

Standing up for the Warwickshire Countryside

5 January 2018

## RUGBY LOCAL PLAN EXAMINATION

### MATTER 1: DUTY TO CO-OPERATE

Rugby Council has signed the Housing Memorandum of Understanding (September 2015) and this is presented as the result of agreement between the Coventry and Warwickshire local authorities. This results in the Local Plan providing for a claimed 'unmet need' from Coventry of 2,800 dwellings.

The Memorandum of Understanding has not been justified and has not been subject to either public participation or SEA. But it is treated by Rugby as requiring the allocation of more housing than is justified by a direct assessment of the household projections for Rugby itself.

The Examination should not accept the MOU as a basis for the housing and employment proposals.

#### The Need for an Urgent Review of the Housing Memorandum of Understanding

CPRE is a member of the 'Keep Our Green Belt Green' consortium of local and environmental groups in Coventry and Warwickshire. Keep Our Green Belt Green (KOGG) considers that the Housing Memorandum of Understanding no longer provides a valid basis for local plans in Coventry and Warwickshire, if indeed it ever did. The Consortium wrote to all the Coventry and Warwickshire local authorities on 20 December 2017 calling for an urgent review of the Memorandum.

This letter, which CPRE fully supports, is attached. It criticises the process by which the Memorandum was drawn up and agreed (for example the lack of public consultation and the absence of a sub-regional sustainability appraisal), the content of the Memorandum itself, and the way it has been used since its inception in 2015. It also draws attention to new information about student numbers, international migration and internal migration which casts grave doubt on the validity of the population and household projections for Coventry in particular. These problems have been recognised by the Office for National Statistics, the authors of the projections.

'Keep Our Green Belt Green' sponsored further demographic work by two demographic experts, Piers Elias and Greg Ball. A summary of this is attached. They found strong evidence of over-estimation of population and household growth in Coventry in particular. Although further work would be needed to establish the extent of this over-estimation, it could amount to up to 24,000 households, greater than the element of Coventry's housing need that the MoU claimed could not be accommodated in the city.

We are submitting the work that was undertaken for KOGG and has been circulated to the local authorities. It demonstrates that it is not necessary for Rugby to accommodate any housing overspill from Coventry during the plan period.

At the time of writing, a response from Rugby Council to the letter from 'Keep Our Green Belt Green' is awaited.

