

Coventry Local Plan Review

Regulation 19

Proposed Submission (Publication) Stage Representation Form

(guidance note below)

Ref:

(For official use only)

Name of the Plan
to which this
representation
relates:

**Coventry Local Plan Review – Regulation 19 Proposed
Submission (Publication)**

Please return to Coventry City Council in writing or electronically by 23:59 03 March 2025 email to planningpolicy@coventry.gov.uk, via our consultation portal <https://coventrycitycouncil.inconsult.uk/system/home> or by post to Planning Policy Team, PO Box 7097, Coventry, CV6 9SL

Please refer to the following data protection/privacy notice:
www.coventry.gov.uk/planningpolicyprivacynotice

Please also note that that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Mr	
First Name	Simon	
Last Name	Doble	
Job Title	Deputy Director of Primary Care	
(where relevant)		
Organisation	NHS Coventry and Warwickshire Integrated Care Board	
(where relevant)		
Address Line 1	Shire Hall	
Line 2	Warwick	
Line 3		
Line 4		
Post Code	CV34 4RL	
Telephone Number		

E-mail Address

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan Review does this representation relate?

Paragraph

All

Policy

All

4. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I write on behalf of NHS Coventry and Warwickshire Integrated Care Board (ICB) in response to the publication of the above document (hereafter referred to as the Local Plan). The ICB is grateful to Coventry City Council for the opportunity to provide comments. Its focus in doing so is to ensure that primary medical care (General Practice) infrastructure is adequately provided for within the Section 106 framework and that funding of future primary medical care provision and access is not compromised through housing development and population growth.

The ICB recognises that the Local Plan development process sets out a clear way to ensure the planning policies that the council will use to meet future development needs in terms of housing and job growth, reflect the views of the local population and key partners. The proposed plan estimates that the local housing need for Coventry for the period 2021 – 2041 is 29,100 (1,455 per annum), all of which will be delivered fully within Coventry's administrative area.

Coventry and Warwickshire Integrated Care System (ICS) is projected to experience notable population growth. According to Coventry and Warwickshire Estate Strategy, the population is expected to increase by 14% by 2040, reaching nearly 2,242,536 residents. As the council will already be aware, the population arising from any new housing provided in Coventry will place increased demand upon healthcare services within the area, including primary medical care services provided within the Coventry City administrative area.

The ICB welcomes the opportunity to comment on the proposed plan and options for growth and agrees with the priority placed on the three overarching principles that will sit at the heart of the Coventry Local Plan (improving outcomes and tackling inequalities, tackling climate change, and increasing the economic prosperity) ensuring that these areas are addressed through the planning policies.

The NHS Long Term Plan has set a clear future direction of travel for the NHS in England and building on the national strategic aims outlined within Five Year Forward View. The General Practice Forward View places strong emphasis on the need to expand and strengthen primary and wider out-of-hospital care. More recently, the Fuller Stocktake underscored the necessity of integrating primary care with broader community services to facilitate a shift towards proactive, personalised care models and the Darzi Report, "High Quality Care for All", emphasised the imperative of quality improvement and patient-centered service delivery. NHS England is currently co-producing a ten-year health plan, which drives a transformative agenda centred on three big shifts: moving

health and care from hospital to the community, digitising services, and emphasising prevention. As such, developments (including community and health infrastructure) that support innovations in patient care, increased use of technology and integration of health, wellbeing and wider community services to develop community wellbeing and cohesion, are key to delivering the vision and strategic objectives detailed in the local plan.

Within the ICS, the geographical footprint is co-ordinated around four 'place' areas: Coventry is one of the four, and this aligns with the scope of the proposed Coventry Local Plan.

Strong partnerships between community services, general practice, social care, secondary care, and the voluntary sector with co-designed services are key foundations for our model of integrated care. A focus on community cohesion is key to addressing wider determinants of health and addressing health inequalities.

The ICB welcomes the inclusion of health and wellbeing in the plan's strategic vision under Policy HW1, which takes into account the significant impacts on health and wellbeing of the population as well as the indirect implications for the wider community. A key role of the Local Plan is to provide for development in a way that supports healthy and active lifestyles. In addition, recognition of local health provisions in section 8.8 that:

"As the city's population continues to grow and the needs of the population change in terms of an ageing population, the Council will continue to work with the Integrated Care Board and The University Hospital Coventry and Warwickshire NHS Trust. Although the city's population will remain one of the youngest across the sub-region it is still expected to age, and as such it will be important to ensure new facilities are easily accessible to those who need them".

As mentioned earlier in the response, the ICB has a duty to ensure that primary medical care (General Practice) infrastructure is adequately provided for within the Section 106 framework and that funding of future health provision and access is not compromised through housing development and population growth. The ICB envisages closer working with Coventry City Council and would also be grateful to collaborate proactively to help inform and develop the future Health Impact Assessment and Supplementary Planning Documents that will be undertaken through the development of the Local Plan.

The ICB, with all health and care partners recognises that population health approaches and community wellbeing is key to addressing our health inequalities. The implementation of any of the projects requires a whole system approach to implementation beyond the physical implementation of the infrastructure (physical or digital) to support our population to access health and care and manage their health and wellbeing. Adequate allowances for this need to be made in Section 106 approaches being implemented.

The ICB will ask the Council to share as much information as possible with it at the earliest stage as regards the likely profile of the population arising from any planned

housing development. This will assist the ICB's wider planning process by enabling it to understand the likely health needs of the population, as well as the preferred channels of communication of sub-groups within the population, which in turn, allows for more effective service development, delivery, and population engagement.

The ICB notes the following key trends and wider growth which sets the context for the plan.

- The ICB is aware that healthcare delivery is in some areas increasingly provided from converted retail and industrial units and where need and funding is identified would support this use, following the standard NHS England health delivery site planning processes.
- The ICB would strongly endorse the direction of net zero carbon and associated sustainability plans.
- ICB is working closely with Coventry City Council planning team in relation to local housing and population growth.

The ICB welcomes the key objectives which will have a positive impact on local population health, notably:

- To support strong, vibrant and healthy communities, and protect enhance local services and facilities
- To protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy
- To help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure

Key Messages

- Existing primary medical care capacity in Coventry will not be sufficient to meet the housing growth proposed in the modified Local Plan.
- The ICB will require suitable provisions put in place and adequate allowances made in the Section 106 work being undertaken by the local Council.
- A collaborative approach between the ICB, health and care partners, and the local Council will be needed in support of the above, having regard to the Integrated Care System's 10 year Infrastructure Strategy.
- The ICB would welcome the opportunity to engage further with the local council regarding what physical infrastructure projects/schemes will require support via Section 106 planning obligations.
- The ICB does not expect physical infrastructure (built space) to form the "whole solution" and wishes to explore what opportunities there are to support other means of delivering additional primary medical care capacity via Section 106 planning obligations.
- The ICB would request that the council gives full consideration to the need for good public transportation links to be in place to enable the population to

access GP practice premises across the district (including any new premises constructed during the Plan period).

- The ICB is mindful that broader issues affecting population health and wellbeing, including air pollution/quality and the availability of green spaces, are priorities. Recognising this, the ICB would strongly endorse the direction, including the use of Health Impact Assessments.
- The ICB will wish to work proactively with Coventry City Council to help inform and develop any future *Health Impact Supplementary Planning Document*.
- The ICB would ask the local council to share as much information as possible with it at the earliest stage as regards the likely profile of the population arising from any planned housing development. This will assist the ICB's wider planning process by enabling it to understand the likely health needs of the population, as well as the preferred channels of communication of sub-groups within the population, which in turn, allows for more effective service development, delivery and population engagement.

I would, finally, like to thank you for giving the ICB the opportunity to comment on the proposed plan. We trust that the above comments will be taken into consideration. If appropriate, we would be more than happy to have further discussions with either Coventry City Council or their appointed representatives.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

7. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

All

Please add any further comments relating to the SA report in the box below

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

X

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet /expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.