and achievable with a total estimated capacity of 38 Gypsy and Traveller pitches to meet needs.

On this basis Policy HN06 of the Draft Local Plan includes proposed allocations of 12 pitches at Bonehams Lane, and 3 pitches at Wells Close, Woodway Lane. This exceeds the PPTS planning definition of need in the first five years identified in the GTAA and therefore meets the requirement for the Local Plan. However, the policy also supports extension or intensification of existing Gypsy and Traveller sites and safeguards existing allocations, and lawful Gypsy and Traveller sites that provide a buffer against non-delivery within the first five years as well as helping to meet the PPTS definition in full over the plan period and scope to address some of the undetermined need, should it arise in the future.

For this reason, it is considered that there is no capacity to meet any unmet need arising from elsewhere, in Harborough District.

Kind Regards
Terry



Terry Begley, Principal Planner

T.Begley@harborough.gov.uk

Harborough District Council
The Symington Building, Adam & Eve

Hinckley and Bosworth Borough Council

From: Hayley Smith <Hayley.Smith@rugby.gov.uk>
Sent: 08 January 2026 14:04
To: Nicola Corbishley <Nicola.Corbishley@hinckley-bosworth.gov.uk>
Subject: RE: Preferred options consultation

Afternoon Nicola

In HBBC's response to Rugby's Preferred Option Consultation in 2025, there is reference to the development of the local evidence base with regards Gypsy and Traveller Accommodation, and potential to update later in 2025. Off the back of that, I wonder if there is any update you are able to provide please?

Regards,

From: Nicola Corbishley <Nicola.Corbishley@hinckley-bosworth.gov.uk>
Sent: 08 January 2026 15:46
To: Hayley Smith <Hayley.Smith@rugby.gov.uk>
Cc: Valerie Bunting <Valerie.Bunting@hinckley-bosworth.gov.uk>; Kirstie Rea <Kirstie.Rea@hinckley-bosworth.gov.uk>
Subject: RE: Preferred options consultation

Hi Hayley,

Thanks for making contact.

We still haven't received the final draft of the GTAA yet.

I have copied in my colleague Val, our housing officer, who is involved with this work and who would be better placed to provide an estimate of when we may anticipate the final report.

Kind regards,

Nicola

Nicola Corbishley (she / her / hers)

Planning Policy – Development Services

Date: 17th April 2025

Dear Sir/Madam,

RE: Duty to Cooperate – Gypsy and Traveller pitches

Thank you for contacting Nuneaton and Bedworth Borough Council (NBBC) regarding Rugby Borough's unmet need for Gypsy and Traveller pitches. We recognise that Rugby Borough Council's latest Gypsy and Traveller Accommodation Assessment (2025) identifies a need for 95 pitches (2024-2042) and that circa 48 of those pitches have been potentially identified as site allocations, as set out in Rugby Borough's Preferred Options consultation document. To note, NBBC was not asked to help meet the needs of any neighbouring local planning authorities at the time of submitting [Nuneaton and Bedworth's Gypsy and Traveller Site Allocations Development Plan Document \(DPD\) \(2024\)](#), to the Planning Inspectorate, on 29th June 2022.

To ensure sufficient Gypsy and Traveller pitches are provided in Nuneaton and Bedworth Borough, offering travelling communities the opportunity to live, work, visit and rest within our administrative boundary, the Gypsy and Traveller Site Allocations DPD was produced, based upon the [Gypsy and Traveller and Travelling Showperson Accommodation Assessment \(GTTSAA\) \(2021\)](#).

The need for new Gypsy and Traveller pitches is set out in Strategic Policy GT1 – Overall Need, within the DPD, outlining the need for at least 11 new permanent residential pitches to accommodate Gypsies and Travellers between 2021 and 2037. This is based on meeting the overall 'cultural need' for pitches identified in the GTTSAA (2021), which includes need arising from those within the Travelling community who do not meet the Planning Policy for Traveller Sites ('PPTS') definition of "Gypsies and Travellers".

The sites that have been found acceptable to allocate, through the GTTSAA (2021), provide up to 15 pitches at three locations, set out in Policy GT3 – Site Allocations in the DPD. The potential additional pitches, above the minimum provision of 11, build in some resilience should the anticipated levels of turnover at The Griff, in Nuneaton and Bedworth Borough, not take place. Whilst the GTTSAA (2021) states that turnover on this site could meet the identified shortfall in its entirety, there is no guarantee that these pitches will become available at the rate envisaged. Therefore, NBBC are taking a cautious approach to meeting the Borough's need for new Gypsy and Traveller pitches and in turn, the provision of these pitches should not be considered as a method of meeting need from adjacent Local Planning Authority areas.

Therefore, NBBC are not able to accommodate any unmet need for Gypsy and Traveller pitches from Rugby Borough. However, we look forward to continuing to

work with you on strategic matters, which have cross-boundary implications, in the future.

Yours Faithfully,

Stratford on Avon District Council

FW: Duty to Cooperate - gypsy and traveller pitches



Joanne Bozdoganli <Joanne.Bozdoganli@stratford-dc.gov.uk>

To: Local Plan

Cc: John Careford; Andrew Cornfoot; Gemma Hawkesford; Tony Ward

Follow up. Start by 02 September 2025. Due by 02 September 2025.



Reply Reply All Forward ...
Fri 29/08/2025 13:27

Thanks for your letter dated 10th April (attached) regarding gypsy and traveller provision within Rugby Borough and the request for Stratford-on-Avon District to accommodate any unmet need.

I appreciate that Rugby Borough has a considerable identified need for gypsy and traveller pitches and remains to identify sites necessary to accommodate a further 47 pitches (beyond those currently identified on potential site allocations in your Preferred Option consultation).

Stratford-on-Avon District also faces a considerable challenge to provide the 71 gypsy and traveller pitches and 12 travelling showpeople plots that have been identified in our latest GTAA Study (August 2024). This report (link below) was commissioned to assess need across the SWLP area and also sets out the requirement for Warwick District Council (18 gypsy and traveller pitches plus 12 travelling showpeople plots).
<https://www.southwarwickshire.org.uk/doc/213088/name/Stratford%20on%20Avon%20District%20and%20Warwick%20District%20final%20GTAA%20report%2018924.pdf>

To date, and despite undertaking three call for sites exercises as part of the South Warwickshire Local Plan preparation, the District has had no specific sites put forward that may have the potential to address some of its identified need. Therefore, for the avoidance of doubt Stratford-on-Avon District is not currently able to confirm that we can meet our own needs.

Given that we yet have yet to address this considerable challenge, I find it difficult to see how Stratford-on-Avon District could find a way forward to be able to assist you in meeting any of Rugby's unmet need at this time.

As always, Stratford-on-Avon District Council will remain open to further discussions regarding this subject matter and may be looking for a reciprocal conversation with Rugby in due course.

Kind Regards

Jo

Jo Bozdoganli (she/her/hers)
Policy Manager
Stratford-on-Avon District Council



Place, Arts & Economy
Philip Clarke –Head of Service

Warwick District Council
Town Hall, Parade,
Royal Leamington Spa CV32 4AT

By email only to:

Rugby Borough Council
Hayley.Smith@rugby.gov.uk
Principal Planning Officer (Development
Strategy)

direct line: 01926 45613

email:

planning.enquiries@warwickdc.gov.uk

web: www.warwickdc.gov.uk

29 August 2025

Dear Hayley

Duty to cooperate – gypsy and traveller pitches

Thank you for your letter sent on 10th April relating the above. Please accept our apologies for the delay in responding fully. I appreciate that Rugby Borough Council has a considerable identified need for gypsy and traveller pitches and remains to identify sites necessary to accommodate a further 47 pitches (beyond those currently identified on potential site allocations in your Preferred Option consultation).

Warwick District also faces a considerable challenge to provide the 18 gypsy and traveller pitches and 6 travelling showpeople plots that have been identified in our latest GTAA Study (August 2024). This report (link below) was commissioned to assess need across the SWLP area and also sets out the requirement for Stratford District Council (71 gypsy and traveller pitches plus 12 travelling showpeople plots).

<https://www.southwarwickshire.org.uk/doc/213088/name/Stratford%20on%20Avon%20District%20and%20Warwick%20District%20final%20GTAA%20report%2018924.pdf>

To date, despite undertaking 3 call for sites processes in the South Warwickshire Local Plan making endeavours, Warwick District has had only one site put forward that may have the potential to address some its identified need (the ultimate release of this site for this purpose is by no means a forgone conclusion). Therefore, for the avoidance of doubt Warwick District is not able to confirm that we can meet our own needs.

Given that we yet have yet to address this considerable challenge, I find it difficult to see how Warwick District could find a way forward to be able to assist you in meeting any of Rugby's unmet need.

As always, Warwick District will remain open to further discussions regarding this subject matter and may be looking for a reciprocal conversation with Rugby in due course.



Yours sincerely

Tony Ward
Senior Planning Policy Officer
Direct Line 01925 456502

APPENDIX 6 – GYPSY AND TRAVELLER ACCOMMODATION MEETING NOTES, OCTOBER 2025

Duty to Cooperate Meeting - Gypsy and Traveller Accommodation

08 October 2025

Attendees

Summary of each LPA's current position

Rugby Borough

Published GTAA in March 2025 showing a need for 94 pitches to 2042

High need based on existing large population, which is predominantly located near to the edge of Coventry and to the Nuneaton and Bedworth administrative boundary.

Methodology includes evidence-based assumption regarding the dissolution of households.

No sites forthcoming through the call for sites

Supply coming from/being sought through the following methods:

Pitches granted on appeal

Allocations on strategic employment allocations (envisage serviced sites to be provided and marketed via S106 obligations)

Converting existing unauthorised or temporary permission sites to allocations

Appointed GTAA consultant has identified some privately owned land that did not come forward through the call for sites

Wrote to Duty to Cooperate partners in April 2025 (Coventry, Warwickshire authorities, neighbouring authorities in Leicestershire and Northamptonshire) to request assistance with an identified shortfall.

Whilst RBC still has an overall shortfall for the local plan period, the position is slightly improved from April – now identified a 10 year supply (to 2035).

In the process of agreeing a SoCG with Coventry City which will explore unmet need at a future review.

Understand that new sites likely to be private, and based on feedback from WCC in previous meetings on this topic that new Local Authority (LA) managed sites unlikely to be an option.

North Warwickshire

Latest GTAA published in 2020 (runs to 2040). Subject to agreement, a new GTAA will be commissioned for the local plan review.

No sites currently allocated.

Supply from appeals, but exploring other options as part of local plan review work including direct approach to existing private site owners where there may be further capacity

Also planning to approach WCC and other public bodies who may own land that may be suitable

Keen to learn from this group, as some are at a more advanced stage.

Warwick and Stratford on Avon Districts (South Warwickshire)

Joint GTAA published in 2024, demonstrating need for 89 pitches in total (71 in Stratford and 18 in Warwick)

No sites forthcoming through call for sites

SDC has an additional need for Travelling Showpeople – need differs from other Gypsy and Traveller accommodation

Supply and supply opportunities:

Appeal decisions

Allocations as part of strategic housing growth

Intensification/rationalisation of existing sites

Potentially regularising temporary permissions

Council owned site – future potential when available

Based on discussions with other LPAs across the country which have allocated/are in the process of allocating Gypsy and Traveller sites as part of strategic allocations, the implementation stage is the most challenging.

Nuneaton and Bedworth Borough

Adopted a DPD in January 2024 – shows NBBC can meet its own identified need and includes a buffer.

Early stage of considering whether Gypsy and Traveller Accommodation forms part of the immediate local plan review, or whether retained as a separate DPD.

Key discussion points summary

Perspective of WCC has changed from that advised in previous discussions. More positive towards the possibility of WCC managed sites – subject to being financially viable.

Both LL and MRC in agreement that well managed public sector sites usually provide the best outcomes for residents

Possibility of new allocations being managed by WCC – further discussion required

Agreed that LL would compile and share a short paper within the next couple of weeks examining the potential options of a) LA managed sites and b) LA support offering for private sites – objective of improving outcomes for residents

8-12 pitches recommended size.

For sites larger than this, design/layout/landscaping becomes important

Discussion around appropriate locations for accommodation – MRC notes relative proximity to facilities and services required (e.g. schools and health services), which is at odds with many of the appeal locations in the countryside across Warwickshire.

Forthcoming FFT research (based on surveys) likely to support the above regarding access (and proximity) to services. Could be useful evidence.

Discussed evidence that some Gypsy and Traveller pitches are being sublet, and sometimes not to ethnic gypsies and travellers. Some are being let to migrant workers, others to members of the settled community as a result of lower rent costs. Not clear how to prevent this (given that conditions/obligations are applied when planning permissions are granted restricting occupation) nor what action could be taken. This may dilute the benefit of rationalising private family sites, and lends support LA managed sites

Actions arising


Agreed to reconvene this group in a few months time – to be agreed by CSWAPO


LL to produce and circulate a paper on new sites – addressing both WCC management and support for private sites coming forward.




MRC to circulate FFT research once complete

APPENDIX 7 – NATURAL ENGLAND CORRESPONDENCE

RE: Rugby Borough Local Plan - Duty to Cooperate

 Emily Bond <Emily.Bond@naturalengland.org.uk>
To: Hayley Smith

 You forwarded this message on 15/01/2026 15:14.

  Reply  Reply All  Forward  

Thu 15/01/2026 15:12

Dear Hayley

Rugby Borough Local Plan - Duty to Cooperate

Thank you for your invitation to attend the above meeting in connection with your emerging Local Plan.

Unfortunately, Natural England will be unable to send a representative as our resources are limited and it is not possible to accept all such invitations.

We look forward to receiving the consultation on your Regulation 19 Plan.

Please send all new consultations directly to consultations@naturalengland.org.uk to be appropriately logged. As sending documentation to officers can result in processing delays.

Many thanks, and kind regards.

Emily Bond
Higher Officer – Sustainable Development
West Midlands Area Team
Natural England
County Hall
Spetchley Road
Worcester
WR5 2NP
07500 025213

APPENDIX 8 – NOTES OF DTC MEETING WITH WEST NORTHAMPTONSHIRE COUNCIL

Meeting held 08 May 2025

Attendees: Neil Holly (RBC), Hayley Smith (RBC), Richard Wood (WNC) and Alan Munn (WNC)

Gypsy and Traveller Pitches

- Meeting arranged following RBC's letter dated 10 April to WNC regarding gypsy and traveller pitch shortfall in Rugby Borough. This letter was sent to each of Rugby's neighbouring authorities.
- NH set out background to Rugby's current position on gypsy and traveller shortfall, including the GTAA evidence, and previous call for sites outcomes.
- Proposals to regularise unauthorised and temporary pitches, and proposing allocations connected to large employment allocations. These proposals in the Regulation 18 Preferred Option consultation would deliver circa half of the identified need (95 pitches).
- WNC will require some time to respond. There is ongoing work to determine the authority's latest need position, and there have been recent changes to the political administration following the local elections. It was agreed that WNC should respond when able to do so.

Other matters

The following matters were also discussed:

- WNC to undertake a Regulation 18 consultation (preferred option) in the autumn.
- RBC working toward Regulation 19 consultation at the beginning of 2026.
- Discussed DIRFT 4 and its promotion as part of WNC's local plan process. Noted the potential impact of the Magna Park expansion proposed by Harborough in its Regulation 19 plan in respect of the highway network.
- Noted the RBC position on the Lodge Farm proposal between Daventry and Rugby – this is not a proposed allocation in the current Regulation 18 consultation, but has been assessed as a reasonable alternative. There is a local action group (Stand Against Lodge Farm Village) holding public meetings to support people in making representations against any future inclusion of this site. The action group was set up in response to the inclusion of this site (albeit a smaller version) in the last local plan process, when it was deleted from the plan at examination.
- Noted that a Strategic Transport Assessment of Rugby's preferred option is yet to be completed – anticipated in October.
- Agreed to meet again later in 2025 as both RBC and WNC's local plans progress.