

Coventry Local Plan Review: Regulation 19 Publication Version December 2024 onwards.

Submission and comments on behalf of the Coventry and Warwickshire Growth Hub Ltd.

Introduction.

The Coventry and Warwickshire Growth Hub Ltd(CWGH) is a business support company established in 2014 . The Growth Hub is a government supported organisation offering advisory services to companies across the C&W sub region. As such the Growth Hub provides a “front door” to a wide range of business support initiatives and programmes that are offered locally and nationally. The Growth Hub employs a team of business advisors to work closely with local SME’s, inward investors and expanding businesses.

The Growth Hub seeks to engage with all the local authorities across the C&W sub region. It takes an active interest in the growth proposals and planning policies of the individual development plans. As such this Coventry Local Plan Review, Regulation 19 Publication December 2024 version of the plan ,hereafter referred to as “Regulation 19”,is of importance to the Growth Hub .In particular the Growth believes that the review provides the opportunity to encourage growth and supplement the range of business premises and land that is required.

Overall, the principle of a relatively focussed review that is put in place quickly is welcomed.

Specific Policy Comments

Policy DS1:Overall Development Needs

In terms of the provision of employment land, the Growth Hub considers that this key policy is unsound and it also appears to fail to comply with the Duty to Cooperate provisions as set out in national planning guidance.

The Councils draft policy does not seek to provide the estimated requirement for new employment land over the plan period as identified in the text (ref DS1(3)). This in effect undermines much of the economic vision and ambition set out in the Plan’s strategy as set out in the introduction for the draft plan and expressed through the One Coventry Plan 2022-2030. The Growth Hub considers that for some time the commercial market in Coventry has been characterised by shortages of suitable and affordable accommodation and land opportunities. The 2019 C&W Market Signals Report indicates that there are a range of shortages in key sectors of the local economy, in particular for smaller more affordable premises.

These Local Plan proposals will undermine the current local economy and hold back local growth. In view of how commercial markets operate, the absence of new allocations will impact across the whole market operation for the provision of land and buildings. In turn, both existing business and potential inward investment companies will continue to suffer the lack of choice and shortages of suitable premises, which as evidence suggests characterises the current commercial markets across Coventry. The CW Growth Hub is disappointed in the Councils overall approach to economic growth which appears to contradict many its stated objectives for creating a vibrant and growing local economy and the stated ambitions for the wider sub regional economy.

An alternative strategy based on a review of Green Belt boundaries would, in the opinion of the Growth Hub be able to identify sufficient land to meet the projected shortfall without compromising the key functions of the local green belt boundaries. Moreover, as an alternative there are strategic areas in the land immediately adjoining Coventry’s boundaries which could provide further alternatives to accommodate growth . This would require coordination and partnership working by all the local

authorities in C&W. This practical option to accommodate Coventry's growth does not appear to have been contemplated and properly examined.

Proposed Modification

The modification necessary to make this Policy sound will be for the Council to set out a commitment to provide all its employment land needs (as defined by Iceni study) within its boundaries or alternatively the Council should publish hard evidence jointly with its neighbouring authorities to explain how any "exported" growth can be accommodated both in locational and timing terms.

The draft plan must also address with more precision and detail the issue of how Coventry's share of the overall sub regional need is to be accommodated and brought forward within the plan period. Currently the strategic "big box" need calculated by Iceni is characterised by a very wide range between 136-311 ha across the sub region (para 5.14). This in the context of this plan needs to be narrowed down and much greater clarity provided.

Policy DS2 -Duty to Cooperate and Partnership Working

The sentiments set out in this policy framework are welcomed. We note the commitment of the City to partnership working but see little evidence to substantiate this draft policy as set out.

The lack of detailed information related to the Duty to Cooperate makes it difficult, if not impossible, to judge how this statutory obligation is being discharged in relation to Coventry and its sub regional neighbours. For this reason, the Growth Hub considers that the draft policy is not sound.

The draft policy DS2 relies heavily on the assumption that Coventry's unmet employment provision in relation to both strategic (large scale) and local employment provision will be located and accommodated in surrounding local authorities. However, having consulted several of the surrounding partner local authorities it appears that no formal agreements or related arrangements to make provision across local authority boundaries exist. The current NPPF (Dec 2024) strengthens the obligations in relation to Duty to Cooperate, cross boundary working and joint planning initiatives in relation to strategic planning. It suggests that building economic resilience depends on partnership working (para 24).

While the draft plan references an ambition to promote joint working and partnership working (including with the business community) the Growth Hub can see no evidence of how these objectives can be achieved or indeed what partnership work related to this policy framework has been jointly undertaken?

Proposed Modification

Unless the Council alters or supplements its position before deposit of the Plan, the Council should be directed to prepare a new joint working strategy that is transparent and reflects the status of whatever "on going work" (ref para 5.14) has taken place between the authorities. The updated version of the NPPF (Dec 2024) gives an invitation to the inspectorate at para 28 to take an "informed decision" on this matter in the event the Council does not flesh out the draft policy with more detail.

Policy JE1.Overall Economy and Employment Strategy

While the City Council has an ambitious growth agenda, the proposals themselves fail to meet projected employment need. Instead, as noted elsewhere they seek to effectively "export" economic growth to surrounding areas. Overall, the policy cannot be said to match the objectives that support it. For this central reason the policy is unsound.

Moreover, as noted above, the absence of any formal arrangements or specific information to accommodating the unmet need in surrounding areas suggests that the Council's stated approach is currently impossible to achieve within the timeframe to complete this local plan review.

This policy also seeks to provide a “*readily available range and choice of employment sites and premises to meet projected need over the plan period*.” It fundamentally ignores a body of evidence (for example the background studies undertaken by Icen, the C&W Market Signals Study of 2019, and the accumulated experience of the Growth Hub working with a wide range of clients) that highlights gaps in the existing provision of land and premises. By not adding in any new employment land allocations it compounds existing shortages across many types of land and premises. For example, freehold tenure smaller sites and business units available for small and expanding local businesses are in very high current demand and are in short supply in and around Coventry.

The proposed employment land provision relies substantially on allocations made in the 2017 adopted Local Plan. These sites have been slow to come forward and there is little evidence that the Council has been proactive in seeking to bring many of these sites forward. Moreover, there is no indication in the policy framework when the City Council thinks these sites may indeed come forward and contribute to a pool of readily available sites and premises.

Modifications proposed.

The Growth Hub believes that further work is needed to identify the 40ha of land that is currently not accommodated in the plan to meet local employment needs. This seems likely to require amendments to the Green Belt boundary. As noted above this can be achieved by a review of the boundary in Coventry and /or in the surrounding local authority areas under arrangements to work jointly.

Policy JE2: Provision of land and premises

The draft Policy is unsound because it fails to allocate sufficient land to meet the estimated requirements of 105 ha over the new plan period to 2041. Also it fails to adequately address in any detail how Coventry City proposes to deal the identified “strategic” need of 136-311ha of employment across the sub region. This is a very broad range of strategic employment provision and needs to be refined so that Coventry’s role in accommodating this growth is clarified. As the GH has argued above ,the Growth Hub disputes the City Council’s contention that it is unable to meet in full its needs. Taken together,these proposals threaten the long-term viability of the local economy.

The policy indicates that a “*balanced portfolio of employment land supply offering a choice of sites will be maintained*” suggesting that the proposals are bringing forward a portfolio offering these characteristics. This is not supported by the evidence.

The allocations set out in this Policy are sites originally allocated in the current adopted plan from 2017. There is no indication about effective timescales how the identified sites will come forward over the plan period. The sites listed do not seem to represent a broad spectrum of employment land, as is suggested. The sites at Eastern Green and Bagington Fields still have uncertainty related to their timing and contribution to a “readily available” supply over the plan period to 2041. It seems likely that both of these larger sites will continue to be delayed in coming forward and that they will not provide a wide enough range of land and premises to meet all requirements across the plan period

As noted, the draft policy also relies on “exporting” a residual 45ha Coventry’s growth yet provides no solid evidence of how this significant amount of land will be accommodated and implying that at some future date arrangements can be put in place to accommodate this employment land in surrounding local authority areas . There is no indication of timescales or indeed the potential locations for the distribution of the 45ha.

This contributes to making the draft policy unsound. In addition, as noted above (ref.) this overall lack of any detail or information undermines the way the Duty to Cooperate is approached in this draft plan .

Proposed Modifications

As noted in The Growth Hubs response above, remediation to address the deficiencies of this approach will require either modifications to oblige the Council to meet its full requirement within the City boundaries and/or a fundamental change to set out a clear and transparent partnership basis for distributing unmet employment needs to surrounding local authority areas. The latter route is more difficult because the development plans in the surrounding and adjoining local authorities are all at quite different stages in the plan process and do not share common timescales.

Policy JE3 Non-Employment Uses and Employment Land

The CW Growth Hub strongly supports the aim of this policy to retain as much employment land and premises. It is important to retain a range of properties that cater for all commercial sectors and which offer a range of prices and rents. The processes of market 'churn' and operation stem from having a range of land and premises that accommodate a variety of business types at a range of market prices and rents. It is important that the existing stock of land and premises are protected by policies that make it a challenging process to change properties to non-employment uses.

Proposed Modifications.

The policy should be strengthened by adding into the draft policy itself some of the provisions set out in the supporting text (for example 5.24) and lengthening the timescales suggested in the text for marketing of the property as an employment site. For example, the minimum marketing period should be extended to at least 12 months. In addition, there should be a requirement in the policy wording to identify that the site has been marketed at a realistic price considering the site characteristics, its previous uses, and its condition. The Policy should also include a requirement that the marketing process should be undertaken by agents with demonstrable track record and experience of working in the Coventry local market.

Policy GB1 Green Belt

The Growth Hub has set out in its responses that the failure to address and review the Green Belt around Coventry establishes a planning framework that will stifle future growth and the opportunities for economic expansion. The City Council has chosen to insist there are no land opportunities and ignore areas of land, albeit designated as green belt that are suitable to accommodate new commercial growth. Release of these areas would not compromise the long established functions of Green Belt.

There are important changes set out in the NPPF December 2024 in relation to the review of Green Belt. This new framework also introduces the concept of "Grey Belt" and this, if introduced, could offer considerable potential to bring forward smaller scale employment sites across the City. Instead the Council's approach in this review sets aside the government's ambitions to ensure Green Belt is reviewed.

Also as noted, a review of the Coventry Green Belt boundaries conducted alongside other surrounding local authorities, will also bring into play consideration of Green Belt boundaries adjoining the urban area of Coventry which are in surrounding local authorities. There is a missed opportunity here to promote greater joint working and to identify a set of practical solutions to meeting both local and strategic employment needs.

The Growth Hub has commented throughout this submission of the failure to provide any substantive information relating to the status of joint activities by all the local authorities related to partnership working and specifically to Duty to Cooperate provisions. This makes it difficult to comment on the exact balance between the true employment land capacity within the city boundaries and the potential to export some of that growth to surrounding areas.

Proposed Modifications

There should be a commitment before the plan review progresses further to review Green Belt boundaries in accordance with current national planning guidance. As noted this could be a review conducted within the City's boundaries or taken as part of a wider exercise involving the neighbouring local authority areas. The latter approach appears more likely to produce a set of long term defensible boundaries.

7.Appearance at Local Plan Examination.

In respect of the modifications suggested above regarding the range of policies identified, the Growth Hub wishes to participate in the examination hearing sessions.

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