

Agenda Item No 9

Local Development Framework Sub-Committee

26 February 2025

Report of the Chief Executive

Coventry City Council Local Plan Reg 19 Plan Consultation

1 Summary

- 1.1 This report informs Members of the consultation on Coventry City Council's Submission Local Plan.

Recommendation to Sub-Committee:

- a That Members note and agree the observations raised on the Regulation 19 Consultation 2025 and;**
- b That these comments and any additional comments Members may raise following consideration at this Sub-Committee be forwarded to Coventry City Council.**

2 Consultation

- 2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.
- 2.2 Members previously saw the Coventry Local Plan Review Issues and Options Regulation 18 Consultation which was reported to the Sub-committee on 11 September 2023.

3 Background

- 3.1 Coventry City Council adopted its Local Plan and accompanying Area Action Plan for the City Centre in December 2017 addressing the development needed up until 2031. Current planning legislation requires that the policies of the adopted Local Plan should be reviewed every five years to see if they are up to date or whether they need changing or even rewriting to reflect changes to national policy or other matters. The Local Plan review will be looking forward to 2041 in terms of addressing future needs.
- 3.2 Coventry City Council are currently consulting on the Regulation 19 Local Plan Document from Monday 20 January 2025 to Monday 3 March 2025. In terms of comments and responses from the Borough Council these will be focused on the Local Plan review rather than the associated Area Action Plan (Chapter 14 of the Document).

3.3 This is a formal, statutory stage in the preparation of the Local Plan and comments can only be made on the following grounds

- **Legal compliance:** Does the Local Plan comply with the legal and procedural requirements for its preparation?
- **Soundness:** Is the Local Plan sound? Has it been positively prepared, justified, effective and aligned with national policy? Does it meet the following four tests? It must be:
- **Positively prepared** – the Plan has attempted to meet all of Coventry’s housing and employment land needs and discussions have taken place with neighbouring councils to help meet any shortfalls.
- **Justified** – the Plan sets out a development strategy that has been informed by up-to-date evidence and consideration has been given to alternative strategies.
- **Effective** – the Plan is deliverable, and efforts have been made to address any issues impacting on the broader region. Consistent with national policy.
- **Duty to Cooperate:** Has the plan complied with the Duty to Cooperate? Has the Council engaged and collaborated effectively with neighbouring authorities and other legally prescribed organisations in preparing the Local Plan?

4 The Local Plan

4.1 The Policy areas likely to have the most impact on North Warwickshire are Chapter 5 relating to Jobs and the Economy and Chapter 6 relating to the delivery of homes as well as the Duty to Co-operate. These are outlined below.

Chapter 5 (Jobs and Economy)

4.2 Coventry’s employment need for the period 2021 to 2041 is for 105 hectares of employment land (including qualitative replacements). The Local Plan seeks to deliver 60 hectares of employment land. They expect to be able to deliver the Strategic Employment need of 25 hectares. However, the City Council does not consider it to be possible to deliver all this additional development land within the city boundary. Coventry City therefore has a shortfall of 45 hectares of employment land.

Local Employment Need

4.3 Coventry City Council have identified that this shortfall of 45 hectares is for the Local Employment need. To meet this shortfall Coventry City Council is seeking neighbours to deliver this land and will continue to work proactively with neighbouring Councils through the Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Functional Economic Market Area.

Chapter 6 (Delivering Coventry's Housing Needs)

- 4.4 A minimum of 29,100 additional dwellings have been planned for and will be provided between 2021 and 2041. Coventry City Council can fully deliver this need within their area, using an urban and brownfield-focused strategy of site allocations and densification. The Duty to Co-operate (Policy DS2) states where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.
- 4.5 Through Policy H7 Coventry City Council will provide for at least 6 permanent Gypsy and Traveller Pitches.

Duty to Co-operate

- 4.6 Work on the Duty to Co-operate is still ongoing. A Statement of Common Ground / Memorandum of Understanding is being drafted and will be shared with Members once available. There has been no agreement how the employment shortfall will be addressed. Work is continuing with partners under the Duty to Co-operate to work collaboratively and constructively to address strategic need as, being a constrained area, no further opportunities are available in Coventry.

Green Belt

- 4.5 There are no proposals for release of any land from the Green Belt within the Regulation 19 version of the Local Plan.

Other sections

- 4.6 The remaining sections of the plan deal primarily with updating and improving the adopted Coventry City Local Plan Policies and this is not considered necessary to comment, as these do not directly impact on North Warwickshire Borough planning issues currently.

5 Observations

- 5.1 The Borough Council will continue to work with Coventry City Council through the Duty to Cooperate. Although none of the allocated Employment sites are in close proximity to the North Warwickshire border, delivery of the associated infrastructure to support these allocations is welcomed. It is, however, disappointing that there is a 45 hectares shortfall in employment land that is expected to be delivered elsewhere in Warwickshire. The Borough Council will seek further information to ensure that all possibilities have been exhausted within Coventry and the surrounding area, including consideration of releasing Green Belt.

- 5.2 Site H2.1 (Kerseley Sue) lies directly adjacent to the North Warwickshire Borough Boundary. Delivery of the associated infrastructure is very important to this site and the Borough Council welcomes the opportunity to work with Coventry City Council as per Policy DS2 as outlined in paragraph 4.3 above. The Borough Council also supports Coventry City Council in being able to meet their need for housing and, also, for the needs of the Gypsy & Traveller community.
- 5.3 The Borough Council generally supports the approach to ensure issues are widely discussed and addressed as per Policy DS2. When there is a suitable draft of the SoCG or MoU this will be shared with members.

6 In Summary

- 6.1 This Council is in general support of the Coventry Local Plan Regulation 19 Consultation subject to the comments made above and any comments that may be reported by Members. Meeting their housing needs within the City is welcomed but it is disappointing there is a 45 hectares shortfall in the provision of employment land. This element will need to be a formal objection at this stage of the Plan making process.

7 Report Implications

7.1 Environment and Sustainability Implications

- 7.1.1 The Coventry Local Plan Review Regulation 19 Consultation 2025 has a separate Sustainability Appraisal and Habitats Regulation Assessment (HRA) included as part of the consultation process.

7.2 Risk Management Implications

- 7.2.1 The Duty to Co-operate policy will need continued monitoring in order to mitigate any future risk or pressures arising from employment capacity shortfalls within Coventry City area. No further specific risk management implications noted.

7.3 Legal Implications

- 7.3.1 Although the Planning and Levelling up Bill proposed abolition of the duty to co-operate under the Planning and Compulsory Purchase Act 2004, it remains in force in relation to preparation of local plan documents. The Borough Council supports Coventry City's intention to maintain current approaches and jointly work with other authorities and persons via effective and appropriate means (as must this Council) in the preparation of such documents

The Contact Officer for this report issue Sue Wilson (01827 719499).

Background Papers

Local Government Act 1972 Section 100D, as substituted by the Local Government Act,
2000 Section 97

Background Paper No	Author	Nature of Background Paper	Date