



Coventry City Council – Coventry Local Plan Review – Regulation 19 Proposed Submission. December 2024

Response from Warwick District Council and Stratford-on-Avon District Council
27th February 2025

Introduction

Coventry City Council has invited representations regarding their Proposed Submission consultation on the Coventry Local Plan Review.

The consultation has been prepared under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and is the final consultation document before the plan is submitted to the Secretary of State for its independent examination.

Comments made at this stage are formal representations which should specifically relate to the soundness of the plan, its legal compliance and its compliance with the Duty to Co-operate. The four specific soundness tests set out in para 36 of the 2024 NPPF are:

- a) **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development:
- b) **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

In addition to these four tests, the Plan needs to fulfil the following legal obligations:

- a) **Legal Compliance** - meeting the legal requirements made under various planning laws; and

- b) **Duty to Cooperate (DtC)** - meeting the legal duty to cooperate with neighbouring authorities on key strategic issues.

The consultation commenced on 20th January 2025 and ends on 3rd March 2025. The consultation documentation can be viewed [online](#). The consultation was launched shortly after the publication of the 2024 NPPF on 12th December 2024, and therefore the Local Plan Review has been prepared in accordance with the December 2023 version of the NPPF, as permissible by transitional arrangements set out in the more recent update.

This response is written on behalf of both Warwick District Council (WDC) and Stratford-on-Avon District Council (SDC). The two authorities are working together on preparing a joint South Warwickshire Local Plan (SWLP) and are currently also currently consulting on the Local Plan, albeit undertaking a Preferred Options consultation at the earlier Regulation 18 stage.

Context and background

Warwick District Council and Coventry City Council share an administrative boundary with the District being located to the south of Coventry. WDC, SDC and Coventry City Council, along with other Warwickshire authorities, are all part of the Coventry & Warwickshire Housing Market Area (HMA) and Functional Economic Market Area (FEMA). All three authorities, along with other Warwickshire authorities and Solihull Metropolitan Borough Council, meet monthly through the Coventry, Solihull & Warwickshire Association of Planning Officer (CSWAPO) to discuss strategic planning matters.

Response – covering relevant strategy planning matters

Housing

Paragraph 3.10 of the consultation identifies a Local Housing Need of 29,100 for the proposed Plan period (2021-2041). This equates to 1,455 new homes per annum and the City Council has stated that this will be delivered fully within Coventry's administrative area through an urban and brownfield-focused strategy of allocations and densification.

We agree that the Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 is an appropriate assessment upon which to basis decisions upon housing need for plan-making for the City. We generally support the detailed justification for this as set out in the Overall Levels of Growth Background Paper which is listed as supporting evidence base that has informed the Local Plan review.

However, we would note that the HEDNA proposes a figure of 1,964 dwellings per annum for Coventry. Paragraph 3.26 of the evidence document, 'Review of Coventry's Local Housing Need' produced by Iceni in 2024, indicates that the figure of 1,455 is

simply the HEDNA figure minus the 35% urban uplift applied to the largest cities nationally.

Whilst WDC and SDC agree with the City Council that the 35% urban uplift applied to the largest cities nationally is arbitrary and not evidenced, we would highlight the potential incompatibility of the approach to progress the Plan Review under the transitional arrangements and therefore a previous version of the NPPF that includes the urban uplift, rather than the updated NPPF where it has been removed. There is a danger that this may be considered to be ‘cherry picking’ which elements of national policy should be applied.

Notwithstanding that the City Council is preparing the Local Plan Review under the NPPF transitional arrangements and thus preparing the plan in accordance with the 2023 version of the NPPF, we note and support the fact that at the time of writing, delivery of 1,455 dwellings per annum is greater than the figure (1,388) that would be required by applying the new national Standard Method for assessing housing need.

The South Warwickshire authorities (WDC & SDC) welcome the urban and brownfield-focused strategy of allocations and densification, which means that Warwickshire authorities will not be asked to take on any unmet housing need from Coventry, as was the case in the last round of Local Plan reviews. We are therefore satisfied that the City Council is planning to meet its needs as per the HEDNA, which is also higher than the Local Housing Need identified for the City under the new standard method.

Employment Land

WDC and SDC support the Coventry & Warwickshire HEDNA (2022) as being the starting point for the City Council to identify its employment land needs. We also support the consideration of the West Midlands Strategic Employment Sites Study (WMSESS) (2024) that considered the needs of large-scale warehousing and logistics and the subsequent Alignment Paper (2024) that ensured all evidence was consistent, up-to-date and to identify the employment needs of the city, Warwickshire authorities and identify any residual need.

It is acknowledged that the City Council has undertaken multiple call for sites exercises and an Employment Land Review (2024) before concluding it is unable to accommodate all of its employment growth need within the city.

In summary, paragraphs 3.14 and 3.15 of the consultation document identify that:

- **Office needs** – the City Council can accommodate its own office needs, primarily but not exclusively within a revised Friargate allocation in the city centre
- **Local Employment need** – Taking into account supply, completions and allocations, the Council is able to accommodate 60 hectares of local employment need (Use classes E(g) (iii), B2 and B8), with a remaining shortfall of 45 hectares which it is not able to accommodate within its own boundaries

- **Strategic need** – One allocation, Baginton Fields, can contribute towards these needs (25 hectares in size). Paragraph 3.15 highlights that Coventry, being a constrained area, has no further opportunities to meet this need.

Paragraph 3.15 is correct in that it does highlight that the City Council is discussing these matters with Duty to Co-operate partners. These discussions are ongoing and both Warwick District Council and Stratford-on-Avon District Council will continue to fully contribute to such discussions.

In discussing potential opportunities for the South Warwickshire local authorities to meet any unmet employment need from Coventry, the following must however be acknowledged:

- that the housing and employment needs of WDC and SDC are themselves extensive
 - Housing – the updated Standard Method has resulted in significant increases in local housing need for both authorities (63% increase for WDC and 104% increase for SDC) in comparison to a considerable reduction in Coventry's figure (55% reduction). The HEDNA had also identified notable increases for the South Warwickshire authorities
 - Employment - A substantial amount of employment land need has been established as being required in South Warwickshire and we would note that the most significant strategic sites need is in Area 8 (of the 2024 WMSESS), covering Warwick and Stratford-on-Avon Districts for 75-125 hectares
- that large areas of South Warwickshire are constrained by Green Belt and the Cotswolds Area of Outstanding Natural Beauty.

Given that the City Council does not believe it can meet its own employment land needs, it is difficult to understand why the City Council does not consider Westwood Business Park, located not far from the local authority boundary with Warwick District, to be a Key Employment Site (sites are set out in Strategic Policy JE2: Provision of Employment Land and Premises) given that this scores reasonably highly in the Employment Land Review. We note that it scores the 8th highest of all employment sites but the city council has drawn the line for Key Employment Sites at the top 7 – sites which score only 1 point higher. The lack of inclusion of this site means it is afforded less protection as an employment site. It is also difficult to understand why in the context of employment land need, the Council has been supportive of conversions or re-development of land on the Business Park for non-employment uses, notably student accommodation. Given this employment need the South Warwickshire authorities would like to understand the Council's stance on the future of this employment site, particularly in light of:

- Strategic Policy JE1: Overall Economy and Employment Strategy
 - (part a) supporting fostering partnership working with the city's Universities to promote innovation
 - (part d) stating that there will be a presumption against the loss of employment uses

- (part i) supporting the two universities and in doing so maximise the economic development associated with them.
- Paragraph 5.13 of the supporting text highlighting that sites with close links to the universities are desirable for research and development occupiers.

In preparing the Regulation 19 Plan, the City Council undertook the [Green Belt Technical Update Study \(2024\)](#) with the conclusion that all green belt, and safeguarded land, was to be rolled forward and remain unallocated for development.

The [2024 HELAA](#) produced to support the plan shows all of the sites that were submitted and the rationale for discounting. Green Belt sites have been discounted on principle. The South Warwickshire authorities consider that the City Council should undertake a full assessment of these sites for their potential suitability as employment sites, including those submitted to the Council as potential housing sites. It would not be reasonable to expect Warwickshire authorities to potentially have to release land in the Green Belt to meet Coventry's unmet employment need if the City Council has, as a matter of principle, not explored its own Green Belt land for strategic employment.

Whilst the South Warwickshire authorities support Coventry's brownfield land first approach, it appears that 3 out of 4 call for sites have solely been for brownfield sites. We would question therefore whether all potential sites, including greenfield sites and Green Belt land, have been appropriately and robustly# considered ahead of requesting neighbouring authorities to meet unmet need from the City.

In summary, the South Warwickshire authorities are happy to continue to engage in discussions regarding unmet need, however we would like more assurances relating to the robustness of the City Council's approach to fully exploring land within its own area. The South Warwickshire authorities may have land to accommodate some modest levels of additional employment, but we do not have sufficient infrastructure required to support such additional requirements and therefore it would be necessary for any exported need to be accompanied by sufficient resources to provide for these.

Other strategic matters

Policy GB2: Safeguarded Land in the Green Belt

We welcome the retention of safeguarded land in the Green Belt to the southern boundary of Coventry, acknowledging that the SWLP has not yet reached an advanced stage and therefore it would be premature to take any decisions with regards to allocation of that land.

Warwick District Council and Coventry City Council are partners, alongside Warwickshire County Council and University of Warwick on a project known as the North of Kenilworth – South of Coventry Masterplan Framework project. This project is looking at opportunities and challenges and how they may be addressed within the area to the north of Warwick District and south of Coventry. As part of that work, connectivity

and transport matters are an important consideration and the following comments are made in this context.

Policy DS4 (Part B) – Whitley Specific Masterplan Principles

We welcome point iv: Continue to maximise links and connectivity with surrounding business parks within both Coventry City and Warwick District to enhance the employment hub.

Whilst Whitley Business Park in Coventry and Whitley South, SEGRO Park and the Coventry Airport proposed Coventry & Warwick Gigapark site in Warwick District may not all be in the same administrative area, local infrastructure to support those developments must be coordinated and well connected for the benefit of the employment sites and their users, and also to provide benefits for local communities and mitigate the impacts of these employment sites to the wider public.

Bus, Demand Responsive Transit and Rapid Transit

Paragraph 12.47 of the consultation refers to the priority routes for the provision of high-quality Rapid Transit and the preceding paragraph, 12.46, states that the council's preferred way to deliver rapid transit is the Very Light Rail system.

As confirmed at a NokSoC Board Meeting on 4th February 2025 following a public statement made by the relevant City Council Portfolio Holder, the council is currently considering a route out to the Coventry & Warwick Gigapark (West Midlands Investment Zone) as the first main route for Very Light Rail. We would like to see specific reference to the Gigapark in the Local Plan as an extension to reference to the adjacent Whitley Business Park.