



Coventry City Council

Coventry Local Plan Review

**Duty to Co-operate Compliance Statement
(submission)**

September 2025



Coventry City Council

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1. Introduction

- 1.1 The Duty to Co-operate (the ‘Duty’) is a legal and soundness test that requires cooperation between local planning authorities and other prescribed bodies to maximise the effectiveness of policies for strategic matters in Local Plans and Development Plan Documents. It was introduced by the Localism Act 2011¹ and is set out under Section 33A of the Planning and Compulsory Purchase Act 2004².
- 1.2 The National Planning Policy Framework (NPPF) reinforces the requirements of the Localism Act and provides further guidance on meeting the Duty to Cooperate. It emphasises the importance of joint working and maintaining effective cooperation between authorities and other prescribed bodies on cross-boundary issues and issues of shared interest. It should be noted that the plan has been prepared under the Transitional Arrangements set out in Annex 1 of the NPPF December 2024, meaning that it has been prepared, and will be examined under the previous iteration of the NPPF (December 2023).
- 1.3 This statement outlines how Coventry City Council (CCC) is managing the requirements of the Duty to Cooperate throughout production of the Coventry Local Plan Review. The Duty seeks to ensure a joined-up approach is taken in plan making, where collaborative working with other relevant organisations and bodies will deliver sustainable development within the Council’s administrative boundary and in the wider area.
- 1.4 This statement details the work undertaken to date and identifies how the Council is responding to the key strategic and cross boundary issues. Relevant planning issues identified for consideration under the Duty include the development or use of land that would have a significant impact on at least two planning areas (and in particular on strategic infrastructure). Accordingly, all local planning authorities are required to engage constructively, actively and on an ongoing basis when

¹ <https://www.legislation.gov.uk/ukpga/2011/20/contents>

² <https://www.legislation.gov.uk/ukpga/2004/5/contents>

preparing a local plan to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

1.5 In addition to Local Planning Authorities, the Town and Country Planning (Local Planning) (England) Regulations 2012³ sets out a list of Prescribed Bodies to whom the Duty applies. The names of some of these bodies have since changed so the list below reflects the most up to date position and does not include bodies which no longer exist (the Local Enterprise Partnership) or organisations which are not relevant to the plan. For Coventry, the relevant Prescribed Bodies are:

- The Environment Agency
- Historic England
- Natural England
- The Office of Rail and Road
- National Highways
- Transport for West Midlands
- Coventry City Council (highways)
- The NHS Coventry and Warwickshire Integrated Care Board
- Warwickshire, Coventry and Solihull Local Nature Partnership
- The Civil Aviation Authority
- Homes England

1.6 Whilst Planning Practice Guidance (PPG) makes clear that the Duty to Cooperate is not a duty to agree, LPAs should make every effort to secure the necessary cooperation on strategic cross boundary matters before submitting local plans for examination. The PPG also states that '*cooperation should produce effective and deliverable policies on strategic cross boundary matters.*' To demonstrate effective and on-going joint working, strategic policy-making authorities are required to prepare and maintain one or more statements of common ground documenting the cross-boundary matters and progress made through co-operatively addressing these.

³ <https://www.legislation.gov.uk/ukxi/2012/767/contents/made>

- 1.7 The NPPF notes that the examination of a local plan should include an assessment to identify if the plan has been prepared in accordance with legal and procedural requirements that include the Duty to Cooperate. Constructive co-operation is seen as an integral part of Local Plan preparation and should result in clearer planning policy outcomes capable of being demonstrated through the examination process.
- 1.8 As stated above **the Duty to Co-operate applies to the development or use of land that would have a significant impact on at least two planning authority areas**. This statement provides an overview of how the Council has complied with the Duty in regard to strategic planning matters. It focuses specifically upon the requirements of the Duty: it should be noted that the process of developing a Local Plan also requires engagement of a much wider range of stakeholders (including statutory consultees). This work has also been undertaken and is evidenced throughout the plan review documentation (including the consultation statement) but sits beyond the scope of this paper.
- 1.9 This paper sets out the process for engagement and the outcomes from collaborative working in terms of addressing strategic matters of relevance to the Coventry Local Plan Review, where these relate to at least two planning authority areas, and with whom the Council has engaged to address these matters.

2. Background

- 2.1 Coventry's approach to meeting the requirements of the Duty to Cooperate (DtC) is in full compliance with the regulations referenced in section 1. It is important that evidence of the DtC starts as early as possible and that regular constructive engagement continues throughout the plan-making process. It is important to show the outcomes of the engagement regarding the strategic cross boundary issues and how this has influenced the submitted Local Plan.
- 2.2 To support the production of the Coventry Local Plan Review and meet the requirements of the DtC, the Council is continuing its DtC work by working constructively in an ongoing and collaborative way primarily with the neighbouring Coventry and Warwickshire LPAs and relevant prescribed bodies. This is important because the process of plan making is constantly evolving and plans in neighbouring authorities are being produced to differing timescales.

Strategic Matters

- 2.3 The NPPF (2023 paragraph 20) outlines the key strategic issues where cooperation may be appropriate, these include, but are not limited to:
- Housing (including affordable housing), employment, retail, leisure and other commercial development.
 - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal management, and the provision of minerals and energy (including heat).
 - Community facilities (such as health, education and cultural infrastructure); and
 - Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

2.4 The main strategic matters in the context of the Duty to Co-operate being addressed through the Coventry Local Plan Review are:

- Meeting an appropriate level of employment need (including addressing a shortfall which cannot be met within the City Council's administrative area);
- Meeting an appropriate level of housing need;
- Transport and infrastructure matters;
- Environmental matters; and
- Minerals and waste issues.

2.5 It is the view of the Council that these strategic matters continue to be the principal cross-boundary issues to be addressed in the preparation of the Coventry Local Plan Review. Constructive engagement with neighbouring authorities is ongoing to resolve the continuing issue of unmet employment land needs which is explained later in this paper.

2.6 The NPPF (2023) goes on to provide further guidance in relation to the Duty to Cooperate (paragraphs 24 - 27), including the requirement for policy making authorities to prepare and maintain Statements of Common Ground (SoCG). The purpose of SoCG are to demonstrate that cross boundary strategic issues have been jointly addressed and how they will be progressed moving forward by the Local Authority, along with neighbouring authorities and prescribed bodies. Planning Practice Guidance (PPG) provides further detail on what is expected within SoCG.

2.7 This Duty to Co-operate Compliance Statement supports the submission version of the Coventry Local Plan Review, which addresses the following matters:

- The nature of the Duty and the policy and spatial context of the city in relation to its nearby authorities.
- A listing of the relevant Prescribed Bodies.
- A listing of the relevant 'strategic matters' affecting Coventry and the preparation of its Local Plan Review.

- The principles of cooperation developed and undertaken by the Coventry and Warwickshire Housing Market Area (HMA) and Functional Economic Market Area (FEMA).
- Details of all evidence base work and studies that have been commissioned on a joint basis with neighbouring authorities and other bodies.
- Details of engagement with neighbouring authorities on employment spatial distribution options and the matter of the employment shortfall.

2.8 The first iteration of the Duty to Co-operate paper was published at Regulation 19 stage⁴. It is important to note that all Duty to Co-operate bodies are included on the Council's consultation database and are kept informed of all consultations. This, of course is a bare minimum specifically relating to awareness raising rather than active co-operation. This paper therefore sets out how proactive engagement and resultant outcomes are achieved and /or remain ongoing.

2.9 A map of the main Duty to Co-operate geographical areas is included at **Appendix 1**.

⁴ <https://www.coventry.gov.uk/planning-policy/local-plan-review/4>

3. Engagement under the Duty to Co-operate

- 3.1 The following paragraphs show how the Council has engaged with relevant bodies under the Duty to Co-operate.

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

- 3.2 Coventry, Solihull and Warwickshire Local Planning Authorities have a long history of working closely and co-operatively together on cross boundary matters. Through the previous round of plan-making this included Memorandums of Understanding regarding delivery of housing and employment growth, particularly focused upon delivering housing and employment arising from Coventry which helped to inform Local Plan requirements across the sub region.
- 3.3 The Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) predates the duty to Co-operate and comprises Planning Policy Officers from Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford on Avon District Council, Warwick District Council, Warwickshire County Council and until recently Hinckley and Bosworth Borough Council (a Leicestershire authority but with links to the north of the area particularly relating to the A5 corridor). Since the introduction of the Localism Act in 2011, the CSWAPO group has taken the lead role in driving Duty to Cooperate discussions and related activities across the sub region.
- 3.4 CSWAPO meets monthly and is the primary body for the Council to work with its partners in determining what strategic issues need to be addressed and the outcomes needed to achieve this through the plan-making process. As a result of collaborative working through CSWAPO, the strategic issues and associated workstreams for the Coventry and Warwickshire area were determined to be:

- Growth Needs and Land Supply. This related to the Housing Market Area (HMA) and Functional Economic Market Area (FEMA), covering the Coventry and Warwickshire Local Authorities, but not Solihull or Hinckley and Bosworth which sit outside of this scope. (NB Hinckley and Bosworth are no longer regular attendees of CSWAPO having expressed a wish to only engage when required given that their strategic issues only relate to the northern parts of Warwickshire and they are not part of the HMA or FEMA). This workstream resulted in the production of the HEDNA (2022). It also resulted in the development of a shared methodology across the partner authorities for assessing sites, as referenced in the Housing and Economic Development Availability Assessment (HELAA). FEMA members have also worked together to produce an 'Alignment Report' (2024) on employment needs to ensure that the evidence base on strategic employment need produced by a wider partnership across the West Midlands (see section on the West Midlands Development Needs Group) aligns with the Coventry and Warwickshire HEDNA.
- Critical Infrastructure. This workstream related to energy and health infrastructure. This workstream resulted in presentations from relevant providers such as National Grid, to gain a broader understanding of how they planned for growth.
- Transport. This related to all CSWAPO local planning authorities and provided a mechanism for updating the local authorities on transport planning across the sub region.
- Water. This related to all CSWAPO local planning authorities and resulted in the production of the joint strategic Flood Risk Assessment (SFRA) (2022) and Water Cycle Study (WCS) (2024). This workstream also included active engagement with the Environment Agency and Severn Trent Water as well as the Lead Local Flood Authorities.
- Natural Environment. This related to all CSWAPO local planning authorities and resulted in the production of the updated Sub Regional Green Infrastructure Strategy (2024).

- 3.5 As evidence has been completed it was found that the original workstream groups had achieved their initial purpose (mainly regarding evidence base production) and others were duplicating joint working going on elsewhere. Therefore in March 2025 the groups were disbanded and instead it was determined that key strategic topics which reflected the priorities of the CSWAPO participants in relation to their own plan making processes would be as follows: Climate Change, Employment (local employment need and strategic), Environment, Growth, Housing (including Gypsy & Traveller accommodation particularly in relation to Rugby's needs), Strategic Infrastructure and Transport.
- 3.6 CSWAPO now co-ordinates all discussions as required and establishes task-specific meetings where a particular issue needs to be addressed. It should be noted that these changes occurred after Coventry's Regulation 19 consultation and therefore these are particularly relevant to the emerging plans of neighbouring councils who have not yet reached this stage in plan-making. Minutes of CSWAPO meetings can be seen at **Appendix 2**.
- 3.7 Specifically for Coventry, a series of discussions were held via a Duty to Co-operate CSWAPO sub-group given that wider CSWAPO membership sat beyond the HMA and FEMA and so was not relevant to all parties. This group was established and led by Coventry City Council for the following reasons:
- To establish and agree an appropriate level of housing need for the City
 - To establish and agree an appropriate level of employment need, to establish the level of shortfall, and to agree a mechanism for accommodating this
 - To produce a final signed Memorandum of Understanding (MoU) between the relevant parties reflecting the above points.
- 3.8 Minutes of the subgroup meetings held between September to November 2024 are attached at **Appendix 3**. These relate to the establishment of the housing need figure for Coventry, discussions on the Alignment Report establishing levels of employment need and thus from this the potential extent of the shortfall for Coventry, and the production of an updated MoU. This appendix also contains

correspondence with the relevant parties, formally requesting assistance with the shortfall, in the form of a letter sent out in February 2025 and responses received directly to that letter from Warwick District and Nuneaton Borough Councils (it should be noted that other parties did not respond directly to the letter but instead responded via their Regulation 19 representations).

- 3.9 Duty to Co-operate discussions have remained actively ongoing from this point onwards but have related specifically to refining the wording in the MoU. detailed in the next section.

Memorandum of Understanding – HMA and FEMA

- 3.10 As explained above, The Council has been leading on a MoU since September 2024 with the neighbouring local authorities within the CWHMA/FEMA (albeit discussion and early drafting had been underway previous to that date) . The MoU seeks to ensure that as the LPAs develop their Local Plans, at differing paces, the housing and employment needs of the CWHMA are met. It is framed within the Duty to Cooperate set out in Section 33A of the Planning and Compulsory Purchase Act 2004 and in the context of the NPPF. This sets out the duty for LPAs and county councils to cooperate in maximising the effectiveness of the preparation of development plan documents so far as relating to strategic matters which affect more than one local authority area.

- 3.11 The MoU sets out the areas where there is agreement between the parties (the level of housing need for Coventry) and where there are remaining matters yet to be resolved, which relate to the employment shortfall arising from Coventry and a request from Rugby Borough Council for a wide range of partners to assist with its Gypsy and Traveller need.

- 3.12 The MoU is attached at **Appendix 4** which also includes related correspondence to demonstrate active and constructive ongoing engagement. It has been signed by Coventry City Council, Nuneaton and Bedworth Borough Council, Warwick District Council and Rugby Borough Council. In terms of Stratford on Avon District

Council and Warwickshire County Council the appendix contains documented evidence of their clear intent to sign however due to internal governance processes it was not possible to achieve this prior to submission of the Local Plan. A final signed MoU will be submitted to the Examination as soon as possible.

3.13 In the case of North Warwickshire Borough Council, a report was presented to their Local Development Framework sub-committee on 1st July 2025 with an officer recommendation of approval to sign however Members determined not to sign until there was clarity as to how the shortfall is to be addressed. This is also included in Appendix 4 along with Coventry City Council's response.

3.14 The MoU is an overarching document. It should be noted that for the previous round of plan preparation for the authorities concerned, the MoU approach was effectively utilised to demonstrate co-operative working and therefore this approach has been carried forward, albeit in reality it serves as a sub-regional Statement of Common Ground, covering the matters cited in the PPG. The MoU states that it will be followed by a series of Statements of Common Ground with each party which address more localised nuances including progress on Local Plans in neighbouring areas. Because of the time taken to reach agreement with each partner authority on the wording of the MoU itself and the governance processes for sign off with each organisation, it has not been possible to finalise the individual SoCGs without causing significant delay to the submission of the Coventry Local Plan. These are in train as explained later in this section.

3.15 The key issue for Coventry is reaching agreement on the level of the shortfall and how this will be addressed. The Alignment Report (2024) has been accepted as the starting point for establishing the level of need and current supply and cites a residual local employment need of 45 hectares. Some FEMA authorities believe that Coventry can find more supply by including data on opportunities for the recycling / potential modernisation of sites and therefore in July 2024 Coventry City Council drafted an employment site recycling paper which was issued to the partners demonstrating a further potential supply and this is under discussion. Other matters remain in dispute such as the approach to Green Belt Review and the omission of a site in the Green Belt which is being promoted for

employment. The wider Strategic Need is also under discussion; however, Coventry does not have any sites of a sufficient scale (with the exception of the existing allocation at Baginton Fields) to be able to accommodate any of the strategic need identified in the evidence base (the West Midlands Strategic Employment Sites Study August 2024 and associated Alignment Report September 2024).

- 3.16 Nuneaton and Bedworth Borough Council are currently in examination on their plan review (having recently undertaken consultation on modifications between 2nd June to 14th July 2025) and had not been formally requested to assist with a shortfall when the plan was under development because the extent of this was not known at that time.
- 3.17 Rugby Borough Council consulted on its Local Plan Preferred Options between March and May 2025 and is currently undertaking further assessment work. Stratford on Avon and Warwick District Councils are jointly producing the South Warwickshire Local Plan (SWLP): Preferred Options was consulted on between January and March 2025. Both Rugby and the SWLP authorities had regard through their Local Plan consultations to the possible need to accommodate some of the shortfall subject to further understanding and agreement on the level of this.
- 3.18 North Warwickshire Borough Council is developing an Employment DPD and are working towards Regulation 18 of a Local Plan review therefore plans are in early stages of development.
- 3.19 Because of the different stages of plan-making and the differing views of the various parties on the matter of the extent of the shortfall and how it should be accommodated, Statements of Common Ground have been issued in draft to each of the HMA/FEMA parties. These were issued once those parties had either signed or stated clear intention to sign the MoU (or in North Warwickshire's case issued the decision not to sign). The dates of initial issue of the SoCGs are as follows:

- Nuneaton and Bedworth Borough Council 22 July 2025 (MoU signed 26th June 2025)
- Rugby Borough Council 28th July 2025 (MoU signed 28th July 2025)
- North Warwickshire Borough Council 5th August 2025 (Letter to CCC received on 31st July 2025 advising of decision not to sign MoU)
- Warwick District Council 18th August 2025 (MoU signed 15th August 2025)
- Stratford on Avon District Council 18th August 2025 (MoU signature awaited)

West Midlands Development Needs Group (WMDNG)

3.20 This Duty to Co-operate group initially began as a group addressing the needs of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). However, its scope has widened beyond that of the HMA, particularly in relation to addressing Strategic Employment needs and a range of other matters. It was by virtue of joint engagement on the production of West Midlands Strategic Employment Sites Study (WMSESS) 2024 that Coventry joined this forum.

3.21 The WDMNG comprises a broad scope of planning authorities across the West Midlands including the seven Metropolitan Authorities of Birmingham, Sandwell, Dudley, Walsall, Wolverhampton, Solihull and Coventry (these seven are also the Constituent Authorities of the West Midlands Combined Authority (WMCA)). It also comprises Local Authorities from Warwickshire, Shropshire, parts of Staffordshire and Worcestershire, as well as attendees from the West Midlands Combined Authority including Transport for West Midlands (TfWM). It meets monthly and remains a useful forum for engaging in activities across the wider region, and particularly so with the start of the production of the new Spatial Development Strategies albeit these are not directly applicable to the Local Plan Review due to the timescales involved.

West Midlands Regional Technical Advisory Body (WMRTAB)

3.22 The West Midlands Resource Technical Advisory Body (WMRTAB) is a group consisting of: Waste Planning Authorities (WPAs), primarily from the former West Midlands Region; representatives from the waste management industry; and other specialist parties including the Environment Agency, representatives of industry and environmental organisations.

3.23 WMRTAB meets twice a year and commits, through its annual business plan, to covering a range of strategic matters including monitoring the management of waste, identifying strategic matters in terms of its sustainable management, commissioning technical work, and formally responding, as a body, to the technical evidence base and policy documents of member authorities and other strategic and national consultations. Documentation regarding the collaborative approach to waste is included at **Appendix 5** which sets out the need to include updated information via the Infrastructure Delivery Plan and also the SoCG for WMRTAB which was signed by the City Council and others.

West Midlands Regional Aggregate Working Party (WMRAWP)

3.24 The West Midlands Regional Aggregate Working Party (WMRAWP) of which Coventry City Council is a member is established to identify issues of supply and demand, and the options for provision, pinch points, and relative significances to inform priorities for action. The WMRAWP considers, prioritises and sets action plans to address strategic issues relating to provision for their areas and dependent areas. Action plans should identify data needs, potential partners, dialogue/liaison and related research requirements. The WMRAWP assesses the compliance of Local Aggregate Assessments (LAAs) regarding adequacy of provision, but it does not engage in policy-making but considers and addresses key issues that relate to minerals supply and demand issues. It meets three times a year.

Prescribed Bodies

3.25 In terms of the Prescribed bodies, whilst all relevant bodies are actively encouraged to engage with the plan-making process the level of response and active engagement specifically through the Duty to Co-operate process is dependent upon the strategic matters which need to be addressed.

3.26 The following is a summary of where the Prescribed Bodies have been engaged. As stated previously, all relevant Prescribed Bodies are consulted to ensure awareness, with 'chase-up' correspondence, documented meetings and Statements of Common Ground where applicable.

The Environment Agency

3.27 The Environment Agency (EA) made representations to the Issues and Options consultation (Regulation 18). Comments which related to issues of a strategic matter included biodiversity, climate change, green (and blue) infrastructure and flood risk. The EA has been directly engaged in CSWAPO joint evidence base work (Flood Risk Assessment and Water Cycle Study) and is also directly engaged in strategic waste planning.

3.28 The EA made further representations at the publication stage (Regulation 19) and included specific points relating to the following key issues:

- Flood risk assessment in relation to new housing and employment allocations;
- Water quality and resources;
- Flood risk wording in relation to policy EM4; and
- Groundwater and contaminated land – protection of controlled waters.

3.29 Please note that each of these areas have been considered and explored through the signed Statement of Common Ground which now shows there are no outstanding areas of objection – please refer to **Appendix 6**.

Historic England

3.30 Historic England (HE) made representations to the Issues and Options consultation and further representations at the publication stage (Regulation 19) and included specific points relating to the following key issues:

- Further assessment work should be undertaken to identify all of the heritage assets affected by the potential site allocations;
- Understand what contribution each site makes to the significance of the heritage assets;
- Identify what impact the allocation may have on that significance;
- Consider maximising enhancements and avoiding harm; and
- Specific issues with a selection of proposed site allocations including iter alia: Walsgrave Hill Farm, Land at Sandy Lane, Coventry Central Police Station, New Union Street car park, the Allesley Hotel, City Centre South, Friargate.

3.31 Detailed discussions are underway with Historic England and as part of these the Council has agreed to undertake Heritage Impact Assessment of two proposed allocations: H2:30 (Whitefriars Car Park) and H2:32 (Dale Buildings), this work has been commissioned and will be completed by the end of September 2025. A Statement of Common Ground is under development, notes of meetings and relevant correspondence are included at **Appendix 7**.

Natural England

3.32 Natural England responded to the Regulation 19 Consultation on 3rd March 2025. In regard to the Duty to Co-operate their letter states: 'Natural England can confirm that the local plan largely incorporates the areas of Natural England's concerns such as: Water quality and quantity, air pollution, biodiversity and geodiversity, landscapes, both nationally designated and local landscape character, green infrastructure including priority habitat creation, climate change, soil, waste, strategic mitigation solutions and biodiversity net gain.'. There are therefore no Duty to Co-operate issues needing to be resolved.

The Office of Rail and Road (ORR)

3.33 Several attempts were made to engage with the office for Rail and Road albeit as can be seen from correspondence in **Appendix 8** however the main issues relate to more localised matters around the highways network. The ORR has been sent the relevant representations from Network Rail (who are not a DtC body, but in any case, in discussions with Network Rail they have confirmed they are content with some minor modifications) and from National Highways and Transport for West Midlands.

Transport for West Midlands

3.34 Discussions have been ongoing with TfWM, led by Coventry City Council's Highways team. A meeting was held to discuss the Local Plan on 30th January 2025 (**Appendix 9**) when the Regulation 19 consultation was live and TfWM submitted representations. No major issues have been raised and the Highways team continue to work collaboratively with TfWM to ensure that City Council transport planning aligns with the work of the wider region. Policies and supporting text have been updated to ensure that they reflect the latest position with a few minor modifications proposed post Regulation 19.

National Highways

3.35 Coventry City Council Highways team works closely with National Highways (NH) and discussions are ongoing. In specific regard to the Local Plan a meeting was held on 25th March 2025 (**Appendix 10**) specifically to discuss representations albeit the Highways team have much more regular dialogue with NH. The main issue in terms of the Local Plan was concerned with the modelling undertaken. CASM was used for the Local Plan as a more updated model was not available in time for Local Plan preparation timescales. NH agreed that they had always been engaged with the build of the modelling systems and were engaged with

the new CSMT model and how it would also be testing more recent changes in the area. Coventry Highways Team are working closely with NH on the revised modelling and a report should be produced in September 2025. An update will be provided to the Local Plan examination.

Warwickshire County Council Highways

3.36 Coventry City Council Highways team engage regularly with their counterparts at Warwickshire County Council on a range of matters including growth in the sub region. Minutes of the most recent meeting are attached at **Appendix 11** and as with National Highways the main issue is the report on the updated transport modelling (CSMT). An update will be provided to the examination once this report is finalised and has been considered.

The NHS Coventry and Warwickshire Integrated Care Board (ICB)

3.37 Coventry City Council works closely with the Coventry and Warwickshire Integrated Care Board (ICB), attending the Local Estates Forum on a regular basis and advising and discussing matters regarding a range of planning issues including the Local Plan Review, a review of the Health SPD, the delivery of infrastructure and S106 obligations. This ongoing collaborative working is reflected in the positive representations from the ICB to the Regulation 19 consultation, and no concerns regarding the Duty to Co-operate have been raised and meetings are ongoing to ensure that the Local Plan and its related Infrastructure Delivery Plan align with the ICB's own Infrastructure strategy.

3.38 There was a little confusion regarding the role of London-based NHS Property Services however this issue has now been resolved as set out in the minutes of a meeting held on 28th July 2025 (**Appendix 12**).

Warwickshire, Coventry and Solihull Local Nature Partnership (LNP)

3.39 The Local Nature Partnership did not make representations to Regulation 19 but was asked to provide a response in relation to its role under the Duty to Co-operate. The response can be seen at **Appendix 13** and primarily relates to the need for the Local Plan to ensure green infrastructure connectivity and to have regard to the emerging Local Nature Recovery Strategy, all of which the reviewed plan does. There are therefore no Duty to Co-operate issues in this regard.

The Civil Aviation Authority

3.40 The CAA has confirmed it has no Duty to Co-operate matters to raise. See **Appendix 14**.

Homes England

3.41 Homes England has been consulted at every stage of the Local Plan review, including specific chase-up emails examples of which are included at **Appendix 15**. They are not promoting any sites in Coventry, have made no representations and have made no response to any of the specific DtC requests to engage. It has therefore been concluded that there are no matters which need to be addressed under the DtC in this regard.

4. Strategic Issues

- 4.1 This section sets out how Duty to Co-operate partners are addressing the strategic issues to which the Duty applies.

Growth needs and land supply

- 4.2 CSWAPO partners have worked effectively together in commissioning a Housing and Economic Needs Assessment (HEDNA, 2022) with a base date of 2021, to inform plan making across Coventry and Warwickshire. This work determined that the appropriate HMA and FEMA related to Coventry, Nuneaton and Bedworth, Rugby, North Warwickshire, Stratford on Avon and Warwick administrative areas. This reflected the same HMA and FEMA geographies of the previous plan-making processes for CSWAPO authorities.

Housing

- 4.3 The HEDNA considered the overall scale of housing need, the demand for various types of homes, the dynamics within different sectors of the housing market, as well as the specific housing requirements of different population groups. Following a pause in the project, which allowed capture of initial Census data released on 28th June 2022 to inform demographic analysis and housing need modelling, the report was finalised in Autumn 2022.
- 4.4 The HEDNA therefore utilised the 2021 Census data, alongside other data, to develop a new trend-based projection for the Coventry and Warwickshire authorities. This approach was agreed by the HMA partners due to known significant inaccuracies for Coventry in terms of the demographic data inputs to the (then) calculations for the Standard Method for calculating housing need which led to over-inflated and incorrect figures for the city.

- 4.5 The review of Coventry's Local Housing Need was produced by Icení (June 2024) to ensure that the HEDNA remained an appropriate starting point for determining how much growth was appropriate for the City. This was discussed and the continued approach in using the HEDNA was agreed with partners.
- 4.6 In terms of which figure was to be used from the HEDNA Coventry has always been clear that it would be proceeding with the figure which reflected local need but did not include the 35% Cities Uplift (a figure set by the previous Government as part of the Standard Method) and would be robustly defending its decision on the basis that the HEDNA is an alternative method for calculating need, justified because the demographic data at the time used for the Standard Method was demonstrably wrong for Coventry. This approach has been agreed by the HMA partners.
- 4.7 Coventry has also discussed its housing supply position with HMA partners who support its brownfield-first, increased densification approach and its conclusion that it is able to accommodate its own housing need.

Employment Growth

- 4.8 As with Housing, the HEDNA was the starting point for assessing employment need. However, work was also ongoing across the wider West Midlands region in terms of assessing strategic site (i.e. 'big box') needs as this has different site and locational requirement to local employment provision. The West Midlands Strategic Employment Sites Study (WMSESS) was finalised in September 2024, the result of a partnership of those authorities engaging in the West Midlands Development Needs Group (WMDNG) referenced earlier in this paper, along with CSWAPO authorities who as a result of the strategic employment work became engaged with the WMDNG. This evidence sets out 'opportunity areas' for further exploration, and for Coventry this relates to 'Area 7' which will primarily relate to further joint working with Rugby Borough. Coventry is highly constrained and has no new sites which would meet the criteria set out in the study therefore discussions are ongoing as Rugby progresses its local plan.

- 4.9 Given the HEDNA had been finalised two years before the WMSESS was completed, those CSWAPO authorities in the FEMA commissioned an 'Alignment Report' to ensure consistency and provide up to date information to inform plan reviews. As well as producing an explanation as to how the HEDNA and WMSESS was aligned on strategic employment matters, the Alignment report also provided updated figures for local need.
- 4.10 On this particular issue, the total local need figure for Coventry for the period 2021-41 was calculated to be 105 hectares. From this Coventry had a supply of 60 hectares and a residual need of 45 hectares. Despite repeated Call for Sites, Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it has a shortfall. It has also made them aware that a Green Belt site (11 hectares developable to the east of the city) is being promoted but that it has been rejected through site assessment.
- 4.11 Discussions are ongoing through CSWAPO and with the linked duty to Co-operate Group and associated Local Authorities in regard to this matter, as set out in Section 3, but this currently remains an outstanding issue that has not yet been resolved. In part this is because most partner authorities are at earlier stages of plan preparation and assessment work is underway. This includes ongoing capacity work in Rugby, and assessment work in terms of further supply from recycling of sites in Coventry.

Site Assessment methodology

- 4.12 The CSWAPO authorities have also worked together on a shared methodology for assessing sites (February 2022) (**Appendix 16**). This was developed using the methodology in the Planning Practice Guidance but then provided further elaboration and guidance to reflect local context. Each partner authority has adopted this through their governance processes, for Coventry this was approved by Cabinet on 15th March 2022. This formed the basis for the Call for

Sites form and for the site assessment process (see the Coventry Housing and Economic Land Availability Assessment for further detail).

Critical Infrastructure

- 4.13 In terms of critical infrastructure the key strategic matters for Coventry and Warwickshire have been identified to be energy, and health (noting that other infrastructure matters including Green and Blue Infrastructure, Water and Transport are covered by different workstreams).
- 4.14 Energy generation and network distribution strategies are consulted on by the Energy Companies and Distribution Network Companies (Scottish and Western Power and National Grid). Presentations and discussion have been undertaken with CSWAPO to raise awareness of consultations and engagement and to ensure that the Companies are aware of strategic growth plans and respond to their consultations accordingly.
- 4.15 In terms of addressing health matters, these are addressed through engagement with the NHS Integrated Care Board as detailed in Section 3 rather than being a matter for CSWAPO.

Transport

- 4.16 The Council has regularly liaised with key transport infrastructure providers across the region (as set out in section 3) with a common recognition that there remain several challenges, including highways, parking, freight, rail, bus and active travel. There are also a number of opportunities that both the Council and the infrastructure providers have worked together to fully optimise, including Very Light Rail (VLR). At the same time there is a recognition that transport proposals can prove challenging to bridge the gap to Government targets and that an integrated approach to infrastructure investment and demand management is required to increase the pace of behavioural change.

- 4.17 The Council's Transport Planning Team have engaged on a regular basis with Warwickshire County Council, Highways England, Transport for the West Midlands, Network Rail and a range of other transport providers. The Local Plan Review has been a standing agenda item.
- 4.18 The Council is a Constituent Member of the West Midlands Combined Authority (WMCA) who have the statutory responsibility for producing a Local Transport Plan (LTP) for the whole region. There is an adopted Core LTP⁵ and there are a series of Area Strategies, which are still in development including an area strategy specifically for Coventry.
- 4.19 The Council has its own Transport Strategy, which was approved in 2022, but this is not a statutory document. It has been developed to align with the LTP and Local Plan policy has been developed in accordance with this. The Transport Strategy is a 15-year vision, accompanied by a more detailed Implementation Plan, which includes a pipeline of capital schemes. The Implementation Plan will be reviewed and updated regularly. Transport modelling evidence to inform the Local Plan has been prepared with engagement from neighbouring authorities.

Flood Risk and Water Resources

- 4.20 The CSWAPO Water Workstream has worked together to commission and oversee the development of the joint Coventry and Warwickshire Strategic Flood Risk Assessment (SFRA)⁶ and Water Cycle Study⁷ evidence base which have been published and are being used in the preparation of Local Plans. In addition to each Local Planning Authority, this workstream group has included the Lead Local Flood Authority (i.e. Coventry City Council & Warwickshire County Council) and active engagement from Severn Trent Water and the Environment Agency.

⁵ https://www.wmca.org.uk/media/1371/2016-06-01-mfg-summary-document_wmca.pdf

⁶ JBA Consulting Report

⁷ <https://www.coventry.gov.uk/downloads/download/8052/environmental-management>

Natural Environment

4.21 The Natural Environment Workstream has overseen the update of the Sub Regional Green Infrastructure Strategy which was finalised in 2024 and is being used to inform the Local Plan Review. The development and implementation of more localised Green and Blue Infrastructure Strategies and Action Plans has continued throughout the plan making period and it should also be noted that work is actively ongoing with the West Midlands Combined Authority to develop a Local Nature Recovery Strategy⁸ (draft for consultation between 15th August and 12th September 2025).

Minerals and Waste

4.22 As set out in section 3, minerals and waste strategic planning issues in Coventry, are considered and managed through two key partnership arrangements which include:

- (i) West Midlands Regional Technical Advisory Body - WMRTAB (waste)
- (ii) West Midlands Regional Aggregate Working Party – WMRTAB (minerals)

4.23 Coventry has been a long-standing member of the groups for many years and have fostered cooperative and positive working relationships with its partners across the wider West Midlands conurbation.

Waste

4.24 The WMRTAB meets twice a year covering a wide range of business matters as follows.

- Bring together a wide range of expertise in what is a very specialist area of planning through a wide membership including waste planning and management officers of the Waste Planning Authorities (WPAs) in the West

⁸ [West Midlands Local Nature Recovery Strategy](#)

Midlands, the Environment Agency, representatives of industry including the waste management industry, and representatives of environmental organisations;

- Monitor the management of waste arising within the West Midlands in order to identify strategic issues affecting its sustainable management e.g. waste hierarchy, proximity principle and self-sufficiency;
- Undertake and/or commission technical work where there are identified benefits from work being undertaken at larger than local scale;
- Prepare guidance and best practice to be followed by Member WPAs;
- Formally respond, as a body, to the technical evidence base and policy documents of member authorities and other strategic and national consultations⁹. Responses will be based on any guidance/best practice notes prepared by WMRTAB;
- Notwithstanding the above, provide comments on member WPA compliance with the Duty to Cooperate when its waste planning policy is published for representations;
- Raise awareness of waste management as an integral part of the circular economy/climate change agenda and contribute to the waste/resource management planning agenda on a national level and within the WMRTAB geographic area;
- Raise awareness of the role of WMRTAB generally e.g. by attendance at relevant meetings and events and also through the preparation of articles for relevant publications.
- Where invited, provide WMRTAB representation on groups and at workshops where strategic waste planning matters are discussed e.g. Local Enterprise Partnerships, West Midlands Combined Authority, National Waste TAB Chairs;
- Take part in online discussion/information sharing groups to help build skills and knowledge with the WMRTAB membership;
- Provide and/or commission training and support for Member organisations related to waste planning.

⁹ This will not fetter the ability of Member authorities to make their own representations as appropriate.

Minerals

4.25 The WMRAWP meets approximately 3 times a year covering a wide range of business matters which include:

(i) Presentation of primary aggregates data:

4.26 It should be emphasised that three factors hamper any analysis than in most other regions. Firstly, the considerable reduction in the number of active aggregate quarries over the last decade and secondly the rationalisation of company controls have limited the ability to present data in public to such a degree, that the ability to publish meaningful figures for provision is very limited indeed.

4.27 The third issue relates to the delay in conducting the regional returns. The dynamics of flows, particularly internally in the region, have certainly changed significantly in recent years, especially in response to quarry closures. Not only has the absence of such data rendered some of the LAAs out of date before their completion, for the reasons just mentioned, the output will almost certainly be too coarse to point up such changes and therefore to accommodate them.

(ii) Supplying the West Midlands Conurbation:

4.28 The most evident characteristic of the West Midlands supply/demand situation can best be described as a having a 'donut effect'. The dynamics within the region display tensions (actual or perceived) between the supplying and consuming areas – i.e. respectively, the ring of 'county' MPAs delivering most of the requirements of the urban core of metropolitan areas, where production of land-won material effectively ceased in the later 2000s. The key issues in relation to supply include, but are not limited to:

a) recovery of aggregates from Energy from Waste

- b) safeguarding remaining geological resources (including open land and brownfield sites)
- c) safeguarding rail transfer sites (existing and potential),
- d) insistence on greater levels of extraction prior to development (especially of brownfield sites) as comprehensive packages
- e) for any significant planned development, clear indication of the implications for aggregates demand and where it is not possible to meet such needs via the routes implied above, to be able to demonstrate that they have adequately discharged their Duty to Cooperate with other potential supply areas.

(iii) Measuring the recycled materials and secondary aggregates contribution:

4.29 There are several inherent and widely recognised challenges, which have been met through the interpretation of statistics collected by the Environment Agency. On the other hand, Warwickshire has demonstrated that, by developing a good rapport with operators, much better quality data (indicative but still partial) on Energy from Waste processing can be gathered.

(iv) Reliance on imports:

4.30 In net terms, the region is an importer of aggregates and has been for many years. The main reason historically is not necessarily related to an overall dearth of resources but rather reflects their distributional mismatch with respect to consuming areas.

4.31 More specifically it is a significant importer of rock, mainly from the East Midlands, but also from Wales, although it is in fact a small net exporter of sand and gravel, principally from Staffordshire. The decline of hard rock capacity in Warwickshire and to some extent the West Midlands Conurbation, was anticipated in the early 2000s by the East Midlands AWP but, in the context of the large permitted in Leicestershire, was not at the time specifically addressed. Since then, those resources appear to be coming under increasing pressure in the medium and longer terms, as their markets have broadened.

(v) Replacement provision for Peak District National Park:

4.32 The matter of winding down production in the Peak District National Park (ie a nationally endorsed policy) was in part accommodated by increased apportionment accepted by other MPAs in the East Midlands region. In practical terms, the impact is likely be minimal as there are significant unworked permitted limestone reserves in the county outside the Park and the existing operations concerned in the Park, mainly serve the West Midlands. Any inter-regional switch may need to be reflected in drafting any future guidelines prepared nationally.

(vi) Local Aggregates Assessment:

4.33 The Local Aggregates Assessment (LAA) for the West Midlands Metropolitan Area (WMMA) comprises seven unitary authorities:

- Birmingham City Council
- Coventry City Council
- Dudley Borough Council
- Sandwell Borough Council
- Solihull Borough Council
- Walsall Borough Council
- City of Wolverhampton Council

4.34 Each Metropolitan Area local authority is a mineral planning authority in its own right, however, unlike County Councils they do not prepare specific Minerals Local Plans, instead local plan policies address mineral planning matters. The LAA provides primary data from although some contextual information, for example local plan progress, is more contemporary.

4.35 Due to its built-up nature, workable sand and gravel deposits are limited in the WMMA and are mainly restricted to Solihull MBC, there are currently no workable crushed rock deposits.

5. Summary of Duty to Co-operate outcomes

5.1 The Council has undertaken a number of duty to cooperate discussions and exercises throughout the preparation of the Coventry Local Plan Review plan making process. These discussions have resulted in proposed suggested changes to the policies and proposals in the published Plan as part of the package of submitted documents. Where considered appropriate, Statements of Common Ground (SoCG) with relevant partners have and continue to be prepared as shown in table 1.

Table 1: Summary of Duty to Co-operate progress with relevant organisations on key issues

Organisation	Strategic Issue(s) Addressed	Status
Neighbouring Local Planning Authorities (including West Midlands Regional Technical Advisory Body (WMRTAB)).	<ul style="list-style-type: none"> ✓ Employment land need, supply, agreement on amount of shortfall and apportionment. ✓ Housing land supply and delivery ✓ Infrastructure – transport (CCC transport, TfWM, National Highways, WCC transport) ✓ Minerals and Waste planning at a regional and sub regional level ✓ Waste Needs Assessment ✓ Joint Statements of Common Ground – collective agreement on shared/joint working 	<p>CSWAPO Joint evidence base, joint MoU for the HMA and FEMA, agreement on housing, quantum and distribution of employment shortfall under active discussion, SoCGs under development. Appendices 1,2,3,4.</p> <p>Only outstanding issue is the updated transport modelling report due early September 2025, SoCG to be produced if necessary. Appendices 9,10,11.</p> <p>Policies agreed to be up to date, update IDP, ongoing collaboration Appendix 5 and Sections 3 & 4.</p>

Environment Agency	<ul style="list-style-type: none"> ✓ Flood risk assessment in relation to new housing and employment allocations; ✓ Water quality and resources; ✓ Flood risk wording in relation to policy EM4; and ✓ Groundwater and contaminated land and protection of controlled waters 	Issues addressed subject to modifications agreed between the parties. SoCG signed. Appendix 6
Historic England	<ul style="list-style-type: none"> ✓ Further assessment work should be undertaken to identify all of the heritage assets affected by the potential site allocations; ✓ Understand what contribution each site makes to the significance of the heritage assets; ✓ Identify what impact the allocation may have on that significance; ✓ Consider maximising enhancements and avoiding harm; and ✓ Specific issues with a selection of proposed site allocations 	Some wording modifications agreed, outstanding objections in regard to allocations H2:30 and H2:30, Heritage Impact Assessments being prepared (September) to be discussed with HE and final SoCG to be agreed (drafts and correspondence ongoing) Appendix 7.
Natural England	Confirmed no DtC issues	No issues
Office for Road and Rail – Network Rail, Transport for West Midlands and National Highways	The ORR has not identified specific issues: has asked to be kept informed on discussions with Network Rail, National Highways and TfWM	Appendix 8
Transport for West Midlands	No DtC issues to raise	Some minor wording modifications agreed. Appendix 9 and section 3
National Highways	Working with CCC transport team on the updated modelling through CSMT	Modelling report (Sept. 2025) will be reviewed and SoCG prepared if needed. Appendix 10.
Warwickshire County	No specific matters to raise and engaged on modelling updates.	As above Appendix 11

Council transport		
NHS Integrated Care Board	No DtC issues to raise supportive of the plan and ongoing co-operation via the ICB and Estates forum as stated in the Regulation 19 representations.	Some minor wording modifications agreed. Appendix 12
Warwickshire, Coventry and Solihull Local Nature Partnership	Want to see reference to the LNRS and green infrastructure links in the plan, which the reviewed plan already does. No specific issues raised in relation to DtC.	No modifications needed as the plan addresses issues. Appendix 13.
Civil Aviation Authority	No issues to raise under the DtC	Appendix 14.
Homes England	No responses received despite repeated efforts from CCC to engage.	Appendix 15.

5.2 A significant number of joint evidence base studies were prepared between 2022 and 2025 to support the Coventry Local Plan Review further demonstrating the significant and ongoing cooperation between the Councils neighbouring LPAs, including:

Minerals and Waste

- Resilience of Non-hazardous Residual Waste Management Capacity in the West Midlands, 2025
- West Midlands Aggregates Working Party Annual Report 2023

Housing and Employment

- Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA), 2022
- Review of Coventry's Local Housing Need, 2024
- West Midlands Strategic Employment Sites Study, 2024
- Coventry & Warwickshire HEDNA – WMSESS Alignment Paper, 2024

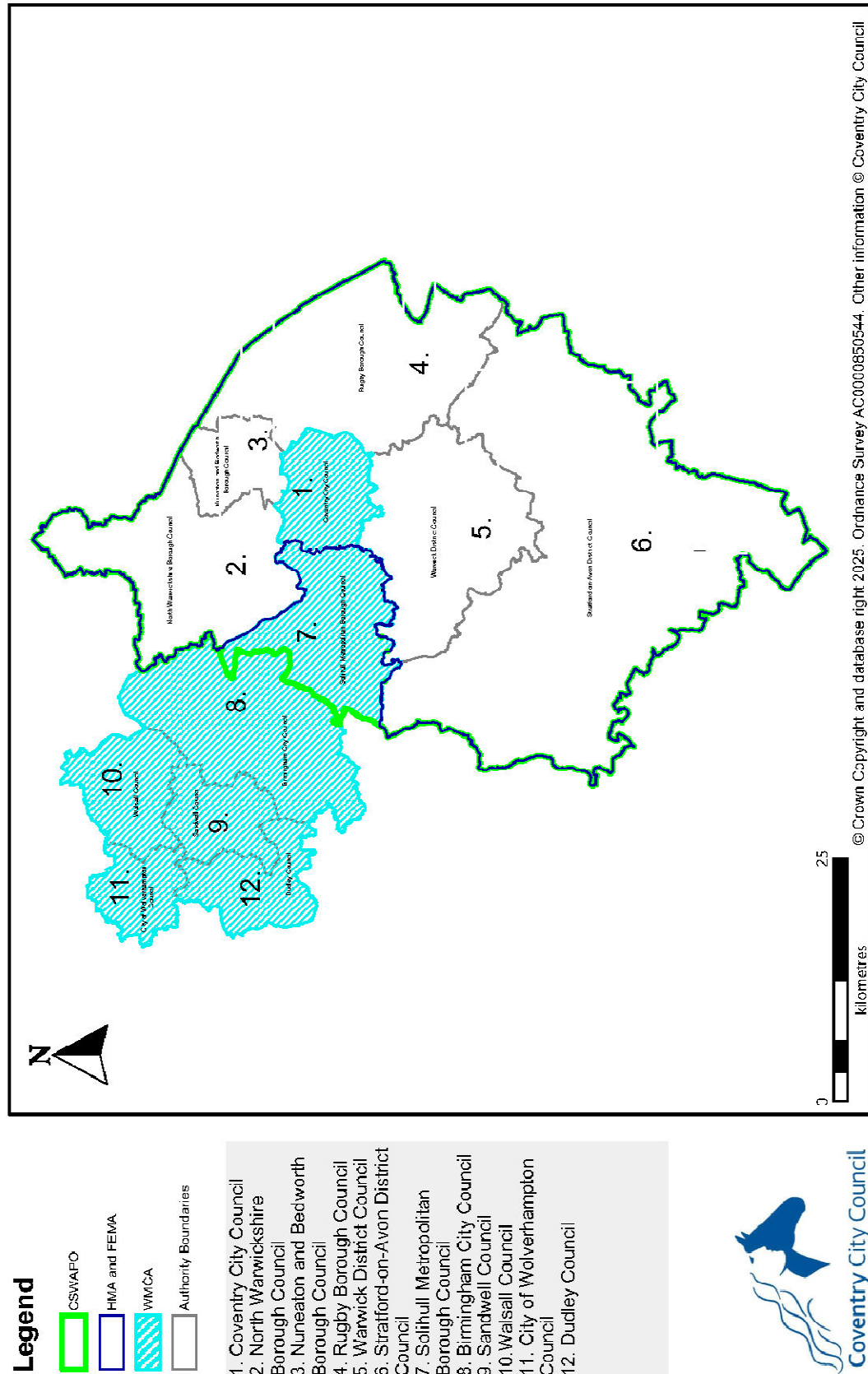
Environment

- Coventry and Warwickshire sub-regional Water Cycle Study, 2024
- Coventry and Warwickshire Strategic Flood Risk Assessment (SFRA), 2024

5.3 In conclusion, Coventry City Council considers that it has fully met its responsibilities in regard to the statutory Duty to Co-operate. The process does not stop once the plan is submitted, as discussions need to take place constructively, actively and on an ongoing basis not only in regard to the Coventry Local Plan but in regard to plan making in neighbouring areas. Updates will be provided accordingly to the Local Plan examination as necessary.

Appendix 1 Map of the Duty to Cooperate Area

Coventry City Council Duty to Co-operate Map



Appendix 2 CSWAPO Meeting Minutes



CSWAPO Minutes

Date: 11 January 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Rob Back	Coventry CC
Wendy Hague	Hinckley & Bosworth BC
Dorothy Barratt	North Warwickshire BC
Mike Dittman	North Warwickshire BC (part)
Maria Bailey	Nuneaton & Bedworth BC
Sarah Matile	Nuneaton & Bedworth BC
Peter Heath	Rugby BC
Maurice Barlow	Solihull
Joanne Bozdoganli	Stratford on Avon DC
Chris Egan (Chair)	Warwickshire CC
David Lowe	Warwickshire CC
Andrew Cornfoot	Warwick DC

Apologies:

Clare Eggington	Coventry CC
Neil Holly	Rugby BC

I

1. Introductions & Apologies	As above
2. Presentation by Dave Lowe on Ecological Issues	<p>DL gave a presentation on a number of ecological issues. He agreed to circulate the slides around attendees DL.</p> <p>DL requested all send him, preferably as shape files, all current site allocations. All.</p> <p>Sub-regional Green Infrastructure update</p> <p>DL took us through the proposed changes to this strategy, overall it will not be a radical update. It does not include an update to landscape character assessment, this was discussed with the Green Infrastructure sub-group but was rejected on grounds of cost. Biggest area of change will be around the annexes. One option was to update the biodiversity offsetting guidance while the other was to do this and set out guidance on ecosystem service trading protocol. This would cover biodiversity, carbon capture, air quality and water quality. This would be more ambitious</p>

	<p>document and would only really see results once markets have been established. DL is aiming to produce strategy update by end of Feb 23, subject to Govt guidance coming out this month. DB advised that it appeared more sensible to tie all these related issues together in one comprehensible package to keep approach as simple as possible.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>The consensus amongst the group was to pursue option 2.</p> <p>WH – would GI strategy go into H&B? DL advised currently it would not but could do so if the Warwickshire authorities were amenable to this change. On nutrient neutrality would this be based on a river catchment basis or administrative boundaries? DL advised he would use the same metric that defra use.</p> <p>DL is developing a Natural Capital Investment Strategy – which will set out how to spend biodiversity net gain contributions across the sub-region.</p> <p>DL has set up a natural capital team to help authorities develop appropriate local plan policies in their reviews.</p> <p>Environment Act 2021</p> <p>Duties regarding this act come into force at staggered times and DL will look to keep CSWAPO LAs informed when relevant elements come live.</p> <p>Certain parts of the legislation were enacted on 1/1/23 must now conserve and enhance biodiversity not just conserve it. Must produce a biodiversity report – details on this and its content have not yet been published.</p> <p>DB noted that as expertise in this area lies with County would like to negotiate with county to do this work, DL replied he would be happy to do so, subject to resources.</p> <p>AC asked that when DL has more information on this topic would he be happy to come back to us and discuss further. DL would.</p> <p>DL – now has staff to complete a sub-regional Great Crested Newt District level Licence application that will enable a simpler way of ‘dealing’ with GCNs in planning. This is why he needs the shape files.</p> <p>DL will find out in April what local nature recovery strategies will need to cover.</p>
3.	<p>Minutes of last meeting and matters arising</p> <ul style="list-style-type: none"> • Minutes agreed
4.	<p><u>CSWAPO Budget</u></p> <ul style="list-style-type: none"> • No update from last time. • Training from the TCPA was proposed at the last meeting however the TCPA was running a free training event in December. Some CSWAPO members attended. Richard to circulate link to the recording. Link to be recirculated by RB. RB
5.	<p><u>Joint Strategic Planning/Workstreams</u></p> <ul style="list-style-type: none"> • No update from last meeting. Can group members let Clare know who is representing them on these groups if they haven’t already done so. All.
6.	<p><u>HEDNA</u></p> <ul style="list-style-type: none"> • A number of authorities had received an identical EIR/FOI request. RBC would circulate their legal advice and material from Iceni once it had been received. PH/NH Those with pressing deadlines would issue the same response that they were waiting to hear from legal and would respond when they had heard back.

	<ul style="list-style-type: none"> The Hedna left the issue of future B8 provision at a sub-regional level. It was agreed that as part of the WMSESS study (see item 8) the consultants would be asked to recommend how the B8 figures in the hedna to 2041 and 2050 could be distributed amongst the authorities. RB was interested in knowing if hedna figures were already being used by hsg developers. This appeared to be a CCC issue only.
7.	<u>HELAA methodology</u> <ul style="list-style-type: none"> Adopted. Discussion on HELAA panels – no LAs in C&W area currently operate these as had found very low engagement rates. <i>Given that this has been adopted by all can this item be dropped as a standing item from agenda?</i>
8.	<u>Employment/Economy</u> <ul style="list-style-type: none"> DB (NWBC) represents CSWAPO on the group undertaking the WMSESS. A preferred consultant has been chosen but Dudley who are acting as lead will not release name or hold inception mtg until all 25 authorities are committed to providing their funding. The contract is due to run for 20 weeks from whenever the inception mtg occurs.
9.	<u>JMOG</u> <ul style="list-style-type: none"> Meeting due to take place in Feb, can colleagues confirm to Clare who will be representing them at JMOG – All. On issue of recruiting monitoring officers both WDC and WCC had success when they dropped the requirement to have a planning qualification.
10.	<u>WMCA</u> <ul style="list-style-type: none"> No update
11.	<u>Updates from each member organisation</u> <ul style="list-style-type: none"> Coventry – I&O paper for local plan due June 23. HMO DPD (Reg 19) to Cabinet in March. Householder Design SPD consultation underway. Hinckley and Bosworth – Looking at production of area wide design codes. North Warks – Open space and Waste SPD consultations complete now adopted. Gypsy and Traveller Allocations and Employment SDP/DPD's later this year. Nuneaton – Reg 19 to be pushed back to April. Gypsy and Traveller DPD examination – Inspector's report received discussing modifications with Inspector. Rugby – taking sustainable design spd to Council for adoption. Work on CiL paused for more viability evidence, G&T DPD attracted no sites so will need reconsideration by members. Solihull – Considering last response from Inspector.

	<ul style="list-style-type: none"> • Stratford on Avon - SWLP Issues and Options consultation (8 weeks) started on 9th January runs til 6th March. University of Warwick masterplan SPD, due to consult Feb. • WCC – No further updates. • Warwick - SWLP Issues and Options consultation (8 weeks) started on 9th January runs til 6th March. Net Zero Carbon DPD examination starts early March.
12.	<p><u>AOB</u></p> <ul style="list-style-type: none"> • AGM February – Coventry to chair and host, in-person event. Could colleagues attending the pre-AGM lunch please let Clare know so she can finalise numbers. All • Recent G&T definition decision – both Stratford and Leicestershire authorities had received same legal advice which was effectively to change nothing until heard from Govt about what it intends to do/issues new definition. • [REDACTED]
12	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>8 Feb 2023 Coventry (to include AGM).</p> <p>8 March 2023 North Warwickshire</p> <p>12 April 2023 Hinckley and Bosworth</p> <p>10 May 2023 Nuneaton</p> <p>14 June 2023 Rugby</p> <p>12 July 2023 Stratford on Avon</p> <p>9 August 2023 Warwick</p> <p>13 September 2023 Solihull</p>



CSWAPO Minutes

Date: 8 February 2023 (including the AGM)

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Rob Back (Chair)	Coventry CC
Clare Eggington	Coventry CC
Dorothy Barratt	North Warwickshire BC
Mike Dittman	North Warwickshire BC (part)
Jacqui Padbury	Nuneaton & Bedworth BC
Sarah Matile	Nuneaton & Bedworth BC
Neil Holly	Rugby BC
Maurice Barlow	Solihull
Joanne Bozdoganli	Stratford on Avon DC
Chris Egan	Warwickshire CC
Andrew Cornfoot	Warwick DC

Apologies:

Peter Heath	Rugby BC
Richard Thresh	Hinckley & Bosworth BC

1. Introductions & Apologies As above	
2. <u>CSWAPO AGM (see separate agenda)</u> Appointment of Officers The following appointments were agreed: <ul style="list-style-type: none"> Secretary – Coventry City Council Treasurer – Warwickshire County Council Chair - to remain rotating between the partners Treasurers Report Statement of Account had been provided by Chris Egan	

	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
3.	<p>Minutes of last CSWAPO meeting and matters arising</p> <ul style="list-style-type: none"> Minutes agreed
4.	<p><u>CSWAPO Budget</u></p> <ul style="list-style-type: none"> No update from last time. [REDACTED]. Opportunities for spending could be around NPPF training / planning reforms. [REDACTED] [REDACTED] Mike to set up meeting to discuss with Clare, Jo and Chris.
5.	<p><u>National planning reforms</u></p> <ul style="list-style-type: none"> All LPAs considering the implications and some had been to / were attending various roundtable sessions. SWLP and Coventry LP aiming to get their plans submitted under the 'old' system. Other LPAs considering options. Consultation deadline is 2nd March 2023.
6.	<p><u>Joint Strategic Planning/Workstreams</u></p> <ul style="list-style-type: none"> Updates were circulated from the water and growth themes.
7.	<p><u>HEDNA</u></p> <ul style="list-style-type: none"> Warwickshire authorities (housing departments) are considering whether they need more detail on housing needs, meeting being held on 17th February. There was a discussion on whether the HEDNA would suffice for Local Plan purposes. All to review and feed back. Coventry requested they were also involved in the discussions (as current discussion with housing services is Warwickshire-focused).
8.	<p><u>Employment/Economy</u></p> <ul style="list-style-type: none"> DB represents CSWAPO on the group undertaking the WMSESS. A preferred consultant has been chosen The contract is due to run for 20 weeks from whenever the inception mtg occurs. Need to consider links with the transport group. There was a discussion on hot food takeaway policy – Nuneaton had successful defended theirs at appeal (concentrations).
9.	<p><u>JMOG</u></p> <ul style="list-style-type: none"> Meeting due to take place on 15th February
10.	<p><u>WMCA</u></p> <ul style="list-style-type: none"> No update

11.	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – I&O paper for local plan due June 23. HMO DPD (Reg 19) to Cabinet in March. • Hinckley and Bosworth – Looking at production of area wide design codes. • North Warks – Open space and Waste SPD consultations complete now adopted. Gypsy and Traveller Allocations and Employment SDP/DPD's later this year. • Nuneaton – Reg 19 to be pushed back to April. Gypsy and Traveller DPD examination – Inspector's report received discussing modifications with Inspector. • Rugby – taking sustainable design spd to Council for adoption. Work on CiL paused for more viability evidence, G&T DPD attracted no sites so will need reconsideration by members. • Solihull – Considering last response from Inspector. • Stratford on Avon - SWLP Issues and Options consultation (8 weeks) started on 9th January runs til 6th March. • WCC – No further updates. • Warwick - SWLP Issues and Options consultation (8 weeks) started on 9th January runs til 6th March. Net Zero Carbon DPD examination starts early March.
12.	<p><u>AOB</u></p> <ul style="list-style-type: none"> • There was a discussion on Coventry HMO DPD and whether it was a non strategic issue which would not require a Statement of Common Ground (as per the National Planning Practice Guidance). Generally it was felt likely this was the case, and there would be a further discussion once the Regulation documentation was in the public domain. Warwick District requested a further discussion given that both authorities have student accommodation • There was a discussion around whether the Green Belt study needed updating. It was decided to see what the Government does with the NPPF consultation first.
13	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>8 March 2023 North Warwickshire</p> <p>12 April 2023 Hinckley and Bosworth</p> <p>10 May 2023 Nuneaton</p> <p>14 June 2023 Rugby</p> <p>12 July 2023 Stratford on Avon</p> <p>9 August 2023 Warwick</p>

13 September 2023 Solihull

11 October 2023 Coventry



CSWAPO Minutes

Date: 8 March 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Rob Back	Coventry CC
Clare Eggington	Coventry CC
Dorothy Barratt (Chair)	North Warwickshire BC
Mike Dittman	North Warwickshire BC (part)
Sarah Matile	Nuneaton & Bedworth BC
Neil Holly	Rugby BC
Maurice Barlow	Solihull
Joanne Bozdoganli	Stratford on Avon DC
Chris Egan	Warwickshire CC
Adam James	Warwick DC
Richard Thresh	Hinckley & Bosworth BC

Apologies:

Andrew Cornfoot	Warwick DC
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1.	Introductions & Apologies As above
2.	Minutes of last CSWAPO meeting and matters arising <ul style="list-style-type: none"> Minutes agreed
3.	<u>CSWAPO Budget</u> <ul style="list-style-type: none"> DB had been to a PAS conference regarding planning reforms so may need this budget for shared evidence / projects once we know what these changes are in detail
4.	<u>National planning reforms</u> <ul style="list-style-type: none"> All LPAs considering the implications – this to be a standing item

5.	<p><u>Joint Strategic Planning/Workstreams</u></p> <ul style="list-style-type: none"> • Critical infrastructure – Mike advised need to ensure they are responding to relevant consultations. Water resources management plan consultation for 2024 is now out - focus on water supply. Need to look at as a group and co-ordinate response. Need clarity from Jacqui in terms of how the Water group fits into this. Sarah to speak to Jacqui • Green Infrastructure group – needs an update from David Lowe • Transport group – needs to meet <p>To dedicate a future CSWAPO meeting to the progress of the workstreams and invite the leads to attend to present where they have got to and raise any issues. Clare to speak to workstream leads.</p>
6.	<p><u>HEDNA</u></p> <ul style="list-style-type: none"> • Correction needs to be made to the strategic employment land figures. There is a discrepancy between Table 10.18 and 10.19. [REDACTED] [REDACTED] [REDACTED] [REDACTED] Neil has asked Iceni to correct this and reissue the report. • Strategic B8 employment figure can't be disaggregated – need to discuss once the WM strategic sites study is complete. SWLP needs to understand timelines and how this work fits in • Housing needs- being considered at Warwickshire Heads of Housing meeting 31st March – it is anticipated that each LA's Housing lead will report back to the respective Policy Team after this date. SDC policy team has indicated it would like to progress and recommend other provide a similar internal steer if not already done so. Coventry CC is not involved in this meeting so requested an update once the meeting had happened as may also wish to join. Jo to update Clare after the meeting
7.	<p><u>Employment/Economy</u></p> <ul style="list-style-type: none"> • DB represents CSWAPO on the group undertaking the WMSESS. The consultants had asked for data to be submitted asap. Draft due late summer 2023 •
8.	<p><u>JMOG</u></p> <ul style="list-style-type: none"> • Meeting held on 15th February, minutes circulated • Need to look at the work JMOG does – at present it's a data reporting exercise but could it be doing more? Eg E Mids Transport. We need to co-ordinate better across C&W – potential support from WCC and Coventry CC Insights team – Clare / Rob and Chris E to explore
9.	<p><u>WMCA</u></p> <ul style="list-style-type: none"> • Need to understand what theme groups they have and how these fit in to the sub regional planning agenda • Invite WMCA to present to future meeting

10.	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – I&O paper for local plan due June 23. HMO DPD (Reg 19) to Cabinet in March. • Hinckley and Bosworth – Refreshing evidence base currently. Looking at production of area wide design codes. • North Warks – Open space and Waste SPD now adopted. Gypsy and Traveller Allocations and Employment SDP/DPD's later this year. • Nuneaton – Reg 19 to be pushed back to April. Gypsy and Traveller DPD examination – Inspector's report received discussing modifications with Inspector. • Rugby – sustainable design SPD adopted. Work on CiL paused for more viability evidence, G&T DPD attracted no sites so will need reconsideration by members. • Solihull – Exchanges with Inspector ongoing, pause has been suggested until NPPF consultation is finalised • Stratford on Avon - SWLP Issues and Options consultation (8 weeks) started on 9th January ran til 6th March. Out to consultation on SW economic strategy, and Wellesbourne campus SPD • WCC – No further updates. • Warwick - SWLP Issues and Options consultation (8 weeks) started on 9th January ran til 6th March. Net Zero Carbon DPD examinations hearing sessions taking place this week. Two SPDs - Leamington Old Town and joint University of Warwick SPD with Coventry CC
11.	<p><u>AOB</u></p> <ul style="list-style-type: none"> • HBA – LPAs have been approached for renewals. Stratford looking to use next years contribution to update the baseline. Worth considering the merits of having up to date baselines across the county - all to consider and report back • Neil advised he'd had some discussions with CCC transport regarding cross boundary implications where Coventry and Rugby will need to work together to deliver • Dorothy was interested in Zip Car scheme and car club being developed by WCC and how it could be developed across a wider area
12.	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>12 April 2023 Hinckley and Bosworth</p> <p>10 May 2023 Rugby</p>

14 June 2023 Nuneaton

12 July 2023 Stratford on Avon

9 August 2023 Warwick

13 September 2023 Solihull

11 October 2023 Coventry

8 November 2023 North Warwickshire



CSWAPO Minutes

Date: 12 April 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Richard Thresh (Chair)	Hinckley & Bosworth BC
Clare Eggington	Coventry CC
Dorothy Barratt	North Warwickshire BC
Mike Dittman	North Warwickshire BC
Sarah Matile	Nuneaton & Bedworth BC
Neil Holly	Rugby BC
Maurice Barlow	Solihull
Joanne Bozdoganli	Stratford on Avon DC
Chris Egan	Warwickshire CC
Andrew Cornfoot	Warwick DC

Apologies:

Maria Bailey	Nuneaton & Bedworth BC
Chris Styles	Coventry CC

1.	Introductions & Apologies As above
2.	Minutes of last CSWAPO meeting and matters arising <ul style="list-style-type: none"> Minutes agreed
3.	<u>CSWAPO Budget</u> <ul style="list-style-type: none"> Two suggestions were made: technical monitoring evidence in relation to the MoUs as proposed by PAS in their 2021 paper to CSWAPO '<i>Taking Forward a Strategic Planning Approach: strategic evidence base programme & spatial options 2021</i>' (see further discussion under JMOG item), and potential evidence to support climate change evidence (see later discussion under 'workstreams').

4.	<p><u>National planning reforms</u></p> <ul style="list-style-type: none"> • NPPF – consultation outcome anticipated ‘spring 2023’ • Various other consultations – Infrastructure Levy, Environmental Outcomes etc.
5.	<p><u>Joint Strategic Planning/Workstreams</u></p> <ul style="list-style-type: none"> • Critical infrastructure – Water resources management plan consultation and water cycle study work to sit with the water group • Water group see above • Green Infrastructure group – David Lowe is awaiting a further steer re consultations on national policy to ensure evidence is up to date. • Transport group – needs to meet, Clare and Chris (Styles) are meeting with the chairs to discuss. • Growth group – now needs to be focusing on issues relating to the implementation of the HEDNA etc (Rugby chair) <p>There was a discussion about whether the role and function of the groups needs a review, eg climate change should be more explicit, suggested that evidence is needed with a narrow focus, to understand viability - influences on build cost and viability in relation to net zero that goes beyond building regs. (Warwick DPD assumed 3% cost uplift for residential, 6% on non residential). Bath and NE Somerset and Cornwall net zero policies were found sound.</p> <p>Next meeting – need to review the PAS paper <i>Taking Forward a Strategic Planning Approach: strategic evidence base programme & spatial options 2021</i> to see whether updates needed.</p>
6.	<p><u>HEDNA and MoU</u></p> <ul style="list-style-type: none"> • NBBC had circulated a draft MoU (housing) for comment – aiming to consult on Reg 19 September 2023. Initial comments / thoughts to Sarah by Friday 28th April • HEDNA – Corrected version of the HEDNA had been circulated by Neil. • Discussion around how to manage the annual affordability data. [REDACTED] [REDACTED] [REDACTED] [REDACTED] • [REDACTED]
7.	<p><u>Employment/Economy</u></p> <ul style="list-style-type: none"> • DB represents CSWAPO on the group undertaking the WMSESS. The consultants had asked for data to be submitted asap. Stakeholder engagement just starting. Draft due late summer 2023 • [REDACTED]
8.	<p><u>JMOG</u></p> <ul style="list-style-type: none"> • Meeting held on 15th February, minutes circulated at previous meeting • Need to look at the work JMOG does – at present it’s a data reporting exercise but needs to do more - potential support from WCC and Coventry CC Insights

	team had been investigated but response, needs to be chased up – Clare / Chris E
9	<p><u>Gate Two strategic water resource proposals and solutions 2023</u></p> <ul style="list-style-type: none"> MD had sent a note (as a result of discussion with the water workstream group) – OFWAT consultation, potential to impact on C&W area. The EA has raised concerns already, but there is an opportunity to make reps by 11th May. WCC to be made aware.
10.	<p><u>WMCA</u></p> <ul style="list-style-type: none"> Need to understand what theme groups they have and how these fit in to the sub regional planning agenda Invite WMCA to present to future meeting
11.	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> Coventry – I&O paper for local plan due June 23. HMO DPD (Reg 19) to Cabinet in March. Hinckley and Bosworth – Refreshing evidence base currently. Looking at production of area wide design codes. North Warks – Open space and Waste SPD now adopted. Gypsy and Traveller Allocations and Employment SDP/DPD's later this year. Nuneaton – Reg 19 to be pushed back to April. Gypsy and Traveller DPD examination – Inspector's report received discussing modifications with Inspector. Rugby – sustainable design SPD adopted. Work on CiL paused for more viability evidence, G&T DPD attracted no sites so will need reconsideration by members. Solihull – Exchanges with Inspector ongoing, EiP paused until NPPF consultation is finalised Stratford on Avon - SWLP Issues and Options consultation (8 weeks) started on 9th January ran til 6th March. Out to consultation on SW economic strategy, and Wellesbourne campus SPD WCC – No further updates. Warwick - SWLP Issues and Options consultation (8 weeks) started on 9th January ran til 6th March. Net Zero Carbon DPD examinations hearing sessions held in March. Letter from Inspector followed – indicated main mods needed but clarification awaited. Two SPDs - Leamington Old Town and joint University of Warwick SPD with Coventry CC

12.	<p><u>AOB</u></p> <ul style="list-style-type: none"> • Clare sends apologies for next meeting, Neil offered to take the notes. • Everyone sent their best wishes to Peter Heath who is leaving Rugby to take up a new role, and thanked him for all he had done for CSWAPO.
13	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>10 May 2023 Rugby</p> <p>14 June 2023 Nuneaton</p> <p>12 July 2023 Stratford on Avon</p> <p>9 August 2023 Warwick</p> <p>13 September 2023 Solihull</p> <p>11 October 2023 Coventry</p> <p>8 November 2023 North Warwickshire</p> <p>6 December 2023 Hinckley and Bosworth</p>



CSWAPO Minutes

Date: 10 May 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Neil Holly (Chair)	Rugby BC
Richard Thresh	Hinckley & Bosworth BC
Maurice Barlow	Solihull MBC
Chris Styles	Coventry CC
Pierre Cross	Coventry CC
Mike Dittman	North Warwickshire BC
Sarah Matile	Nuneaton & Bedworth BC
Maria Bailey	Nuneaton & Bedworth BC
Joanne Bozdoganli	Stratford on Avon DC
Andrew Cornfoot	Warwick DC

Apologies:

Dorothy Barratt	North Warwickshire BC
Clare Eggington	Coventry CC
Chris Egan	Warwickshire CC

1.	Introductions & Apologies As above
2.	Minutes of last CSWAPO meeting and matters arising <ul style="list-style-type: none"> Minutes agreed with minor amendment
3.	<u>CSWAPO Budget</u> <ul style="list-style-type: none"> Two suggestions were previously made: technical monitoring evidence in relation to the MoUs as proposed by PAS in their 2021 paper to CSWAPO '<i>Taking Forward a Strategic Planning Approach: strategic evidence base programme & spatial options 2021</i>', and potential evidence to support climate change evidence (see attached note from Neil). On Climate change evidence: CSWAPO-wide viability evidence for climate change policy was agreed to be unworkable. WDC and SDC are jointly commissioning Arup to prepare climate change evidence. This will include renewable energy locations. Jo to circulate key parts of the brief. We should avoid duplicating that

	<p>across the CSWAP0 area. Joint evidence on energy efficiency options and costs remains an option, but South Warwickshire authorities would need to take a view on this to avoid duplicating existing evidence.</p> <ul style="list-style-type: none"> • NWBC to prepare scope for monitoring study to be discussed at next meeting.
4.	<p><u>National planning reforms</u></p> <ul style="list-style-type: none"> • Latest intel is that new NPPF expected end of summer/early autumn.
5.	<p><u>Joint Strategic Planning/Workstreams</u></p> <ul style="list-style-type: none"> • Critical infrastructure – no current need for consultant work. National Grid to be send HEDNA so that they have an idea on direction of travel. • Water group – water capacity, water supply and sewer capacity will be dealt with in Water Cycle Study. • Green Infrastructure group – GI refresh draft expected. Mike to forward update • Transport group – meeting now scheduled for 17 May at 3pm • Growth group – no meeting held <p>Next meeting – need to review the PAS paper <i>Taking Forward a Strategic Planning Approach: strategic evidence base programme & spatial options 2021</i> to see whether updates needed.</p>
6.	<p><u>HEDNA and MoU</u></p> <ul style="list-style-type: none"> • NBBC had circulated a draft MoU (housing) for comment – aiming to consult on Reg 19 September 2023. NBBC have received comments from RBC, CCC, WDC, SDC, NWBC. Sarah is collating comments and will supply an updated version. • It was agreed that WCC should be party to the MOU if they are able to be. • Chief Execs to be made aware of MOU negotiations. • Clare to produce note (in discussion with others) as to what is needed in terms of annual statement with updates to HEDNA numbers based on affordability data. • The previous housing MOU was, to the best of the recollection of those working in the area at the time, agreed by the joint committee but not signed by the individual authorities. • RBC raised issue of unmet Gypsy and Traveller need. NWBC face similar issue and intend to do an issues and options consultation. Previously there was county-wide work being done by WCC but that doesn't seem to be continuing. NWBC have a 2019 GTAA. Stratford and Warwick have jointly commissioned a GTAA which is being prepared. Draft finding show no need for WDC but high need for SDC. Coventry GTAA Feb 2023 shows a low need for only 6 pitches. NBBC Gypsy and Traveller DPD progressing. RBC, NWBC and SDC likely to have high unmet need. Agreed a coordinated approach would be beneficial. Neil to set up a separate meeting on this with relevant WCC officers to attend.

	Coventry estates team to also be invited and Chris to advise who relevant person to invite is. Sarah to see if she can supply relevant contacts for WCC G&T liaison officer
7.	<u>Employment/Economy</u> <ul style="list-style-type: none"> DB represents CSWAPO on the group undertaking the WMSESS. Early outputs indicate there is going to be a significant shortfall. 800-1000ha potentially across the West Midlands
8.	<u>JMOG</u> <ul style="list-style-type: none"> No update
9.	<u>WMCA</u> <ul style="list-style-type: none"> SDC have expressed interest on being on the local authority working group for the Plan for Growth and the Energy Capital working group Invite WMCA to present to future meeting
10.	<u>Updates from each member organisation</u> <ul style="list-style-type: none"> Coventry – I&O paper for local plan due June 23. HMO DPD (Reg 19) to Cabinet in March. Hinckley and Bosworth – Refreshing evidence base currently. Looking at production of area wide design codes. North Warks – Open space and Waste SPD now adopted. Gypsy and Traveller Allocations and Employment SDP/DPD's later this year. Nuneaton – Reg 19 to be pushed back. Gypsy and Traveller DPD examination – Inspector's report received discussing modifications with Inspector. Rugby – no further updates. Solihull – Exchanges with Inspector ongoing, EiP paused until NPPF consultation is finalised Stratford on Avon - SWLP Issues and Options consultation (8 weeks) started on 9th January ran til 6th March. WCC – No further updates. Warwick - SWLP Issues and Options consultation (8 weeks) started on 9th January ran til 6th March. Net Zero Carbon DPD examinations hearing sessions held in March. Letter from Inspector followed – indicated main mods needed but clarification awaited. Main mods consultation may start before next CSWAPO meeting.

11.	<p><u>AOB</u></p> <p>None</p>
12	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>14 June 2023 Nuneaton</p> <p>12 July 2023 Stratford on Avon</p> <p>9 August 2023 Solihull</p> <p>13 September 2023 Warwick</p> <p>11 October 2023 Coventry</p> <p>8 November 2023 North Warwickshire</p> <p>6 December 2023 Hinckley and Bosworth</p> <p>10 January 2024 Rugby</p>



CSWAPO Minutes

Date: 14 June 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Sarah Matile (Chair)	Nuneaton & Bedworth BC
Maurice Barlow	Solihull MBC
Clare Eggington	Coventry CC
Mike Dittman	North Warwickshire BC
Matthew Neal	Stratford on Avon DC
Andrew Cornfoot	Warwick DC
Chris Egan	Warwickshire CC
Richard Thresh	Hinckley & Bosworth BC
Jade Bagley	Nuneaton & Bedworth BC

Apologies:

Dorothy Barratt	North Warwickshire BC
Joanne Bozdoganli	Stratford on Avon DC
Chris Styles	Coventry City Council
Neil Holly	Rugby BC
Maria Bailey	Nuneaton & Bedworth BC

1.	<u>Introductions & Apologies</u> As above
2.	<u>Minutes of last CSWAPO meeting and matters arising</u> <ul style="list-style-type: none"> CE sought clarification on item 6 4th bullet '<i>Clare to produce note (in discussion with others) as to what is needed in terms of annual statement with updates to HEDNA numbers based on affordability data</i>'. Confirmed that this forms part of the monitoring paper which had been circulated prepared jointly with NWBC. GTAA actions queried – separate item on this agenda The AOBs need removing as they had been left on from a previous meeting
3	<u>National Planning reforms</u> – standing item, no further update as yet

4.	<p><u>Joint Strategic Planning/Workstreams</u></p> <ul style="list-style-type: none"> • Critical infrastructure – no further update from the group – awaiting govt updates. Health was queried as was part of remit, picked up in separate item on this agenda • Water group – SFRA completed, payments due. Water Cycle Study just started • Green Infrastructure group – GI refresh draft in train but need to understand more from the group. • Transport group – meeting 17 May, notes awaited. Richard mentioned that the DFT and National Highways had launched consultations which have implications on the A5. NWBC taking a response to committee. • Growth group – no meeting held <p>It was commented that the groups need to be providing a short report to CSWAPO on progress.</p> <p>Clare offered to chase up leads and produce a note – what have the groups achieved so far, future role, compare against the PAS note.</p>
5.	<p><u>HEDNA and MoU</u></p> <ul style="list-style-type: none"> • NBBC had circulated a further draft MoU (housing) for comment – aiming to consult on Reg 19 September 2023. Final comments back to Sarah by 30th June. • Some LAs have changes in political landscape so bringing new members up to speed, lots of questions being asked about plan evidence etc
6	<p><u>C&W monitoring</u></p> <p>CCC / NWBC note circulated for discussion and feedback. Comments back to Clare by 30th June</p> <p>There was a discussion around the draft table which is headed ‘completions to date’ as to whether that was just for that year or cumulative. Agreed it was cumulative. However it was felt that there needs to be wider consideration as to what data needs to be collected – one data set relates to adopted plans and current performance against the existing MoU, the second data set needs to relate to position statements and new local plans against the HEDNA base date. The note to consider these issues.</p> <p>Clare had discussed the need for monitoring support with Coventry’s Insight team – they do not have skills in house so if they were to undertake this they would have to provide additional resource. Feedback from WCC awaited, Chris E to chase Other options to be considered – Clare to discuss with Coventry colleagues</p>
7	<p><u>GTAA</u></p> <p>Rugby had raised an issue at the last meeting – needs further context, as RBC not present today, to be discussed at a further meeting. Neil was going to speak to WCC and feed back. Andrew suggested consideration of a position statement to help co-ordinate where everyone is at.</p>

	Clare mentioned that PAS had delivered some excellent training a couple of years or so ago – Clare to see if PAS have a recording of this, or if they might deliver more training.
8.	<p><u>Employment/Economy</u></p> <p>DB represents CSWAPO on the group undertaking the WMSESS although not at CSWAPO to update. Clare / Mike advised that the work was in train and data was being chased up and amendments made to an early draft.</p>
9.	<p><u>JMOG</u></p> <p>No update – Clare to set up meeting</p>
10	<p><u>NHS contributions</u></p> <ul style="list-style-type: none"> • NWBC still looking at issues on a case by case basis • Warwick have asked legal team • Nuneaton have taken legal advice – confirmation being sought as to whether this can be shared • Coventry are discussing with legal team
11	<p><u>CSWAPO budget</u></p> <p>It was decided that this should be retained pending a decision on how CSWAPO strategic monitoring needs to be undertaken</p>
12.	<p><u>WMCA</u></p> <p>WMCA – housing figures across the CA area being chased, [REDACTED] [REDACTED]</p>
13.	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – I&O paper for local plan due to be published July 23. HMO DPD (Reg 19) is almost ready to be submitted to PINS. No issues had been raised by CSWAPO members in terms of it being considered a document which addresses a local (rather than a strategic) matter. • Hinckley and Bosworth – Refreshing evidence base currently. Looking at production of area wide design codes. • North Warks – Open space and Waste SPD now adopted. Gypsy and Traveller Allocations and Employment SDP/DPD's later this year. • Nuneaton – new LDS to go to Cabinet 21st June. Reg 19 to be pushed back to September. Gypsy and Traveller DPD examination – Inspector's report received discussing modifications with Inspector. • Rugby – no further updates.

	<ul style="list-style-type: none"> • Solihull – Exchanges with Inspector ongoing, EiP paused until NPPF consultation is finalised • Stratford and Warwick SWLP - Issues and Options consultation (8 weeks) ran til 6th March, reps now being analysed. • Warwick – Net Zero Carbon DPD – Maid mods commenced on 5th June til 7th July. Inspector has advised report due end of October. • WCC – No further updates.
14.	<p><u>AOB</u></p> <p>Minor matter raised to ensure minutes are numbered correctly</p>
15	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>12 July 2023 Stratford on Avon</p> <p>9 August 2023 Solihull</p> <p>13 September 2023 Warwick</p> <p>11 October 2023 Coventry</p> <p>8 November 2023 North Warwickshire</p> <p>6 December 2023 Hinckley and Bosworth</p> <p>10 January 2024 Rugby</p> <p>14 February 2024 (and AGM) Nuneaton</p>



CSWAPO Minutes

Date: 12 July 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Joanne Bozdoganli (Chair)	Stratford on Avon DC
Sarah Matile	Nuneaton & Bedworth BC
Maria Bailey	Nuneaton & Bedworth BC
Maurice Barlow	Solihull MBC
Clare Eggington	Coventry City Council
Chris Styles	Coventry City Council
Dan Taylor	Coventry City Council
Mike Dittman	North Warwickshire BC
Andrew Cornfoot	Warwick DC
Richard Thresh	Hinckley & Bosworth BC
Neil Holly	Rugby BC

Apologies:

Dorothy Barratt	North Warwickshire BC
Chris Egan	Warwickshire CC

1.	<p><u>Minutes of last CSWAPO meeting and matters arising</u></p> <p>Agreed</p> <p>Two actions deferred – joint planning / workstream note, and request to PAS regarding previous Gypsy and Traveller training (CE had queried whether the recording or slides were still available, response awaited)</p>
2	<p><u>National Planning reforms</u></p> <p>Standing item, no further update at present</p>
3.	<p><u>Joint Strategic Planning/Workstreams</u></p> <p>Update deferred to next meeting – Clare to produce note</p>
4.	<p><u>MoU</u></p>

	<p>Further MoU circulated. Officer comments now finalised. NBBC (Maria / Sarah) advised that the Regulation 19 Plan was going to committee on 11th July then Cabinet on 26th July, aiming to begin consultation early September, but need to have a discussion with members first, including engagement with the Leaders of the other DtC Local Authorities. [REDACTED] Andrew asked for further information, and also requested that CSWAPO members have sight of the letter which will go out to Local Authority leaders. This was agreed, NBBC to action.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>CCC advised for context that its Local Plan Review Issues and Options paper had been through Cabinet on 11th July and consultation was planned to start on 18th July. Clare / Chris advised that the council would be consulting on three housing growth options, the standard method figure, the HEDNA figure and the HEDNA figure minus the 35% uplift for Coventry, and that for the latter it is not the council's intention to ask other CSWAPO authorities to help deliver the 35% in the event that this is the option which CCC proceeds with. It is also the intention of CCC to deliver as much of its identified growth as possible within its own boundaries looking at further capacity and increased densification and how this might be sustainably achieved as set out in the consultation document – further work is due to be undertaken on these matters.</p> <p>Given that other authorities are at earlier stages of plan-making (or have not yet begun any such review) it was agreed that the MoU would be updated at appropriate points to ensure that it was up to date and reflective of latest positions across the HMA and FEMA.</p>
5	<p><u>C&W monitoring</u></p> <p>Clare had circulated a draft note incorporating comments received to the previous iteration. Actions agreed:</p> <ul style="list-style-type: none"> • Mike to check with Dorothy regarding the source of Tables 2.1 and 2.2 [REDACTED] • Jo to send the most recent published position statement from the GBBCHMA to assist with completing the spec for further monitoring • Clare to update the draft note, to include detail on what will be required for future monitoring eg plan progress, capacity, supply etc. This needs to include employment including strategic distribution. <p>An update from Chris Egan will be provided at the next CSWAPO meeting in terms of a potential offer from WCC to support strategic monitoring.</p>
6.	<p><u>Employment/Economy</u></p> <p>Dorothy represents CSWAPO on the group undertaking the WMSESS. Mike provided a verbal update – following data returns progress is being made [REDACTED] the study is looking at the contribution that smaller units can make and is also investigating potential apportionment. [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

	<ul style="list-style-type: none"> • Mike to circulate the slides to those in CSWAPO who are engaged in the study (CCC, NWBC, SDC, WDC, RBC, NBBC, SMBC) • Dorothy to request that the steering group keeps all partners (as above) updated
7.	<p><u>JMOG</u></p> <p>JMOG met on 11th July. Minutes awaited. Key issues were that housing delivery was patchy, with raw data indicating slower delivery than expected in Warwick DC, but very high performance in Rugby relating to good rates of delivery on some large strategic sites.</p> <p>How 'completions' were being defined across the CSWAPO region had been discussed</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
8	<p><u>CSWAPO budget</u></p> <p>It was decided that this should be retained pending a decision on how CSWAPO strategic monitoring needs to be undertaken.</p>
9.	<p><u>WMCA</u></p> <p>[REDACTED]</p>
10.	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – I&O paper for local plan (including the AAP) was approved by Cabinet for consultation, aiming to start 18/7/23 for 8 weeks. HMO DPD (Reg 19) is almost ready to be submitted to PINS. • Hinckley and Bosworth – Refreshing evidence base currently. May need to revisit Regulation 18 due to implications of the Leicestershire B8 study. • North Warks – Gypsy and Traveller Allocations Issues and Options DPD had been reported to Board. Employment DPD due for internal consultation in the autumn. • Nuneaton – Regulation 19 plan – reporting to committee on 12th July, Cabinet on 26th July, aiming to consult in September and submit by 23 December. • Rugby – no further updates. • Solihull - EiP paused due to NPPF uncertainty, await further advice from the inspector. • Stratford and Warwick SWLP – processing reps to the Issues and Options consultation and preparing further evidence.

	<ul style="list-style-type: none"> Warwick – Net Zero Carbon DPD – Maid mods commenced on 5th June ended 17th July. Inspector has advised report due end of October. WCC – No further updates.
11.	<p><u>AOB</u></p> <p>Recent DLUHC workshop indicated slipped timescales for the NPPF / wider planning reform but still very uncertain.</p>
12	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>9 August 2023 Solihull</p> <p>13 September 2023 Warwick</p> <p>11 October 2023 Coventry</p> <p>8 November 2023 North Warwickshire</p> <p>6 December 2023 Hinckley and Bosworth</p> <p>10 January 2024 Rugby</p> <p>14 February 2024 (and AGM) Nuneaton</p> <p>12 March 2024 Stratford on Avon</p>



CSWAPO Minutes

Date: 9 August 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow (Chair)	Solihull MBC
Maria Bailey	Nuneaton & Bedworth BC
Matthew Neal	Stratford on Avon DC
Clare Eggington	Coventry City Council
Chris Styles	Coventry City Council
Dan Taylor	Coventry City Council
Mike Dittman	North Warwickshire BC
Andrew Cornfoot	Warwick DC
Dorothy Barratt	North Warwickshire BC
Richard Thresh	Hinckley & Bosworth BC
Chris Egan	Warwickshire CC
Hayley Smith	Rugby BC

Apologies:

1.	<p><u>Minutes of last CSWAPO meeting and matters arising</u></p> <p>Agreed</p>
2.	<p><u>Joint Strategic Planning/Workstreams</u></p> <p>CE had produced a note for discussion</p> <p>Strategic priorities theme – needs to be revisited and updated as joint C&W strategy now not to be produced, but still worth revisiting in light of updated developments and cumulative impacts especially around infrastructure. Consider in context of Leicestershire work as well [REDACTED]</p> <p>Critical Infrastructure – Mike raised following points: encouraged all to look at consultations which have been highlighted; needs to be stronger links with transport (eg charging points and call on energy resources); needs to be consideration on health contributions and whether there should be a consistent approach. Maria to ask if PAS can support with this. Clare to speak to CCC Public health for advice and possible feedback to CSWAPO to assist with understanding as to how health funding works etc</p>

	<p>Green Infrastructure strategy – Dorothy advised that a draft is due (from David Lowe) for circulation to CSWAPO 11th August 2023. Natural Capital Investment Strategy – WCC looking to set up with consultant [REDACTED] working group being established, meeting on 8th September. ‘Board’, 21st September.</p>
3.	<p><u>MoU progress</u></p> <p>Draft letter (17th July 2023) had been circulated to CSWAPO. Letter (same as the draft) has now been sent out to Leaders and NBBC awaiting feedback.</p>
4	<p><u>C&W monitoring</u></p> <p>Clare had circulated a draft note incorporating comments received to the previous iteration. Feedback to Clare by 23rd August then Chris Egan to raise with WCC as some resource might be possible [REDACTED]</p>
5.	<p><u>Employment/Economy</u></p> <p>Update from Iceni to be provided to CSWAPO, Mike to liaise and request 3pm for those LAs who are contributing financially to the study</p> <p>Dorothy raised an issue re strategic employment sites and the need for all authorities to be open to discussions about the distribution of this need across the sub-region</p>
6.	<p><u>JMOG</u></p> <p>JMOG met on 11th July. Minutes circulated</p> <p>Work to be undertaken to ensure that consistency is achieved on how completions are determined.</p> <p>Mike advised that one of their Neighbourhood Plans had sought to restrict housing types to 2/3 bed homes [REDACTED] [REDACTED] so will update shortly.</p>
7	<p><u>Biodiversity Net Gain</u></p> <p>Andrew had circulated an email asking where other LAs were in terms of dealing with the issue, Coventry, Rugby and Solihull had responded. North Warwickshire considering SPD (possibly a joint Warwickshire one), potentially using the adopted Coventry one as a starting point but adapting to suit local circumstances. Any further comments appreciated by Andrew.</p>
8	<p><u>CSWAPO budget</u></p> <p>It was decided that this should be retained pending a decision on how CSWAPO strategic monitoring needs to be undertaken, also potentially other advice (eg health).</p>

9.	<p><u>WMCA</u></p> <p>[REDACTED]</p>
10.	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – I&O paper for local plan (including the AAP) out to consultation until 12th September. HMO DPD (Reg 19) due to be submitted to PINS end of August. • Hinckley and Bosworth – Refreshing evidence base currently. May need to revisit Regulation 18 due to implications of the Leicestershire B8 study. • North Warks – Gypsy and Traveller Allocations Issues and Options DPD had been reported to Board. [REDACTED] • Nuneaton – Regulation 19 plan – reporting to committee on 12th July, Cabinet on 26th July, aiming to consult starting 4th September for six weeks • Rugby – currently consulting on mods to the CIL charging schedule prior to submission. • Solihull - EiP paused due to NPPF uncertainty, await further advice from the inspector. • Stratford and Warwick SWLP – processing reps to the Issues and Options consultation / call for sites and preparing further evidence. • Warwick – Net Zero Carbon DPD – Main mods commenced on 5th June ended 17th July. Inspector has advised report due end of October. • WCC – No further updates.
11.	<p><u>AOB</u></p> <p>Maria added a comment about the MoU to confirm that the draft letter (17th July) was the same as the one circulated to Leaders.</p>
12	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>13 September 2023 Warwick</p> <p>11 October 2023 Coventry</p> <p>8 November 2023 North Warwickshire</p> <p>6 December 2023 Hinckley and Bosworth</p> <p>10 January 2024 Rugby</p>

14 February 2024 (and AGM) Nuneaton
12 March 2024 Stratford on Avon
10 April 2024 Solihull



CSWAPO Minutes

Date: 13th September 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Andrew Cornfoot (Chair)	Warwick DC
Katie Johnson	Solihull MBC
Clare Eggington	Coventry City Council
Dan Taylor	Coventry City Council
Mike Dittman	North Warwickshire BC
Dorothy Barratt	North Warwickshire BC
Richard Thresh	Hinckley & Bosworth BC
Chris Egan	Warwickshire CC
Hayley Smith	Rugby BC
Neil Holly	Rugby BC
Jacqui Padbury	Nuneaton & Bedworth BC
Jo Bozdoganli	Stratford on Avon DC
Becky Davies	Warwick DC (Item on BNG only)
David Lowe	Warwickshire CC (item on BNG only)
Vanessa Evans	Warwickshire CC (Item on BNG only)

Apologies:

Maria Bailey & Sarah Matile - Nuneaton & Bedworth

Maurice Barlow - Solihull

Chris Styles - Coventry City Council

1.	<p><u>Biodiversity Net Gain</u></p> <p>David Lowe and Vanessa Evans attended at the start of the meeting to update on Biodiversity Net Gain (BNG) and how this should be implemented, monitored, reported and enforced. Particular issue with on-site BNG. Discussions ongoing between different districts as to how to manage this to co-ordinate and keep costs down and what companies could potentially help if felt to be appropriate. The 'offer' has been different depending on the companies promoting support.</p> <p>A discussion followed – each Local Authority has differing resources and approaches, some have ecologists some do not and there are various different service level agreements etc</p>
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	<p>Agreed that this matter needs to be discussed in detail by the Natural Environment CSWAPO workstream group which is chaired by Tony Ward (Warwick DC).</p> <p>Agreed that a paper will be prepared by David Lowe for CSWAPO to set out the situation and what is required.</p> <p>Once CSWAPO members have considered, this will form the basis of discussions for the next meeting of the Natural Environment workstream group.</p>
2	<p><u>Minutes of last CSWAPO meeting and matters arising</u></p> <p>Agreed</p> <p>Outstanding actions – picked up in relevant sections below</p>
3	<p><u>Joint strategic priorities – workstreams (items not covered by item 1)</u></p> <ul style="list-style-type: none"> • Rolled forward from last meeting - strategic priorities theme needs to be revisited and updated as joint C&W strategy now not to be produced, but still worth revisiting in light of updated developments and cumulative impacts especially around infrastructure. Consider in context of Leicestershire work as well [REDACTED] • Critical Infrastructure – rolled forward item needs to be consideration on health contributions and whether there should be a consistent approach. Maria has asked if PAS can support with this – awaiting feedback. Clare to speak to CCC Public health for advice and possible feedback to CSWAPO to assist with understanding as to how health funding works etc. Mike to ask Northern Estates forum (acute care, George Elliot, GP groups etc) if any guidance / update.
4.	<p><u>MoU progress</u></p> <p>Letter sent out to Leaders and NBBC awaiting feedback. Deadline by 15th September 2023.</p>
5	<p><u>C&W monitoring</u></p> <p>Clare had circulated a draft note incorporating comments received to the previous iteration. Feedback to Clare by 22nd September then Chris Egan to raise with WCC as some resource might be possible [REDACTED]</p>
6	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – I&O paper for local plan (including the AAP) out to consultation until 29th September (extended deadline). HMO DPD (Reg 19) was submitted to PINS end of August and an Inspector has been appointed.

	<ul style="list-style-type: none"> • Hinckley and Bosworth – Refreshing evidence base currently. May need to revisit Regulation 18 due to implications of the Leicestershire B8 study. • North Warks – Authority to consult on Gypsy and Traveller Allocations Issues and Options DPD and SA scoping, draft scoping on SCI. Employment DPD temporarily on hold pending the regional strategic employment site study. • Nuneaton – Regulation 19 plan consultation –started 4th September for six weeks (16th October). Also consulting on main modifications to the gypsy and traveller site allocations DPD • Rugby – no further update • Solihull - EiP continues to be paused due to NPPF uncertainty, await further advice from the inspector. • Stratford and Warwick SWLP – processing reps to the Issues and Options consultation / call for sites and preparing further evidence. • Warwick – Net Zero Carbon DPD – Main mods commenced on 5th June ended 17th July. Inspector has advised report due end of October. • WCC – Chris had circulated a minerals safeguarding note for feedback
7	<p><u>West Midlands strategic employment sites study</u></p> <p>ICENI attended to give a presentation on the emerging West Midlands strategic employment sites study for those involved. Various questions asked and discussion around the consistency in the quantum of strategic employment land required in the WMSESS and the C&W HEDNA and the challenges this might pose the local authorities. Matt Kinghan of ICENI to produce a note on this matter.</p>
8	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>11 October 2023 Coventry</p> <p>8 November 2023 North Warwickshire</p> <p>6 December 2023 Hinckley and Bosworth</p> <p>10 January 2024 Rugby</p> <p>14 February 2024 (and AGM) Nuneaton & Bedworth</p> <p>12 March 2024 Stratford on Avon</p> <p>10 April 2024 Solihull</p> <p>8 May 2024 Warwick</p>

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CSWAPO Minutes

Date: 11th October 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Chris Styles (Chair)	Coventry CC
Clare Eggington	Coventry CC
Andrew Cornfoot	Warwick DC
Maurice Barlow	Solihull MBC
Mike Dittman	North Warwickshire BC
Jo Bozdoganli	Stratford on Avon DC
Richard Thresh	Hinckley & Bosworth BC
Chris Egan	Warwickshire CC
Hayley Smith	Rugby BC
Neil Holly	Rugby BC
Jacqui Padbury	Nuneaton & Bedworth BC
Sarah Matile	Nuneaton & Bedworth BC

Apologies:

Dorothy Barratt NWBC

Maria Bailey NBBC

1	<u>Minutes of last CSWAPO meeting and matters arising</u> Agreed Outstanding actions picked up in sections below.
2	<u>Joint strategic priorities – workstreams</u> Natural Environment Workstream. BNG was discussed at the previous meeting (13 th September) . David Lowe was to produce a note to form the basis of discussion at the next meeting of the group (chaired by Tony Ward). Jo to contact David Critical Infrastructure – rolled forward item needs to be consideration on health contributions and whether there should be a consistent approach. Maria has asked if PAS can support with this – awaiting feedback. Clare to speak to CCC Public health for advice and possible feedback to CSWAPO to assist with understanding as to how health funding works etc. Mike to ask Northern Estates forum (acute care, George Elliot, GP groups etc) if any guidance / update HEDNA – Neil advised that household projections now being delayed til 2025 Transport – no further update at present Water – water cycle study ongoing

	<p>Strategic priorities theme (rolled forward item from 13th September) needs to be revisited and updated as joint C&W strategy now not to be produced, but still worth revisiting in light of updated developments and cumulative impacts especially around infrastructure. Consider in context of Leicestershire work as well [REDACTED]</p> <p>[REDACTED]</p>
3	<p><u>CSWAPO minutes and notes – discussion</u></p> <p>A number of members needed to be able to share the minutes for the purpose of examinations etc to evidence engagement under the Duty to Co-operate. All agreed this would be helpful but need to check the original ToR. Some items would not be able to be shared eg sensitive items or draft reports etc. Most members were not part of CSWAPO at its outset so it was agreed North Warwickshire BC should locate the information originally agreed. Mike to action.</p>
4.	<p><u>MoU progress</u></p> <p>NBBC provided an update following email to Leaders and Portfolio Holders in case extension of time needed, please advise NBBC asap if so. NBBC aims to submit the Reg 19 plan by end of December. Action: all</p>
5	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>Monitoring note drafted and circulated. Chris Egan to raise with WCC to discuss potential resource to support position statements.</p> <p>JMOG lead and role to be discussed at the AGM</p>
6	<p><u>Employment/ Economy including Strategic Employment Site update</u></p> <p>Comments had been circulated from CSWAPO members to the study. As the steering group representative from CSWAPO, Mike to forward comments on to Icenl and cc Andy Donnelly and Ian Culley to ensure they are picked up and addressed.</p>
7	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> Coventry – I&O paper for local plan (including the AAP) was out to consultation until 29th September (extended deadline). HMO DPD (Reg 19) was submitted to PINS end of August and an Inspector has been appointed. Hinckley and Bosworth – Refreshing evidence base currently. May need to revisit Regulation 18 due to implications of the Leicestershire B8 study. Doing joint transport evidence base. North Warks – Authority to consult on Gypsy and Traveller Allocations Issues and Options DPD and SA scoping, call for sites, draft scoping on SCI all to go before Christmas. Employment DPD temporarily on hold pending the regional strategic employment site study. Now likely to be progressed Jan / Feb 2024.

	<ul style="list-style-type: none"> • Nuneaton – Regulation 19 plan consultation –started 4th September for six weeks (16th October). Aim to submit by end of 2023. Also consulting on main modifications to the gypsy and traveller site allocations DPD • Rugby – aim to get draft I&O to council 25 Oct 2023. • Solihull - EiP continues to be paused due to NPPF uncertainty, await further advice from the inspector. • Stratford and Warwick SWLP – discussing next stages and LDS with members. • Warwick – Net Zero Carbon DPD – Main mods commenced on 5th June ended 17th July. Inspector has advised report due end of October. • WCC – Chris had circulated a minerals safeguarding note for feedback
8	<p><u>AOB</u></p> <p>Solihull and Hinckley and Bosworth advised they would not be attending for the next item as they consider they do not have any connections with Rugby with regard to this topic.</p>
9	<p><u>Rugby Gypsy and Traveller needs discussion</u></p> <p>Jeff May and Jonathan Toy (both WCC) and Martin Rone-Clarke (Warwickshire Police) attended to discuss Rugby BCC's Gypsy and Traveller needs. A note had been circulated to provide a position statement across CSWAPO.</p> <p>There was a discussion on how to provide, private vs public provision and other councils' experiences. Most are private sites. WCC explained they have taken over overseeing 3 sites in the county (Stratford, Nuneaton and Alvecote) but they don't provide new sites. Have always tried to provide support in terms of assessing and identifying sites and this is their role moving forwards.</p> <p>In terms of the practicalities of delivery a summary of the key point discussed:</p> <ul style="list-style-type: none"> • National Policy Advisory Panel on Gypsy & Traveller Housing provide helpful guidance https://issuu.com/rooftop1/docs/places_we_re_proud_of • Options for allocation eg percentage of large strategic sites have been considered by some LAs • Smaller, self contained family sites work best • Avoid large expansions to large sites • Some small expansions to sites have worked in some areas • National 2015 guidance says 15 pitches and under but ideal size is 6-10 for communities of families. • CPO could be considered if needed • Suggestion of S106's as a option to help deliver sites etc eg to raise the funds to buy land and deliver

	<ul style="list-style-type: none"> • Transit vs negotiated stopping places - WCC has preference for negotiated stopping (which forms part of a county wide protocol developed in 2017) – new legislation supports this and WCC has good success this year. ESPs have proven difficult however. • Warwick and Stratford working together on shared evidence to feed into the local plan. • WCC and partners seeking advice from DLUHC to developing a county wide solution.
10	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>8 November 2023 North Warwickshire</p> <p>6 December 2023 Hinckley and Bosworth</p> <p>10 January 2024 Rugby</p> <p>14 February 2024 (and AGM) Nuneaton & Bedworth</p> <p>12 March 2024 Stratford on Avon</p> <p>10 April 2024 Solihull</p> <p>8 May 2024 Warwick</p> <p>12 June 2024 Coventry</p>

CSWAPO Minutes

Date: 8th November 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Mike Dittman (Chair)	North Warwickshire BC
Chris Styles	Coventry CC
Clare Eggington	Coventry CC
Andrew Cornfoot	Warwick DC
Maurice Barlow	Solihull MBC
Richard Thresh	Hinckley & Bosworth BC
Chris Egan	Warwickshire CC
Neil Holly	Rugby BC
Sarah Matile	Nuneaton & Bedworth BC

Apologies:

Dorothy Barratt NWBC

Maria Bailey NBBC

Jacqui Padbury NBBC

Jo Bozdoganli Stratford on Avon DC

1	<u>Public Practice</u> [REDACTED] attended from Public Practice for the first item to talk through their role as a social enterprise and how they can grow and develop roles and skills to support the public sector.
2	<u>Minutes of last CSWAPO meeting and matters arising</u> Agreed
3	<u>CSWAPO minutes and notes (follow up from previous meeting)</u> Mike had tried to find the original ToR but was unable to – Andrew and Maurice to see if these can be located. May need an update.
4	<u>Joint strategic priorities – workstream updates</u> Natural Environment Workstream. David Lowe had produced a note on BNG, to be discussed at the next meeting – Tony Ward to arrange, Mike to chase up. Critical Infrastructure – rolled forward item needs to be consideration on health contributions and whether there should be a consistent approach. Maria has asked if

	<p>PAS can support with this – awaiting feedback. Clare to speak to CCC Public health for advice and possible feedback to CSWAPO to assist with understanding as to how health funding works etc Northern Estates forum update awaited (acute care, George Elliot, GP groups etc) – Dorothy / Mike</p> <p>Transport – no further update at present but work is underway in relation to cross boundary issues as required. It was felt that to hold a specific workstream meeting would just duplicate other meetings which were ongoing.</p> <p>Water – water cycle study – months extension agreed, completion due end of November.</p>
5	<p><u>MoU / SoCG progress</u></p> <p>NBBC aims to submit the Reg 19 plan by end of December and requested feedback to the MoU which is still under consideration by many of the LAs. Action: all</p>
6	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>Monitoring note drafted and circulated. Business unit at WCC looking at whether can resource this and at what cost, will respond asap, Chris Egan to update</p> <p>CE to arrange a JMOG for end of 2023, JMOG lead and role to be discussed at the AGM.</p>
7	<p><u>Employment/ Economy including Strategic Employment Site update</u></p> <p>Mike had forwarded comments on to Iceni and cc'd Andy Donnelly and Ian Culley to ensure they are picked up and addressed. Initial draft anticipated mid to late Dec.</p>
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – I&O consultation ended 29th September, reps being analysed. HMO DPD hearing date is 23rd January 2024. • Hinckley and Bosworth – Refreshing evidence base currently. May need to revisit Regulation 18 due to implications of the Leicestershire B8 study. Doing joint transport evidence base. • North Warks – Delayed publication of Gypsy and Traveller Allocations Issues and Options DPD, and SA scoping, call for sites, draft scoping on SCI til new year to consider implications of planning reforms. Employment DPD temporarily on hold pending the regional strategic employment site study. Now likely to be progressed Jan / Feb 2024. • Nuneaton – Aim to submit the Local Plan by end of 2023. • Rugby – I&O consultation – 14 weeks, deadline 2nd February 2024.

	<ul style="list-style-type: none"> • Solihull - EiP continues to be paused due to NPPF uncertainty, await further advice from the inspector. • Stratford and Warwick SWLP – joint Cabinet report 23rd November re timetable. Hoping to progress under the current system. Looking to do a Green Belt study, will tender soon. • Warwick – Net Zero Carbon DPD - Inspector had advised report due end of October but no update as yet. • WCC – no updates
9	<p><u>AOB</u></p> <p>Government reforms to be an item on the next agenda</p>
10	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>13 December 2023 Hinckley and Bosworth</p> <p>10 January 2024 Rugby</p> <p>14 February 2024 (and AGM) Nuneaton & Bedworth</p> <p>12 March 2024 Stratford on Avon</p> <p>10 April 2024 Solihull</p> <p>8 May 2024 Warwick</p> <p>12 June 2024 Coventry</p> <p>10 July 2024 North Warwickshire</p>

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 13th December 2023

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Hayley Smith (Chair)	Rugby BC
Mike Dittman	North Warwickshire BC
Chris Styles	Coventry CC
Clare Eggington	Coventry CC
Andrew Cornfoot	Warwick DC
Maurice Barlow	Solihull MBC
Wendy Hague	Hinckley & Bosworth BC
Chris Egan	Warwickshire CC
Maria Bailey	Nuneaton & Bedworth BC

Apologies:

Dorothy Barratt NWBC

Sarah Matile NBBC

Richard Thresh HBBC

Neil Holly RBC

Jacqui Padbury NBBC

Jo Bozdoganli Stratford on Avon DC

1	<u>Active Travel England</u> [REDACTED] attended for this item to give a presentation and lead a discussion on the work of Active Travel England and how this relates to planning policy.
2	<u>Minutes of last CSWAPO meeting and matters arising</u> Agreed
3	<u>CSWAPO minutes and notes (follow up from previous meeting)</u> Format of notes and intended (officer) audience discussed.
4	<u>Joint strategic priorities – workstream updates</u> Natural Environment Workstream being progressed on BNG Critical Infrastructure – work progressing Transport – ongoing work between LAs to ensure delivery of projects Water – water cycle study – due by end of December

	HEDNA – discussion on latest MYE (November 2023)
5	<p><u>MoU / SoCG progress</u></p> <p>Progress ongoing with NBBC's Reg 19 submission of plan, various DtC discussions underway.</p>
6	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <ul style="list-style-type: none"> • WCC feedback awaited on strategic monitoring support Chris E to chase • JMOG meeting arranged Jan 2024
7	<p><u>Employment/ Economy including Strategic Employment Site update</u></p> <ul style="list-style-type: none"> • WMSESS draft expected before Christmas, but additional information being included may delay draft. • Mike / Dorothy to chase up the note promised by Icenl at the September meeting of CSWAPO
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – I&O consultation ended 29th September, reps being analysed. HMO DPD hearing date is 23rd January 2024. • Hinckley and Bosworth – Revised LDS due early 2024. Refreshing evidence base inc implications of the Leicestershire B8 study. Doing joint transport evidence base. • North Warks – Delayed publication of Gypsy and Traveller Allocations Issues and Options DPD, and SA scoping, call for sites, draft scoping on SCI til new year following the current Corporate Plan consultation. Employment DPD temporarily on hold pending the regional strategic employment site study. Now likely to be progressed Jan / Feb 2024. Review of Local Plan agreed but waiting to see what new NPPF says to consider implications of planning reforms. • Nuneaton – Aim to submit the Local Plan shortly, early 2024. • Rugby – I&O consultation – 14 weeks, deadline 2nd February 2024. • Solihull - EiP continues to be paused due to NPPF uncertainty, await further advice from the inspector. • Stratford and Warwick SWLP – New timetable agreed by Joint Cabinet on 23rd November – this will be reflected in updated LDS reports in early 2024 • Warwick – Net Zero Carbon DPD - Inspector had advised report due end of October but delayed. • WCC – no updates

9	<p><u>AOB</u></p> <p>Government planning reforms to be an item on the next agenda</p>
10	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>10 January 2024 Nuneaton and Bedworth</p> <p>14 February 2024 (and AGM) Hinckley and Bosworth</p> <p>12 March 2024 Stratford on Avon</p> <p>10 April 2024 Solihull</p> <p>8 May 2024 Warwick</p> <p>12 June 2024 Coventry</p> <p>10 July 2024 North Warwickshire</p> <p>14 August 2024 Rugby</p>

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 10th January 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Neil Holly (Chair)	Rugby BC
Hayley Smith	Rugby BC
Mike Dittman	North Warwickshire BC
Dorothy Barratt	North Warwickshire BC
Daniel Taylor	Coventry City Council
Maurice Barlow	Solihull MBC
Chris Egan	Warwickshire CC
Jo Bozdoganli	Stratford-on-Avon DC
Maria Baily	Nuneaton and Bedworth BC

Apologies:

Clare Eggington CCC
Chris Styles CCC
Andrew Cornfoot WDC
Sarah Matile NBBC
Jacqui Padbury NBBC
Richard Thresh HBBC
Wendy Hague HBBC

1	<u>Minutes of last CSWAPO meeting and matters arising</u> Agreed
2	<u>CSWAPO minutes and notes (follow up from previous meeting)</u> Format of notes and intended (officer) audience discussed.
3	<u>Changes to the NPPF and planning reform</u> The main implications for CSWAPO and on individual authority's Local Plan positions were discussed.
4	<u>Joint strategic priorities – workstream updates</u> Natural Environment Workstream – Biodiversity Net Gain – Discussion took place on getting a system in place for BNG monitoring and whether this could be a CSWAPO wide system. NBBC currently have up and running software to monitor BNG, under a 12 month contract, and are exploring if there are any economies of scale for it to be rolled out across the county. Information on the software to be circulated to CSWAPO members and whether the consultants could do a demonstration of the software. Critical Infrastructure – work progressing.

	<p>Transport – ongoing work between LAs to ensure delivery of projects.</p> <p>Water – water cycle study – Meeting to discuss draft date to be confirmed. Meeting arranged for w/c Monday 15th January and comments to be submitted by Friday 19th January.</p> <p>HEDNA – discussion on latest MYE (November 2023). CCC has been in touch with Iceni following the mid-year estimates from the ONS coming out in November 2023 to see whether these figures have any implications for the HEDNA and whether an addendum should be produced. SoADC re-looking at HEDNA following request from members in light of NPPF changes.</p>
5	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • Progress ongoing with NBBC's Reg 19 submission of plan, various DtC discussions underway. • NBBC to send around a signed MoU in due course.
6	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>Discussion from previous meeting:</p> <ul style="list-style-type: none"> • WCC feedback awaited on strategic monitoring support Chris E to chase • JMOG meeting arranged Jan 2024
7	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <ul style="list-style-type: none"> • Iceni presentation at the September meeting of CSWAP0 – report now issued. • Consultants request feedback by 19th January 2024. • Discussion around the areas of search where it was considered that the report needs to clarify which sites will be for manufacture and which for logistics. • WCC has been engaged. • [REDACTED] • [REDACTED] • Would be useful if CSWAP0 members could share their comments. • Word version emailed out to comment on.
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – updated LDS going to cabinet in February, but still aiming for submission under the current planning system. HMO DPD hearing date is 23rd January 2024. • Hinckley and Bosworth – No updates - last meeting had confirmed: Revised LDS due early 2024. Refreshing evidence base inc. implications of the Leicestershire B8 study. Doing joint transport evidence base. • North Warks – No updates - last meeting had confirmed: Delayed publication of Gypsy and Traveller Allocations Issues and Options DPD, and SA scoping, call for sites, draft scoping on SCI til new year following the current Corporate Plan consultation. Employment DPD temporarily on hold pending the regional

	<p>strategic employment site study. Now likely to be progressed Jan / Feb 2024. Review of Local Plan agreed but waiting to see what new NPPF says to consider implications of planning reforms.</p> <ul style="list-style-type: none"> • Nuneaton – Aim to submit the Local Plan by the end of the month. Gypsy and Travellers DPD going to cabinet tonight (10/01/24). • Rugby – No update - last meeting had confirmed: I&O consultation – 14 weeks, deadline 2nd February 2024. • Solihull - EiP continues to be paused as changes to the NPPF does not provide certainty and therefore looking at options. • Stratford and Warwick SWLP – Updated timetable of SWLP was realised and made public before Christmas confirming it will no longer hit the June 2025 date to be adopted under the current planning system. Currently commissioning a Green Belt review, which is out to tender. It is intended that the methodology would be discussed and agreed with CSWAPO. • Warwick – No updates - last meeting had confirmed: Net Zero Carbon DPD - Inspector had advised report due end of October but delayed. • WCC – no updates
9	<p><u>AOB</u></p> <p>Discussion on location for the AGM.</p>
10	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>14 February 2024 (and AGM) Hinckley and Bosworth</p> <p>12 March 2024 Stratford on Avon</p> <p>10 April 2024 Solihull</p> <p>8 May 2024 Warwick</p> <p>12 June 2024 Coventry</p> <p>10 July 2024 North Warwickshire</p> <p>14 August 2024 Rugby</p> <p>11 September 2024 Nuneaton and Bedworth</p>

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 14th February 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Richard Thresh (Chair)	Hinckley and Bosworth BC
Hayley Smith	Rugby BC
Mike Dittman	North Warwickshire BC
Maurice Barlow	Solihull MBC
Jo Bozdoganli	Stratford-on-Avon DC
Amit Bratch	Warwick DC
Jacqui Padbury	Nuneaton & Bedworth BC
Clare Eggington	Coventry City Council

Apologies:

Chris Styles CCC
Dan Taylor CCC
Andrew Cornfoot WDC
Sarah Matile NBBC
Maria Bailey NBBC
Neil Holly RBC
Dorothy Barratt NWBC
Chris Egan WCC

1	<u>Minutes of last CSWAPO meeting and matters arising</u> Agreed
2	<u>Changes to the NPPF and planning reform</u> The main implications for CSWAPO and on individual authority's Local Plan positions were discussed.
3	<u>Joint strategic priorities – workstream updates</u> Natural Environment Workstream – Biodiversity Net Gain – email from David Lowe re software had been circulated if interested let David Lowe know as may be economies of scale. Critical Infrastructure – work progressing. MD to put note together on sensitivity testing relating to the grid and capacity. Transport – ongoing work between LAs to ensure delivery of projects. S Leics joint transport modelling exploring various spatial strategies. Water – water cycle study – responses have gone back to the consultants. EA comments also sought.

	<p>HEDNA – some work ongoing with individual LAs in terms of assessing impacts of new data</p>
4	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • NBBC plan submitted with relevant SoCGs (from majority of Authorities), MoU work ongoing
5	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>Discussion from previous meeting:</p> <ul style="list-style-type: none"> • Discussion being held on 23rd February with WCC on strategic monitoring • WCC to chair JMOG (Chris), agreed at AGM 14th February following their offer
6	<p><u>JMOG</u></p> <ul style="list-style-type: none"> • Mike to circulate notes of the meeting held in January
7	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <ul style="list-style-type: none"> • Draft report issued – technical evidence, feedback provided to the consultants, response awaited • Discussion on how to deal with the issue once evidence complete
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – updated LDS approved by Cabinet 13th February, aiming for submission under the current planning system. HMO DPD hearing held 23rd January 2024, main mods consultation to follow timetable tbc • Hinckley and Bosworth – decision made to do a further Reg 18. • North Warks – Economic development strategy and action plan, employment DPD, SA scoping, SCI and call for sites all out for consultation / due for consultation shortly. • Nuneaton – Gypsy and traveller DPD adopted. Local plan was submitted to PINS on 12th February. • Rugby – Issues and options consultation closed, next stages tbc • Solihull - EiP - consideration underway as to how to proceed in the light of the NPPF changes. • Stratford and Warwick SWLP – The timetable proposes a Preferred Options consultation in Nov 24-Jan 25, a Regulation 19 consultation in Oct-Dec 25 and then Submission to the Secretary of State in July 2026. However due to absence of full details of the new style plans along with the uncertainty on timing of the publication of the guidance for new local plans the authorities have agreed to continue to produce SWLP under the old system. However, if the authorities have to move to producing the plan under the new system it is considered that

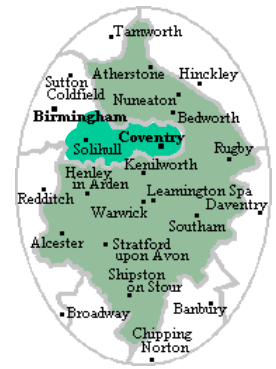
	<p>the evidence base and the consultation undertaken so far will be able to support the new style plan production</p> <ul style="list-style-type: none"> • Warwick – Further to the Written Ministerial Statement on net zero – inspector instructed WDC to undertake a further Reg 19 consultation, this is complete further action awaited. • WCC – no updates
9	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>12 March 2024 Warwick</p> <p>10 April 2024 Solihull</p> <p>8 May 2024 Stratford on Avon</p> <p>12 June 2024 Coventry</p> <p>10 July 2024 North Warwickshire</p> <p>14 August 2024 Rugby</p> <p>11 September 2024 Nuneaton and Bedworth</p> <p>9 October 2024 Hinckley and Bosworth</p>

Coventry, Solihull & Warwickshire Association of Planning Officers

Minutes - AGM

Date: Wednesday 14th February 2024, 2.00pm

Venue: Teams



Minutes

Attendees

Richard Thresh (Chair)	Hinckley and Bosworth BC
Hayley Smith	Rugby BC
Mike Dittman	North Warwickshire BC
Maurice Barlow	Solihull MBC
Jo Bozdoganli	Stratford-on-Avon DC
Amit Bratch	Warwick DC
Jacqui Padbury	Nuneaton & Bedworth BC
Clare Eggington	Coventry City Council

1.	Apologies Chris Styles CCC Dan Taylor CCC Andrew Cornfoot WDC Sarah Matile NBBC Maria Bailey NBBC Neil Holly RBC Dorothy Barratt NWBC Chris Egan WCC	
2.	Appointment of Officers agreed for the following year <ul style="list-style-type: none"> Secretary: Coventry City Council Treasurer: Warwickshire County Council Chair: revolving between member authorities 	
3.	Treasurers Report Statement of Account circulated and agreed. Budget to be reviewed by CSWAPO in line with recommendations in report and current discussion on strategic monitoring. Potential to also consider budget for advice and guidance on reforms and Duty to Co-operate matters.	
4.	Future dates and venues AGM to be held February 2025	
5.	Any other business	

	Chair of Joint Monitoring Officers Group agreed to be Warwickshire County Council c/o Chris Egan.	
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Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 13th March 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Andrew Cornfoot (Chair)	Warwick DC
Richard Thresh	Hinckley and Bosworth BC
Hayley Smith	Rugby BC
Neil Holly	Rugby BC
Mike Dittman	North Warwickshire BC
Katie Johnson	Solihull MBC
Chris Egan	Warwickshire County Council
Jacqui Padbury	Nuneaton & Bedworth BC
Clare Eggington	Coventry City Council
Rob Back	Coventry City Council

Apologies:

Chris Styles CCC
Dan Taylor CCC
Sarah Matile NBBC
Maria Bailey NBBC
Dorothy Barratt NWBC
Jo Bozdoganli SDC
Maurice Barlow SMBC

1	<u>PAS discussion</u> Coventry City Council had secured some support from PAS on the Duty to Co-operate and a representative attended to lead a discussion.
2	<u>Minutes of last CSWAPO meeting, AGM and any matters arising</u> Agreed
3	<u>Changes to the NPPF and planning reform</u> Various consultations from Government in process of being responded to and there was a discussion on these.
4	<u>Joint strategic priorities – workstream updates</u> Natural Environment Workstream – Tony Ward setting up meeting Critical Infrastructure – work progressing. MD will circulate note on sensitivity testing relating to the grid and capacity. Transport – ongoing work between LAs to ensure delivery of projects.

	<p>Water – water cycle study – responses have gone back to the consultants. EA comments received. Report due mid April</p> <p>HEDNA – some work ongoing with individual LAs in terms of assessing impacts of new data</p>
5	<p><u>MoU / SoCG progress</u></p> <p>NBBC plan submitted with relevant SoCGs (from majority of Authorities), MoU work ongoing. CCC considering a range of matters in relation to its own plan review and will contact LAs and other DtC bodies in due course.</p>
6	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>Discussion was held on 23rd February with WCC on strategic monitoring – WCC will allocate time to this, an officer will start work in spring.</p>
7	<p><u>JMOG</u></p> <ul style="list-style-type: none"> • Mike to circulate notes of the meeting held in January • Approaches to employment monitoring and housing monitoring to be discussed at future meeting of JMOG • Clare to send list of JMOG members to Chris E.
8	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <p>Lengthy discussion on the WMSESS study, Rugby have indicated they are withdrawing from this on the basis of a range of concerns. Neil is having further discussions with the project leads and will feed back</p>
9	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – updated LDS approved by Cabinet 13th February, aiming for submission under the current planning system. HMO DPD hearing held 23rd January 2024, main mods consultation to follow, timetable tbc. • Hinckley and Bosworth – Reg.18 – June/July 2024, Reg.19 – Jan/Feb 2025 Submission – May 2025. Plan period now updated to 2020-2041 • North Warks – Economic development strategy and action plan, employment DPD, SA scoping, SCI and call for sites all out for consultation until 9th May 2024 • Nuneaton – Gypsy and traveller DPD adopted. Local plan was submitted to PINS on 12th February. • Rugby – Issues and options consultation closed, next stages tbc • Solihull - EiP - responded to Inspectors to say the updated NPPF does apply in the light of no requirement to release Green belt, Inspectors disagree, waiting on further views from the Inspectorate.

	<ul style="list-style-type: none"> • Stratford and Warwick SWLP – The timetable proposes a Preferred Options consultation in Nov 24-Jan 25, a Regulation 19 consultation in Oct-Dec 25 and then Submission to the Secretary of State in July 2026. However due to absence of full details of the new style plans along with the uncertainty on timing of the publication of the guidance for new local plans the authorities have agreed to continue to produce SWLP under the old system. However, if the authorities have to move to producing the plan under the new system it is considered that the evidence base and the consultation undertaken so far will be able to support the new style plan production • Warwick – Further to the Written Ministerial Statement on net zero – inspector instructed WDC to undertake a further Reg 19 consultation, this is complete further action awaited. LDS updated 6th March. University of Warwick Masterplan SPD consultation approved – being done jointly with Coventry City Council. • WCC – no updates
10	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>10 April 2024 Solihull</p> <p>8 May 2024 Stratford on Avon</p> <p>12 June 2024 Coventry</p> <p>10 July 2024 North Warwickshire</p> <p>14 August 2024 Rugby</p> <p>11 September 2024 Nuneaton and Bedworth</p> <p>9 October 2024 Hinckley and Bosworth</p> <p>13 November 2024 Warwick</p>

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 10th April 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow (Chair)	Solihull MBC
Andrew Cornfoot	Warwick DC
Richard Thresh	Hinckley and Bosworth BC
Hayley Smith	Rugby BC
Neil Holly	Rugby BC
Mike Dittman	North Warwickshire BC
Chris Egan	Warwickshire County Council
Clare Eggington	Coventry City Council
Chris Styles	Coventry City Council
Rob Back	Coventry City Council
Jo Bozdoganli	Stratford on Avon DC

Apologies:

Sarah Matile NBBC

Maria Bailey NBBC

Jacqui Padbury NBBC

Dorothy Barratt NWBC

1	<u>Minutes of last CSWAPO meeting, AGM and any matters arising</u> Agreed
2	<u>Changes to the NPPF and planning reform</u> NWBC – response to consultation on the NPPF went to committee and link will be circulated CCC had responded with strong objections to many of the proposals in government’s brownfield consultation and had also joined with a collaboration of cities in submitting a joint response.
3	<u>Joint strategic priorities – workstream updates</u> Natural Environment Workstream – Tony Ward setting up meeting – dates tbc. Need confirmation as to where the refresh of the GI strategy is at (to be discussed at the forthcoming meeting). SDC and WDC working with Arup to look at nature based solutions (to be published shortly). Jo will circulate the link when available, also a link to a renewable energy report. Rugby also mapping renewable sites. Critical Infrastructure – work progressing. Mike will circulate note on sensitivity testing relating to the grid and capacity.

	<p>Transport – ongoing work between LAs to ensure delivery of projects. SDC and WDC working with WCC on a strategic transport assessment for the SWLP. To consider a need to have an update meeting on this topic to ensure all joined up as plans progress.</p> <p>Water – water cycle study – responses to draft report due 19th April and note time limited download for GIS shape files associated with the study. Need to ensure outstanding funding matters resolved with NBBC</p> <p>HEDNA – some work ongoing with individual LAs in terms of assessing impacts of new data. Coventry MYE update work is being finalised by Iceni and will be discussed further shortly</p>
4	<p><u>MoU / SoCG progress</u></p> <p>NBBC plan submitted with relevant SoCGs (from majority of Authorities), MoU work ongoing. CCC considering a range of matters in relation to its own plan review and will contact LAs and other DtC bodies in due course.</p>
5	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>Meeting held with WCC to discuss the role and how to report – what is collected, how and by whom. WCC officers will attend next JMOG to discuss further.</p>
6	<p><u>JMOG</u></p> <ul style="list-style-type: none"> • Chris E setting up meeting • Minutes of last meeting circulated to CSWAPO – to remind JMOG members to complete and return information on how they collect data as requested in the notes
7	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <p>Lengthy discussion on the WMSESS study – some amendments underway because of some concerns raised.</p>
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – Aiming to undertake Reg 19 Autum 2024. HMO DPD hearing held 23rd January 2024, main mods consultation to follow, timetable tbc. • Hinckley and Bosworth – Reg.18 – June/July 2024, Reg.19 – Jan/Feb 2025 Submission – May 2025. Plan period now updated to 2020-2041 • North Warks – Economic development strategy and action plan, employment DPD, SA scoping, SCI and call for sites all out for consultation until 9th May 2024. • Nuneaton – Gypsy and traveller DPD adopted. Local plan was submitted to PINS on 12th February, Inspector appointed and now awaiting MIQs. • Rugby – Issues and options consultation closed, next stages tbc

	<ul style="list-style-type: none"> • Solihull - EiP - responded to Inspectors to say the updated NPPF does apply in the light of no requirement to release Green belt, Inspectors disagree, waiting on further views from the Inspectorate. • Stratford and Warwick SWLP – Green Belt Review – will discuss methodology with CSWAP0. The timetable proposes a Preferred Options consultation in Nov 24-Jan 25, a Regulation 19 consultation in Oct-Dec 25 and then Submission to the Secretary of State in July 2026. However due to absence of full details of the new style plans along with the uncertainty on timing of the publication of the guidance for new local plans the authorities have agreed to continue to produce SWLP under the old system. However, if the authorities have to move to producing the plan under the new system it is considered that the evidence base and the consultation undertaken so far will be able to support the new style plan production • Warwick – Net Zero DPD found sound (with mods) anticipated to be adopted by Council mid May • WCC – no updates
9	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>8 May 2024 Stratford on Avon</p> <p>12 June 2024 Coventry</p> <p>10 July 2024 North Warwickshire</p> <p>14 August 2024 Rugby</p> <p>11 September 2024 Nuneaton and Bedworth</p> <p>9 October 2024 Hinckley and Bosworth</p> <p>13 November 2024 Warwick</p> <p>11 December 2024 Solihull</p>
10	<p><u>AOB:</u></p> <p>Clare sends apologies for next meeting, volunteer for note taking requested</p> <p>Andrew sends apologies for next meeting</p> <p>HBBC advised they now have a consultant in place to do their monitoring</p> <p>There was a discussion on NHS contributions.</p>

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 08th May 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow	Solihull MBC
Jacqui Padbury	Nuneaton and Bedworth BC
Neil Holly	Rugby BC
Mike Dittman	North Warwickshire BC
Chris Egan	Warwickshire County Council
Daniel Taylor	Coventry City Council
Chris Styles	Coventry City Council
Rob Back	Coventry City Council
Jo Bozdoganli (Chair)	Stratford on Avon DC
Amit Bratch	Warwick DC

Apologies:

Clare Eggington CCC
Sarah Matile NBBC
Maria Bailey NBBC
Dorothy Barratt NWBC
Andrew Cornfoot WDC
Richard Thresh HBBC
Hayley Smith RBC

1	<u>Minutes of last CSWAPO meeting, AGM and any matters arising</u> Agreed
2	<u>Changes to the NPPF and planning reform</u> NWBC - Objection to South Staffs and Black Country Local Plan due to concerns over the change to the release of greenbelt for housing and the impact this will have on unmet need. NWBC – Spoke about National Grid’s Network Capacity Map Application showing the connection capacity levels around the region. Link sent around to CSWAPO members.
3	<u>Joint strategic priorities – workstream updates</u> Natural Environment Workstream – Tony Ward setting up meeting – dates tbc. Critical Infrastructure – work progressing. Mike circulated the link relating to the grid and capacity. Transport – No update.

	<p>Water – water cycle study – In the process of being finalised.</p> <p>HEDNA – Meeting 7th June for HEDNA authorities. NH – requested that the WMSESS is also raised.</p>
4	<p><u>MoU / SoCG progress</u></p> <p>No comments</p>
5	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>WCC have meeting set up on Monday 13th May. Can provide update after this.</p>
6	<p><u>JMOG</u></p> <p>WCC have meeting set up on Monday 13th May. Can provide update after this.</p>
7	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <p>Lengthy discussion on the WMSESS study – some amendments underway because of concerns raised regarding integration with the HEDNA. Comments to ICENI needed back by 17th May and NH requested for all LPAs in their comments to raise the point about ensuring the new data can be integrated with the HEDNA.</p>
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – Aiming to undertake Reg 19 Autum 2024. Draft PBSA Market Study report received, with final report expected in a couple of weeks. Commissioned Aspinall Verdi to undertake full plan viability assessment with final report expected in August. • Hinckley and Bosworth – N/A • North Warks – Going through the call for sites responses. Not going to progress with LP at this stage. • Nuneaton – New Assistant Director appointed. First three weeks in July for EiP (potential dates unconfirmed). • Rugby – No update after Issues and options consultation closed. • Solihull - EiP - waiting on inspector following SMBC response to say the updated NPPF does apply in the light of no requirement to release Green Belt. • Stratford and Warwick SWLP – no update, adoption autumn time. Green Belt Review – revised methodology out to CSWAPO members for feedback until 24th May. • Warwick – Net Zero DPD to be taken to cabinet on 15th May and adopt thereafter.

	<ul style="list-style-type: none"> • WCC – no updates
9	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>12 June 2024 Coventry</p> <p>10 July 2024 North Warwickshire</p> <p>14 August 2024 Rugby</p> <p>11 September 2024 Nuneaton and Bedworth</p> <p>9 October 2024 Hinckley and Bosworth</p> <p>13 November 2024 Warwick</p> <p>11 December 2024 Solihull</p> <p>9 January 2025 Stratford on Avon</p>
10	<p><u>AOB:</u></p> <p>N/A</p>

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 12th June 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow	Solihull MBC
Chris Kingham	Nuneaton and Bedworth BC
Jacqui Padbury	Nuneaton and Bedworth BC
Hayley Smith	Rugby BC
Chris Egan	Warwickshire County Council
Daniel Taylor	Coventry City Council
Clare Eggington (Chair)	Coventry City Council
Rob Back	Coventry City Council
John Careford	Stratford on Avon DC
Andrew Cornfoot	Warwick DC
Wendy Hague	Hinckley and Bosworth BC

Apologies:

Jo Bozdoganli SADC

Richard Thresh HBBC

Chris Styles CCC

Neil Holly RBC

1	<u>Minutes of last CSWAPO meeting, AGM and any matters arising</u> Agreed
2	<u>Changes to the NPPF and planning reform</u> No updates.
3	<u>Joint strategic priorities – workstream updates</u> Natural Environment Workstream – Action – Update sought on the green infrastructure strategy from the county council. Looking to consult on Appendix. Critical Infrastructure – No update. Transport – Membership list now updated. Meeting to be arranged. Water – Water Cycle Study - waiting for the final report. HEDNA – Separate meeting for HEDNA authorities after this meeting.
4	<u>MoU / SoCG progress</u> To be updated in line with progress on CCC Local Plan.

5	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>Waiting on data from Local Authorities following the meeting on monitoring collaboration. Next meeting in September.</p>
6	<p><u>JMOG</u></p> <p>Waiting on data from Local Authorities following the meeting on monitoring collaboration. Next meeting in September.</p>
7	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <p>Final draft received and under consideration.</p>
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – Aiming to undertake Reg 19 Autum 2024. Two consultations currently taking place – Warwick University Masterplan Framework (with WDC) and main modifications to HMO document. • Hinckley and Bosworth – Council meeting set for 16th July and 8 week Reg 18 consultation to start on 31st July. Submission aimed for June 2025. Consultation on planning obligations due. • North Warwickshire – No update. • Nuneaton and Bedworth – 9th July for Local Plan EiP. MIQs in progress and due on 17th June. • Rugby – No updates and on track, but subject to any changes that might come out of the recent local election, which saw a change in administration. • Solihull – EiP – no update as still waiting on inspector. • Stratford and Warwick SWLP – Open Space SPD and Gateway SPD adopted. New staff coming in. • Warwick – Warwick Uni Masterplan Framework SPD (with CCC) out to consultation. Net Zero Carbon DPD and associated SPD both adopted by the Council on 15th May. • WCC – no updates
9	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>10 July 2024 – North Warwickshire</p> <p>14 August 2024 – Rugby</p>

	11 September 2024 – Nuneaton and Bedworth
	9 October 2024 – Hinckley and Bosworth
	13 November 2024 – Warwick
	11 December 2024 – Solihull
	9 January 2025 – Stratford on Avon
	12 February 2025 – Coventry
10	<p><u>AOB:</u></p> <p>WDC – appeal decision in Leek Wooton to be circulated for future discussion re. 5YHLS.</p>

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 10th July 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow	Solihull MBC
Mike Dittman (Chair)	North Warwickshire
Jo Bozdoganli	Stratford on Avon DC
Hayley Smith	Rugby BC
Chris Egan	Warwickshire County Council
Daniel Taylor	Coventry City Council
Rob Back	Coventry City Council
Andrew Cornfoot	Warwick DC
Wendy Hague	Hinckley and Bosworth BC
Richard Thresh	Hinckley and Bosworth BC

Apologies:

Clare Eggington CCC
Chris Styles CCC
Neil Holly RBC
Jacqui Padbury NBBC
Sarah Matile NBBC
Maria Bailey NBBC
Dorothy Barratt NWBC

1	<u>Minutes of last CSWAPO meeting, AGM and any matters arising</u> Agreed
2	<u>Changes to the NPPF and planning reform</u> <ul style="list-style-type: none">• Brief run through of the new Labour Government's announcements for planning reform and changes to the NPPF.• Brief discussion on the proposed introduction of a WMCA Regional Strategic Plan, [REDACTED]• NWBC briefly ran through the employment site Public Inquiries the Council is currently dealing with and the potential implications the proposed planning reforms could have, including increased pressure to provide strategic developments like this.• HBBC ran through that Iceni are considering the option of doing an addendum to their Leicester and Leicestershire county wide study for B8 strategic sites. It is essentially a sense check of the current report and looking at junctions most favourable on the motorway network. In the meantime, three Ipas will commission their own bespoke studies for strategic B8 sites.
3	<u>Joint strategic priorities – workstream updates</u>

	<p>Natural Environment Workstream – No amended version of the green infrastructure strategy has yet come back following comments. Question raised on whether the rest of the document can be published while the Appendix is being prepared. ACTION - AC to feed this question back to Tony Ward.</p> <p>Critical Infrastructure / Energy – distribution network raised by NWBC, specifically that National Grid are looking to undertake a survey and would CSWAPO members want to be involved, subject to confirmation of scope and cost. CCC, SADC and WDC said they would be keen to be involved.</p> <p>Transport – Membership list now updated. Meeting is being arranged.</p> <p>Water – Water Cycle Study – ACTION – NWBC to talk to NBBC on whether the final report can now be published.</p>
4	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • To be updated in line with progress on CCC Local Plan and to be in line with agreed HEDNA figures, but employment figures still being calculated. ACTION - CCC to issue their MoU in the coming weeks. • It is assumed CCC MoU would naturally supersede NBBC draft but clarity is sought. ACTION – to be discussed at next meeting.
5	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>No update. WCC still waiting on data from Local Authorities following the meeting on monitoring collaboration. Next meeting in September.</p> <p>ACTION – CSWAPO members to chase up strategic monitoring and to get back to the County by the end of July.</p>
6	<p><u>JMOG</u></p> <p>See comments in agenda 5 above.</p>
7	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <p>Final draft received and under consideration. Timescale for publication to be confirmed.</p> <p>Iceni work has been commissioned – RBC leading on it with the draft report set to be issued on 22nd July and the final report set to be published late August.</p>
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – approval for Reg 19 consultation to be taken to cabinet and council approval in October and consultation to take place as soon after that. Two consultations currently taking place – Warwick University Masterplan Framework (with WDC) and main modifications to HMO document. • Hinckley and Bosworth – Council meeting set for 16th July and Reg 18 consultation to start on 31st July subject to members approval. Meeting on A5 corridor taking place this week.

	<ul style="list-style-type: none"> • North Warwickshire – Still going through employment DPD with draft scheduled to be ready by September. • Nuneaton and Bedworth – Local Plan EiP hearings in train. • Rugby – Council will be looking to revise Local Plan review with a need to update LDS with the new Council administration. • Solihull – EiP – still waiting on inspector to respond to Council’s letters. • Stratford and Warwick SWLP – Report to joint cabinet seeking agreement of housing numbers and asking members to support the use of the HEDNA figures. • Warwick – A healthy number of responses received on the Warwick University Masterplan Framework SPD. • WCC – no updates
9	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>14 August 2024 – Rugby</p> <p>11 September 2024 – Nuneaton and Bedworth</p> <p>9 October 2024 – Hinckley and Bosworth</p> <p>13 November 2024 – Warwick</p> <p>11 December 2024 – Solihull</p> <p>9 January 2025 – Stratford on Avon</p> <p>12 February 2025 – Coventry</p> <p>12 March 2025 – North Warwickshire</p>
10	<p><u>AOB:</u></p> <p>WCC – have the data sets for authorities to validate and determine mineral and waste applications without having to contact the county council, but there is a cost of £600 per authority to be given access to the shape files. ACTION – WCC to provide a note setting out the benefits and justifying the cost so it can be raised with DM colleagues for them to discuss at their cross-boundary meeting.</p>

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 14th August 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow	Solihull MBC
Mike Dittman	North Warwickshire
Jo Bozdoganli	Stratford on Avon DC
Hayley Smith (Chair)	Rugby BC
Chris Egan	Warwickshire County Council
Daniel Taylor	Coventry City Council
Clare Eggington	Coventry City Council
Chris Styles	Coventry City Council
Andrew Cornfoot	Warwick DC
Wendy Hague	Hinckley and Bosworth BC
Chris Kingham	Nuneaton and Bedworth BC

Apologies:

Neil Holly RBC
Jacqui Padbury NBBC
Sarah Matile NBBC
Maria Bailey NBBC
Dorothy Barratt NWBC

AGENDA ITEMS		ACTION
1	<u>Minutes of last CSWAPO meeting, AGM and any matters arising</u> Agreed	
2	<u>Changes to the NPPF and planning reform</u> <ul style="list-style-type: none">• All authorities looking to respond to the NPPF consultation.• All authorities proceeding under current timeframes.• If required to do green belt study to assess grey belt, this has the potential to delay the process for the South Warwickshire authorities.• South Warwickshire authorities' members struggling to accept the HEDNA figures.• New standard method has greatest impact on South Warwickshire authorities.• Coventry's figures significantly different, but now more in line with the HEDNA.	
3	<u>Joint strategic priorities – workstream updates</u>	AC - to feed question back to Tony Ward

	<p>Natural Environment Workstream – the Environmental Group note from Tony Ward was discussed, which seems to suggest the extra work on landscape character assessment / Appendix A would need extra resource / a contribution to complete.</p> <p>No amended version of the green infrastructure strategy has yet come back following comments. Question raised on whether the rest of the document can be published while Appendix A is being prepared.</p> <p>Critical Infrastructure / Energy – NWBC to follow up on distribution networks, specifically that National Grid are looking to undertake a survey. At the July meeting CCC, SADC and WDC said they would be keen to be involved, subject to confirmation of scope and cost.</p> <p>Transport – Meeting was had earlier this week to update membership, particularly on transport plans. The County Council provided an update on the area strategies, which are based around transport but are more holistic touching on aspects such as health. The County Council’s aim is to consult local authorities in the autumn and for the area strategies to be updated every five years.</p> <p>Water – Water Cycle Study – Final study to be issued next week, and if it is uncontentious as anticipated it can be published soon after.</p>	on publishing the green infrastructure strategy and what the position is with Appendix A.
4	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • CCC to issue MoU, to be in line with agreed HEDNA figures, but employment figures still being calculated. • It is assumed CCC MoU would naturally supersede NBBC MoU but draft of CCC MoU needed before this can be confirmed. • C&W HEDNA WMSESS alignment paper issued, and comments required by 23 August for final report to be issued by 2 September. Icení confirm a track changed version of the final report will be issued. • NWBC – alignment paper identifies residual, but they are looking for clarity. • NWBC confirm an appeal decision for a large industrial and logistics scheme was dismissed over harm to the strategic gap, which included the character of the area, the separation of the existing settlements and the loss of high-quality agricultural land, but the inspector said there was an identified need for B8. • Icení to do strategic B8 study in HBBC. 	CCC - to issue MoU
5	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>WCC going through monitoring data from Local Authorities. Next meeting in September.</p>	
6	<p><u>JMOG</u></p> <p>See comments in agenda 5 above. Present data to JMOG on 9th Sept.</p>	
7	<p><u>Employment / Economy including Strategic Employment Site update</u></p>	

	Areas of Search meeting taking place next week for opportunity area 7. Just for authorities within this opportunity area of the WMSESS, but HBBC considered the A5 should be on the radar.	
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> Coventry – continuing with current timeframes following NPPF consultation being published, which is approval for Reg 19 consultation to be taken to cabinet and for consultation to take place by the end of this year. Reminded CSWAPO members of the Council’s viability workshop with Aspinall Verdi. Hinckley and Bosworth – Currently out to Reg 18 consultation, which ends at the end of September, which may need to be extended because of the viability evidence. North Warwickshire – Aiming to commence Reg 18 consultation in September and Reg 19 in the New Year and submission in the summer of 2025. Nuneaton and Bedworth – Currently at examination with second round commencing on 24th September. Gone out to call for sites to address employment need questions, which will be complete by first week in September. Issue raised of equalisation agreement for sites with many landowners and how infrastructure is divided up. Rugby – Will be updating LDS with the new Council administration. Aiming for Reg 18 late this year / early in the New Year. Solihull – EiP – still waiting on inspector to respond to Council’s letters. Stratford and Warwick SWLP – Preferred Options by the end of the year following joint cabinet meeting taking place at the end of August. Once the emerging SAP is aligned with the Preferred Options a new LDS will be issued. Stratford now have a full complement of policy officers. Warwick – A healthy number of responses received on the Warwick University Masterplan Framework SPD and looking to take reports to cabinet in October. WCC – no updates 	<p>All LPAs - provide any policy wording to NBBC that relates to dividing up infrastructure in the context of an equalisation agreement for sites with many landowners.</p>
9	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>11 September 2024 – Nuneaton and Bedworth</p> <p>9 October 2024 – Hinckley and Bosworth</p> <p>13 November 2024 – Warwick</p> <p>11 December 2024 – Solihull</p>	

	<p>9 January 2025 – Stratford on Avon</p> <p>12 February 2025 – Coventry</p> <p>12 March 2025 – North Warwickshire</p> <p>9 April 2025 – Rugby</p>	
10	<p><u>AOB:</u></p> <p>From the July meeting WCC set out that they have the data sets for authorities to validate and determine mineral and waste applications without having to contact the county council, but there is a cost of £600 per authority to be given access to the shape files. This should be raised with DM colleagues for them to discuss at their cross-boundary meetings.</p> <p>HBBC raised the issue that Leicestershire has only two years' worth of sand and gravel land banks, when this should be 7 years, which is relevant in terms of the sustainable development of houses.</p>	<p>WCC to provide a note setting out the benefits and justifying the cost of the mineral and waste data sets.</p> <p>Once note received from WCC All LPAs to raise with DM colleagues for them to discuss at their cross-boundary meetings.</p>

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 11th September 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow	Solihull MBC
Mike Dittman	North Warwickshire
Jo Bozdoganli	Stratford on Avon DC
Hayley Smith	Rugby BC
Chris Egan	Warwickshire County Council
Daniel Taylor	Coventry City Council
Clare Eggington	Coventry City Council
Jasmine Couchman	Coventry City Council
Andrew Cornfoot	Warwick DC
Wendy Hague	Hinckley and Bosworth BC
Sarah Matile (Chair)	Nuneaton and Bedworth BC

Apologies:

Neil Holly RBC
Jacqui Padbury NBBC
Maria Bailey NBBC
Dorothy Barratt NWBC

AGENDA ITEMS		ACTION
1	<p><u>Minutes of last CSWAPO meeting, AGM and any matters arising</u></p> <p>Agreed subject to the following clarifications being made within Section 8 – Updates from each member organisation, under Stratford and Warwick SWLP:</p> <ul style="list-style-type: none"> The date for the joint cabinet meeting for preferred options should state taking place in December 2025 and not at the end of August. The following two sentences relate to Stratford on Avon District only and not to Warwick District: <ul style="list-style-type: none"> <i>Once the emerging SAP is aligned with the Preferred Options a new LDS will be issued. Stratford now have a full complement of policy officers.</i> 	
2	<p><u>Changes to the NPPF and planning reform</u></p> <p>All authorities in the process of responding to the NPPF consultation.</p>	
3	<p><u>Joint strategic priorities – workstream updates</u></p> <p>Natural Environment Workstream – Update from Tony Ward and Dave Lowe is that the Green Infrastructure study is complete, but publication should wait until the WSCIP can be issued with it as an appendix. It is out for comments by the</p>	<p>Chris Egan – to speak to Dave on CSWAPO members' request for the GI</p>

	<p>CSWAPO environment group, with final comments to Dave Lowe, cc'ing in Tony Ward, due by 13th September. CSWAPO members agreed that the main GI document needs to be published now to aid current work streams and for the WSCIP to not be produced as an appendix, but to be published as its own separate document when ready.</p> <p>Critical Infrastructure / Energy – NWBC to follow up on distribution networks, specifically that National Grid are looking to undertake a survey. At the July meeting CCC, SADC and WDC said they would be keen to be involved, subject to confirmation of scope and cost.</p> <p>Transport – No further update after the recent meeting of the group.</p> <p>Water – Water Cycle Study has now been published by NBBC in relation to their EiP. NWBC – New water supply strategy to re-direct water and waste water around the county. HBBC - Seven Trent invited to Leicestershire water supply meeting.</p>	<p>report to be published and for the WSCIP to be issued as a separate document.</p>
4	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • Meeting held last week for HEDNA authorities. • MoU being drafted by CCC but is awaiting the Alignment report before it can be finalised so the level of employment shortfall from Coventry can be clarified. • C&W HEDNA WMSESS Alignment report to be reissued by the 13th Sept following further feedback from Coventry, Warwick and Rugby. • WMSESS Employment study now published on NBBC examination page. 	<p>CCC - to issue MoU, pending the finalising of the alignment paper.</p>
5	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>Taken to JMOG meeting this week, with the County Council's business analyst pulling the monitoring data together from Local Authorities, along with data from AMR's. The intention is to be able to use the data sets strategically and as the basis for AMR's, and to make collecting data less onerous and reduce resource implications.</p>	<p>Chris Egan - to circulate JMOG Minutes and County Council's business analyst's presentation and pro-forma.</p>
6	<p><u>JMOG</u></p> <p>See comments in agenda 5 above.</p>	
7	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <ul style="list-style-type: none"> • WMSESS is now live and waiting on alignment paper for the Coventry and Warwickshire area. • NWBC – waiting on feedback from various stakeholders to see how it feeds into Employment DPD. • HBBC – strategic B8 work being done by Iceni with Iceni asked to liaise with LPAs as cumulative impacts the biggest concern for both Warwickshire and Leicestershire. Freight interchange terminal at Hinckley delayed by SoS to give more time for developer response. Possibility of SOS withholding consent. 	<p>Minutes to be issued to AC for the August Areas of Search meeting for opportunity area 7.</p>

	<ul style="list-style-type: none"> NWBC – response to HBBC Local Plan raising concerns on two major allocations and what the implication of the improvement works to the A5 in both Warwickshire and Leicestershire could have on funding on NWBC allocations. NBBC call for sites ends on Monday 16th September. CCC call for employment sites ends on 20th September. 	
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> Coventry – preparation of Reg 19 plan ongoing and to be taken to cabinet later this year. Awaiting Inspectors report on HMO DPD. On going work with WDC on University of Warwick SPD. CCC is progressing Reg 19 Local Plan review to use the HEDNA local need figures with the 35% uplift removed. Hinckley and Bosworth – Reg 18 consultation ongoing until the end of September. North Warwickshire – Aiming to commence Reg 18 consultation at end of September / beginning of October, Reg 19 in the New Year and submission in the summer of 2025 (Employment DPD). Nuneaton and Bedworth – Currently at examination with second round on employment commencing on 24th September and third round on housing commencing on 8th October. Gone out to call for sites to address employment need questions, which will be complete by 13 September. Rugby – Will be updating LDS at cabinet in October. Aiming for Reg 18 in March 2025. Solihull – EiP – response from inspectors recommends that the council withdraw the local plan review as it would not be found sound. This will need to be authorised by full council at the 8th October meeting. It is expected that the decision will be to progress with a new local plan. Stratford on Avon – Progressing Preferred Options with joint cabinet meeting with WDC taking place in December. Warwick – Progressing Preferred Options with joint cabinet meeting with SADC taking place in December. On going work with CCC on University of Warwick SPD. WCC – no updates 	
9	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>9 October 2024 – Hinckley and Bosworth</p> <p>13 November 2024 – Warwick</p>	

	<p>11 December 2024 – Solihull</p> <p>9 January 2025 – Stratford on Avon</p> <p>12 February 2025 – Coventry (AGM)</p> <p>12 March 2025 – North Warwickshire</p> <p>9 April 2025 – Rugby</p> <p>14 May 2025 – Nuneaton and Bedworth</p>	
10	<p><u>AOB:</u></p> <p>WCC – November dates for County Council HIA workshop released. Chris Egan to send invites on.</p> <p>WCC – Chris Egan confirmed he is still to provide a note setting out the benefits and justifying the cost of the mineral and waste data sets. This is from the July meeting where WCC set out that they have the data sets for authorities to validate and determine mineral and waste applications without having to contact the county council, but there is a cost of £600 per authority to be given access to the shape files. Once the benefit and cost justification note is received from WCC this should be raised with DM colleagues for them to discuss at their cross-boundary meetings.</p>	

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 09th October 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow	Solihull MBC
Mike Dittman	North Warwickshire
Jo Bozdoganli	Stratford on Avon DC
Neil Holly	Rugby BC
Daniel Taylor	Coventry City Council
Rob Back	Coventry City Council
Richard Thresh (chair)	Hinckley and Bosworth BC
Sarah Matile	Nuneaton and Bedworth BC

Apologies:

Clare Eggington CCC

Andrew Cornfoot WDC

AGENDA ITEMS		ACTION
1	<u>Minutes of last CSWAPO meeting, AGM and any matters arising</u> Agreed.	
2	<u>Changes to the NPPF and planning reform</u> No update.	
3	<u>Joint strategic priorities – workstream updates</u> Natural Environment Workstream – No update since last meeting where Tony Ward and Dave Lowe recommended that the Green Infrastructure study should not be published until the WSCIP can be issued with it as an appendix. CSWAPO members agreed that the main GI document needs to be published now to aid current work streams and for the WSCIP to be published as its own separate document when ready. Critical Infrastructure / Energy – NWBC provided an update on solar farms and if there are any deficiencies in the grid it is up to individual authorities to raise this with National Grid. No update on distribution networks, specifically that National Grid are looking to undertake a survey. At the July meeting CCC, SADC and WDC said they would be keen to be involved, subject to confirmation of scope and cost.	Jo Bozdoganli – to email Dave Lowe and Chris Egan to see about getting the GI report published now and the WSCIP issued as a separate document.

	<p>Transport – No further update after the recent meeting of the group. In relation to South Leicestershire, HBBC provided an update that the A5 traffic modelling and workshop have been completed. HBBC to see if they can share the final report.</p> <p>Water – No update from last meeting.</p>	
4	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • CCC circulated draft MoU for comments. • CSWAPO members considered that a strategic plan is not needed with local plans able to cover it. • DtC meeting taking place next week to discuss. • NWBC has been asked to commit to a joint strategic housing market assessment (SHMA). Other CSWAPO members support a joint strategy subject to understanding the scope, brief and timescales. • WDC are leading on it / writing the brief. • The current understanding is that the SHMA will update the HEDNA with more detail on tenures and affordable housing. 	<p>NWBC - to respond on the SHMA requesting the brief and timescales and to send this on to CSWAPO members.</p>
5	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <p>JMOG minutes and the County Council's business analyst's presentation and pro-forma were circulated and the standardisation is being progressing by the County Council.</p>	<p>Mike Dittman – to take minutes at next JMOG meeting and to send onto and report back to CSWAPO.</p>
6	<p><u>JMOG</u></p> <p>See comments in agenda 5 above.</p>	
7	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <p>No update or feedback other than the WMSESS and the alignment paper have now been published.</p>	
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – Timetable pushed back by two weeks, but Reg 19 plan still to be taken to cabinet later this year. • Hinckley and Bosworth – Reviewing responses from Reg 18 consultation. To go under current system with Reg 19 in the new year. • North Warwickshire – delay to commencement of Reg 18 consultation, but still aiming to carry it out this year, with Reg 19 in the New Year and submission in the summer of 2025 (Employment DPD). • Nuneaton and Bedworth – finished EiP hearings yesterday and now waiting on inspectors. 	

	<ul style="list-style-type: none"> • Rugby – new LDS published. Reg 18 starting in March 2025 and Reg 19 targeted for the start of 2026. • Solihull – full council agreed to withdraw the plan and to start work on a new plan. Timetable yet to be established. • Stratford on Avon – Progressing Preferred Options to take place in the new year with joint cabinet meeting with WDC taking place in December. • Warwick – N/A • WCC – N/A 	
9	<p><u>Dates of next meeting</u></p> <p>Future meetings dates and chairs:</p> <p>13 November 2024 – Warwick</p> <p>11 December 2024 – Solihull</p> <p>9 January 2025 – Stratford on Avon</p> <p>12 February 2025 – Coventry (AGM)</p> <p>12 March 2025 – North Warwickshire</p> <p>9 April 2025 – Rugby</p> <p>14 May 2025 – Nuneaton and Bedworth</p> <p>11 June 2025 – Hinckley and Bosworth</p>	
10	<p><u>AOB:</u></p> <p>County Council HIA workshop to be held on 13th November in Nuneaton.</p> <p>Update needed at next CSWAPO meeting from Chris Egan on a note setting out the benefits and justifying the cost of the mineral and waste data sets. This is from the July meeting where WCC set out that the data sets are available for authorities to validate and determine mineral and waste applications without having to contact the county council. [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 13th November 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow	Solihull MBC
Mike Dittman	North Warwickshire
Jo Bozdoganli	Stratford on Avon DC
Neil Holly	Rugby BC
Daniel Taylor	Coventry City Council
Chris Styles	Coventry City Council
Clare Eggington	Coventry City Council
Andrew Cornfoot (Chair)	Warwick DC
Chris Egan	Warwickshire CC
Jacqui Padbury	Nuneaton and Bedworth BC
Andrew Donnelly (for item 1 only)	Metropolitan Authorities Support
Ian Culley (for item 1 only)	Lead Planning Manager, Wolverhampton City Council
Gurdip Nagra (for item 1 only)	Principal Planner WMCA
Leo Pollak (for item 1 only)	Head of Policy and Planning WMCA

Apologies:

Richard Thresh and Wendy Haque (HBBC)

[illegible]

	<ul style="list-style-type: none"> • [REDACTED] 	
2	<p><u>Minutes of last CSWAPO meeting, AGM and any matters arising</u></p> <p>Agreed.</p>	
3	<p><u>Changes to the NPPF and planning reform</u></p> <p>Current understanding from the Government is that the aim is to publish the new NPPF by the end of the year.</p>	
4	<p><u>Joint strategic priorities – workstream updates</u></p> <p>Natural Environment Workstream – Dave Lowe responded and agreed to publish the main GI document now and for the WSCIP to be published as its own separate document when ready. As a result:</p> <ul style="list-style-type: none"> • SADC / WDC to publish it on their website as part of their Reg 18. • CCC will publish it as part of their Reg 19. • NBBC have forwarded to their EiP programme officer and waiting to hear back from inspector. <p>CCC advised David Lowe sent an email regarding BNG in practice – more for DM officers but may be of interest to policy officers.</p> <p>Critical Infrastructure / Energy – National Grid consultations on regeneration to start. No update on distribution networks or the survey National Grid are looking to undertake. At the July meeting CCC, SADC and WDC said they would be keen to be involved, subject to confirmation of scope and cost.</p> <p>Presentation from Seven Trent on transfer of water.</p> <p>Transport – No update.</p> <p>Water – No update.</p>	<p>Clare Eggington - to circulate the email about BNG from David Lowe.</p>
5	<p><u>MoU / SoCG progress</u></p>	

	<ul style="list-style-type: none"> Meeting on 26th November 2024 at 1pm to discuss. All parties to whom the MoU applies had now accepted the invite. NBBC and WDC had commented on the most recent draft, any further comments from LAs send to Chris S and Clare E asap. NWBC – nothing received on the joint strategic housing market assessment (SHMA) and no details of a brief or timescales. Some other CSWAPO members potentially support a joint strategy subject to understanding the scope, brief and timescales. Further information needed. The understanding is that the SHMA will update the HEDNA, but with more detail on tenures and affordable housing. 	
6	<p><u>C&W strategic monitoring, reporting and future role of JMOG</u></p> <ul style="list-style-type: none"> Next JMOG meeting on 9th December. It was agreed that JMOG minutes and actions should continue to be circulated to CSWAPO for discussion. 	
7	<p><u>JMOG</u></p> <p>See comments in agenda 5 above.</p>	<p>This item to be deleted for future meetings as it is covered in item 6 and for item 6 to be re-titled: 'Strategic Monitoring including JMOG Feedback'</p>
8	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <ul style="list-style-type: none"> The Alignment Paper addendum, which corrected inaccuracies in the Alignment Paper was circulated on 22nd October. NBBC forwarded the Alignment Paper and addendum to their EiP Programme Officer for consideration to add them to the Council's documents for the Examination. The Alignment paper was added to the Programme Officer's webpage but NBBC are waiting on a response as to whether the Inspectors will accept the addendum and the Green Infrastructure Document. Before Authorities publish the Alignment Paper it has been agreed that it should incorporate the corrections in the addendum so there is only one document. 	<p>Neil Holly – to email Lauren at ICENI to ask for the corrections in the addendum to be incorporated into the main Alignment Report.</p>

	<ul style="list-style-type: none"> NWBC doing separate work with ICENI where there could be four strategic sites coming forward and to be published in the new year. 	
9	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> Coventry – To carry out Local Plan Reg 19 consultation in January following approval from Cabinet and Council meetings in December and January. Hinckley and Bosworth – to provide update at next meeting. North Warwickshire – Employment DPD Reg 19 to take place in February under new NPPF. Nuneaton and Bedworth – finished EiP hearings. Sent suggested modifications and waiting on Inspectors’ response before going out to consultation on the modifications. Rugby – Still planning to commence Reg 18 in March 2025 following cabinet meeting on 2nd March. Solihull – Local Plan formally withdrawn. Call for sites to be carried out before Christmas to seek additional housing land. Stratford on Avon – Going to joint cabinet meeting with WDC in December, then Reg 18 consultation to commence in January 2025. Material will be in the public domain from 21st November. Going under new NPPF and new Standard Method. Warwick – same as Stratford on Avon above. WCC – No update 	
10	<p><u>Dates of future meetings and the chairs</u></p> <p>11 December 2024 – Solihull</p> <p>9 January 2025 – Stratford on Avon</p> <p>12 February 2025 – Coventry (AGM)</p> <p>12 March 2025 – North Warwickshire</p> <p>9 April 2025 – Rugby</p> <p>14 May 2025 – Nuneaton and Bedworth</p> <p>11 June 2025 – Hinckley and Bosworth</p>	

	9 July 2025 – Warwick	
11	<p><u>AOB</u></p> <p>Chris Egan - Note setting out the benefits and justifying the cost of the mineral and waste data sets is with a colleague (Paul Wilcox) who will circulate ASAP. This was first discussed at the July meeting.</p> <p>Chris Egan – County Council HIA meeting was well received in terms of seeing the benefits of using HIAs for assessing health in the planning system and it was agreed to continue the conversation. WDC, SADC, NBBC, NWBC attended. Discussions included whether HIAs could be integrated into the NPPF process; whether a county wide standard advisory note could be produced on the use of HIAs for submitted applications; the use of thresholds; and whether to make them topic specific / targeted so they are not all encompassing. County to absorb feedback and consider how to develop policy before going back to the LAs. CCC has strengthened its HIA policy in the Local Plan as part of the review process and is updating its HIA SPD to make it more proportionate and targeted.</p> <p>NWBC – to send employment sites north of Meriden onto Solihull.</p> <p>NBBC – looking at new Green Belt study as figures are more than 200 out and asked about doing a sub-regional joint study. Most authorities have already commenced their own studies. RBC and NWBC commissioned LUC. WDC and SADC commissioned Arup, which will be made public as part of their Preferred Options. CSWAPO were consulted on the methodology and WDC and SADC would welcome input on other authorities' studies.</p> <p>NBBC – Asked about income generators in terms of policy. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]</p>	

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 11th December 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow (chair)	Solihull MBC
Mike Dittman	North Warwickshire
Jo Bozdoganli	Stratford on Avon DC
Hayley Smith	Rugby BC
Daniel Taylor	Coventry City Council
Rob Back	Coventry City Council
Clare Eggington	Coventry City Council
Andrew Cornfoot	Warwick DC
Chris Egan	Warwickshire CC
Jacqui Padbury	Nuneaton and Bedworth BC

AGENDA ITEMS		ACTION
1	<u>Introduction and apologies</u> Apologies: Richard Thresh – Hinckley and Bosworth Borough Council	
2	<u>Minutes of last CSWAPO meeting, AGM and any matters arising</u> Agreed.	
3	<u>Planning Reform and strategic planning discussion</u> <ul style="list-style-type: none">• Questionnaire sent round to LPAs seeking views and opinions.• A5 members meeting with National Highways held. NWBC raised concerns on the circumstances around the infrastructure.• Given the biodiversity off setting hierarchy, LPAs would need to be mindful of this in the strategic planning context.• LPAs to be mindful when working with different geographies.	
4	<u>HMA / FEMA DtC discussion</u> Clare E – MoU is being redrafted and a session to discuss this is planned for immediately after January's CSWAPO meeting.	
5	<u>Changes to the NPPF and planning reform</u> No comments raised. NPPF expected to be published Thursday 12 th December.	

6	<p><u>Joint strategic priorities – workstream updates</u></p> <p>Natural Environment Workstream – Email about BNG in practice from David Lowe was circulated by Clare E – more for DM officers but may be of interest to policy officers.</p> <p>Critical Infrastructure / Energy – MD – no update since last meeting, which includes on National Grid’s consultation on regeneration, distribution networks and the survey National Grid are looking to undertake to potentially be sent round to LPAs.</p> <p>Transport – Clare E chasing Highway colleagues and Chris E to chase County Highways.</p> <p>Water – JP – asked around the group for a meeting, but no response, which may be down to the main workstreams having now been completed.</p> <p>MD – Changes to flood guidance and zones from EA might be relevant for the water group. Potential PAS event on changes.</p> <p>Nature Recovery Strategy – JB – meeting held this morning with the aim to adopt the strategy this time next year. Not many planners at the meeting, but it has links to planning and a role for CSWAPO should be established.</p> <p>MD – sit in on ENCAP meetings, which overlays with the West Midlands and Coventry and Warwickshire.</p> <p>Role of the workstream groups – progress and outcomes vary. It was considered that workstreams work well when there is active engagement from a lead from CSWAPO. This retains ownership and relevance for planning. Where they work less well is when there is no leadership from CSWAPO or planners. The workstream groups were still seen as useful but may need a refresh of topics as well as membership and leadership. It was agreed to use the AGM in February to look at this and for this to be in person.</p>	<p>Chris E - to feed back to Dave Lowe on establishing a role for CSWAPO on the Nature Recovery Strategy given its links to planning.</p>
7	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • CCC will incorporate changes suggested in the comments sent from LPAs and from the meeting held on 26th November. 	
8	<p><u>Strategic monitoring including JMOG feedback</u></p> <ul style="list-style-type: none"> • Chris E circulated the papers from the 9th December JMOG meeting where proposals were received positively. • It is proposed for data to be instantly available and used and shared amongst CWSAPO authorities and for updates to be sent regularly throughout the year. 	

	<ul style="list-style-type: none"> • County Council looking into best practice when it comes to monitoring and will be picked up at next meeting in February. • How to integrate GIS into the system so the data can be linked back to planning applications is also being investigated. • It was agreed to use single definitions across the whole of Warwickshire, given that the different authorities currently use different definitions, which can cause confusion. 	
9	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <ul style="list-style-type: none"> • To show actions going forward. • Opportunity Area 5 – NWBC doing separate work with ICENI regarding their own need. Four strategic sites potentially coming forward, which will feed into the Employment DPD. • SADC picking Opportunity Area up in Local Plan consultation and therefore not doing a separate DPD. • Opportunity Area 7 – RBC working through sites, some being strategic in scale. These to be included in the Local Plan allocations via the Local Plan consultation and therefore not doing a separate DPD. 	
10	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – Local Plan Reg 19 and LDS went to cabinet on 10 December and where approved to progress to Council on 14 January. Reg 19 consultation to commence in Jan. Warwick University Campus Framework Masterplan SPD adopted with WDC. • Hinckley and Bosworth – to provide update at next meeting. • North Warwickshire – Employment DPD evidence base delayed but still aiming for Employment DPD Reg 19 to take place in February under new NPPF. • Nuneaton and Bedworth – Inspector post hearing notes received where the Local Plan has been found sound subject to inclusion of main modifications. Consultation on main mods to take place in January after they been included in the HRA and SA. Aiming for a Spring adoption. • Rugby – Still planning to commence Reg 18 in March 2025 following cabinet meeting on 2nd March. • Solihull – Launched call for sites, which will run until the end of January. LDS being prepared for approval. 	

	<ul style="list-style-type: none"> Stratford on Avon – targeted call for sites on new settlement locations; Gypsy and Traveller sites; and renewal energy sites ongoing. Joint cabinet meeting with WDC on Reg 18 consultation same as Warwick update below. Warwick – joint cabinet meeting with SADC on Local Plan on 12th December. Issues and Options public consultation to be carried out from 10th January to 7th March. Material now in the public domain with the plan taking forward more sites than is needed. Warwick University Campus Framework Masterplan SPD adopted with CCC. WCC – No update 	
11	<p><u>AOB</u></p> <p>Chris E - Finance report to be taken to AGM.</p> <p>SADC keen to engage with a CSWAPO / county wide approach to Gypsy and Traveller stop over areas.</p> <p>NWBC supports incentives for a county wide approach to Gypsy and Traveller stop off areas as police are struggling to direct gypsy and travellers to emergency stop off areas.</p>	<p>Chris Egan – to provide note setting out the benefits and justifying the cost of the mineral and waste data sets. Last update: with a colleague [REDACTED] to circulate ASAP. First discussed at July meeting.</p>
12	<p><u>Dates of future meetings and the chairs</u></p> <p>8 January 2025 – Stratford on Avon</p> <p>12 February 2025 – Coventry (AGM) – in person at One Friargate, Coventry, CV1 2GN</p> <p>12 March 2025 – North Warwickshire</p> <p>9 April 2025 – Rugby</p> <p>14 May 2025 – Nuneaton and Bedworth</p> <p>11 June 2025 – Hinckley and Bosworth</p> <p>9 July 2025 – Warwick</p> <p>13 August 2025 – Solihull</p>	

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 08th January 2025

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Maurice Barlow	Solihull MBC
Mike Dittman	North Warwickshire
Dorothy Barratt	North Warwickshire
Jo Bozdoganli (chair)	Stratford on Avon DC
Hayley Smith	Rugby BC
Neil Holly	Rugby BC
Daniel Taylor	Coventry City Council
Clare Eggington	Coventry City Council
Andrew Cornfoot	Warwick DC
Chris Egan	Warwickshire CC
Jacqui Padbury	Nuneaton and Bedworth BC

AGENDA ITEMS		ACTION
1	<u>Introduction and apologies</u> Apologies: Chris Styles – Coventry City Council Rob Back – Coventry City Council Richard Thresh – Hinckley and Bosworth Borough Council	
2	<u>Minutes of last CSWAPO meeting and any matters arising</u> Agreed.	
3	<u>Changes to the NPPF and planning reform</u> <ul style="list-style-type: none">• Planning Infrastructure Bill due in the next two / three months.• Green Belt review funding for Councils:<ul style="list-style-type: none">○ [REDACTED]	To have devolution and reform as a standing agenda item.

	<ul style="list-style-type: none"> ■ [REDACTED] <p>Devolution</p> <ul style="list-style-type: none"> • The intention is for new unitary authorities to be in place by 2027 and for initial council structures to be in place in 2026. • It was considered beneficial for CSWAPO to start to discuss this in terms of what it could mean for strategic planning in Warwickshire. 	
4	<p><u>Joint strategic priorities – workstream updates</u></p> <p>There were no current updates from the workstreams and the role of the workstream groups is to be reviewed and discussed at February's meeting, including who would be the active lead from CSWAPO to maximum the planning relevance.</p> <p>Outstanding action that needs resolving in the 'actions' column.</p>	Chris E - to feed back to Dave Lowe on establishing a role for CSWAPO on the Nature Recovery Strategy given its links to planning.
5	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • Separate meeting to follow CSWAPO. 	
6	<p><u>Strategic monitoring and JMOG feedback</u></p> <ul style="list-style-type: none"> • No update since 9th December meeting which discussed: <ul style="list-style-type: none"> ○ for data to be instantly available, used and shared amongst CWSAPO authorities and for updates to be sent regularly throughout the year; ○ best practice when it comes to monitoring; and ○ how to integrate GIS into the system so the data can be linked back to planning applications. • The next meeting is in February. 	
7	<p><u>Employment / Economy including Strategic Employment Site update</u></p> <ul style="list-style-type: none"> • No update. 	
8	<p><u>Updates from each member organisation</u></p>	

10	<p><u>Dates of future meetings and the chairs</u></p> <p>12 February 2025 – Coventry (AGM) – in person at One Friargate, Coventry, CV1 2GN</p> <p>12 March 2025 – North Warwickshire</p> <p>9 April 2025 – Rugby</p> <p>14 May 2025 – Nuneaton and Bedworth</p> <p>11 June 2025 – Hinckley and Bosworth</p> <p>9 July 2025 – Warwick</p> <p>13 August 2025 – Solihull</p> <p>10 September 2025 – Stratford on Avon</p>	
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Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 12th February 2025

Venue: Meeting conducted in person at One Friargate, Coventry

Attendees

Maurice Barlow	Solihull MBC
Mike Dittman	North Warwickshire BC
Jo Bozdoganli	Stratford on Avon DC
Neil Holly	Rugby BC
Daniel Taylor	Coventry City Council
Clare Eggington (chair)	Coventry City Council
Chris Styles	Coventry City Council
Jasmine Couchman	Coventry City Council
Andrew Cornfoot	Warwick DC
Chris Egan	Warwickshire CC
Sarah Matile	Nuneaton and Bedworth BC

Minutes

AGENDA ITEMS		ACTION
1	<p><u>Introduction and apologies</u></p> <p>Apologies:</p> <p>Dorothy Barratt – North Warwickshire</p>	
2	<p><u>Minutes of last CSWAPO meeting and any matters arising</u></p> <p>Agreed.</p>	
3	<p><u>Workstream Review Workshop</u></p> <p>Consensus was that the workstream groups have served their purpose given the strategic evidence they were set up to provide has now been largely published, such as the HEDNA and employment land review and given different regional groups have now replaced a lot of the priorities of the workstreams, such as:</p> <ul style="list-style-type: none"> • WM Development Needs group • National capital investment • SDS guidance • City Council and WMCA and WCC Highways departments <p>It was agreed that strategic joined up working needed to continue with priorities currently being</p> <p>1. Climate Change</p>	<p>Chris E – chase up transport note at WCC.</p> <p>Chris E – to report back after discussing with Dave Lowe on establishing a role for CSWAPO on the Nature</p>

	<p>2. Employment (Local employment need and strategic)</p> <p>3. Environment</p> <p>4. Growth, housing and Gypsy & Traveller accommodation</p> <p>5. Strategic Infrastructure and transport</p> <p>These would be standing items on the agenda, and bringing in specialists on particular topics as required, and where shared evidence might be needed. Within this, task and finish groups might be required on certain issues</p> <p>Leads to be notified of the groups being disbanded and to thank them for their work.</p>	<p>Recovery Strategy given its links to planning.</p> <p>Clare to notify groups</p>
4	<p><u>Changes to the NPPF, devolution and planning reform</u></p> <ul style="list-style-type: none"> • NPPF has been updated – minor corrections • NWBC advised they will comment but will not actively contribute to housing for the forthcoming Local Plan review due to their being no additional capacity in NWBC unless infrastructure upgrades and the spending review for the A5 is committed to. • Biggest issue is unlocking funding for infrastructure to enable development. • Planning and infrastructure paper to be published next month. Key issue is SDS. • Detail on grey belt critical. 	
5	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • CCC incorporated the amendments from the DtC sub-group into the draft MoU. • CCC proceeding with MoU and will need SoCG on individual policy areas / with individual stakeholders. • CCC will send out a formal letter in terms of its employment shortfall to each FEMA authority in the form of a letter and attaching the MoU. • CCC will confirm a deadline for responses in the letter 	
6	<p><u>Strategic monitoring and JMOG feedback</u></p> <ul style="list-style-type: none"> • First meeting this year will be in April. 	
7	<p><u>Employment Site Progress</u></p> <ul style="list-style-type: none"> • NWBC – Employment DPD has been delayed while waiting on information like defining grey belt land. • See above re Coventry shortfall letter • Strategic employment sites being considered through plan making processes – further discussion needed 	

8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – Out to Local Plan Reg 19 consultation until 3rd March. HMO DPD has been found sound and looking to adopt at Council on 25th March. • Hinckley and Bosworth – to provide update at next meeting. • North Warwickshire – Employment DPD Reg 19 to take place in February under new NPPF. New LDS and Local Plan Review to then be considered. • Nuneaton and Bedworth – aim to go out to consultation on main modifications at the end of March. Looking at adoption in September. Gearing up for preparing the new Local Plan. • Rugby – Aiming to commence Reg 18 on 24th March 2025, which will include full draft allocations. • Solihull – Call for sites ended with 300 submissions received, many of which are in the Green Belt and are now reviewing them. • Stratford on Avon (SWLP) – Out to Reg 18 consultation until 7th March. LDS going to March cabinet meeting. Site allocations plan to progress as part of the new Local Plan meaning the SAP could be withdrawn. • Warwick (SWLP) – Out to Reg 18 consultation until 7th March. LDS updated and approved at Cabinet last week. • WCC – No update 	
9	<p><u>AOB</u></p> <p>Mineral and waste data sets – needs chasing up</p> <p>Green Belt review funding – Majority of CSWAPO authorities applied, but none have heard back.</p>	<p>Chris E – to see if [REDACTED] who is producing a note setting out the benefits and justifying the cost of the mineral and waste data sets, can attend the March meeting to provide an</p>

		update. First discussed at the July meeting.
10	<u>Dates of future meetings and the chairs</u> 12 March 2025 – North Warwickshire 9 April 2025 – Rugby 14 May 2025 – Nuneaton and Bedworth 11 June 2025 – Hinckley and Bosworth 9 July 2025 – Warwick 13 August 2025 – Solihull 10 September 2025 – Stratford on Avon 8 October 2025 – Coventry	

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) AGM

Date: 12th February 2025

Venue: Meeting conducted in person at One Friargate, Coventry

Attendees

Maurice Barlow	Solihull MBC
Mike Dittman	North Warwickshire BC
Jo Bozdoganli	Stratford on Avon DC
Neil Holly	Rugby BC
Daniel Taylor	Coventry City Council
Clare Eggington (chair)	Coventry City Council
Chris Styles	Coventry City Council
Jasmine Couchman	Coventry City Council
Andrew Cornfoot	Warwick DC
Chris Egan	Warwickshire CC
Sarah Matile	Nuneaton and Bedworth BC

Minutes

AGENDA ITEMS		ACTION
1	<u>Introduction and apologies</u> Apologies: Dorothy Barratt – North Warwickshire	
2	<u>Appointment of Officers</u> <ul style="list-style-type: none"> Secretary – Coventry Treasurer – WCC Chair – revolving between member authorities 	
3	<u>Treasurer's Report</u> Statement of Account circulated and agreed. Budget to be reviewed by CSWAPO and potentially considered for training and for advice and guidance on planning reform.	Ahead of using budget, it should be investigated who originally paid in.
4	<u>AOB</u> N/A	
5	<u>Dates of future meetings</u> AGM to be held February 2026 – venue TBC	

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 12th March 2025

Venue: Online via Teams

Attendees

Maurice Barlow	Solihull MBC
Mike Dittman (chair)	North Warwickshire BC
Jo Bozdoganli	Stratford on Avon DC
Hayley Smith	Rugby BC
Daniel Taylor	Coventry City Council
Clare Eggington	Coventry City Council
Rob Back	Coventry City Council
Andrew Cornfoot	Warwick DC
Chris Egan	Warwickshire CC
Jacqui Padbury	Nuneaton and Bedworth BC

Minutes

AGENDA ITEMS		ACTION
1	<p><u>Introduction and apologies</u></p> <p>Apologies:</p> <p>Dorothy Barratt – North Warwickshire Kirstie Rea – Hinckley and Bosworth</p>	
2	<p><u>Minutes of last CSWAPO meeting and any matters arising</u></p> <p>Agreed.</p> <p>Run through of actions from last meeting:</p> <ul style="list-style-type: none"> Chris E sent the note around from Paul Wilcox on the mineral and waste data sets, including costs. Considered beneficial for David Lowe to be invited to the next meeting to update the group on various aspects of the nature conservation work of WCC and how this links with planning policy and monitoring across the sub-region, including: <ul style="list-style-type: none"> Nature Recovery Strategy Natural Capital Investment Strategy Green Infrastructure Strategy – timescales/scope/cost for Annex 2 re: Landscape Character BNG Monitoring Report requirements resulting from the Env Act – scope for sub-regional approach to monitoring and reporting. MD – Dave Lowe is doing a monitoring report for the county. 	<p>All – review minerals and waste note from WCC for discussion at next meeting.</p> <p>JB – to invite David Lowe to April CSWAPO meeting.</p> <p>Chris E – to follow up with Dave Lowe to establish a role for CSWAPO on the Nature</p>

	<ul style="list-style-type: none"> • MD to lead on NCAP meeting updates and to invite NBBC. • JP – biodiversity monitoring from next March will require policy and PPG input. Question what happens when DEFRA funding ends. 	Recovery Strategy given its links to planning.
3	<p><u>Changes to the NPPF, devolution and planning reform</u></p> <ul style="list-style-type: none"> • Authorities digesting Planning and Infrastructure bill. 	
4	<p><u>Workstream Review Workshop</u></p> <p>Item to be changed to the following priority topics:</p> <ol style="list-style-type: none"> 1. Climate Change 2. Employment (Local employment need and strategic) 3. Environment 4. Growth, housing and Gypsy & Traveller accommodation 5. Strategic Infrastructure and transport 	Chris E – chase up transport note at WCC.
5	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • CCC sent MoU and letter regarding its employment shortfall to FEMA authorities on 13th February and asked for responses to be submitted within a month. It was agreed that this could be extended to the 28th March to give authorities adequate time to respond through their respective governance channels. 	
6	<p><u>Strategic monitoring and JMOG feedback</u></p> <ul style="list-style-type: none"> • Power BI monitoring dataset shared with JMOG. • Next meeting on 31st March. 	Chris E – to follow up to ensure all links work.
7	<p><u>Employment Site Progress</u></p> <ul style="list-style-type: none"> • It was agreed that a specific working group should be set up given the varying employment land issues across all local authorities. 	Clare E – to organise a date for the working group.
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – Reg 19 finished and now going through responses. HMO DPD has been found sound and looking to adopt at Council on 25th March. • Hinckley and Bosworth – to provide update at next meeting. • North Warwickshire – New LDS was agreed on 26th February confirming the go ahead for the local plan review, which will be a focused review looking at policies that need changing / are not NPPF compliant. It will include a review on Gypsy and traveller 	

	<p>sites. Employment DPD Reg 19 to continue and looking to go out to consultation in the autumn.</p> <ul style="list-style-type: none"> • Nuneaton and Bedworth – agreeing final modifications with inspectors before carrying out a 6-week consultation. New LDS approved for both the current local plan review and the new local plan. • Rugby – Aiming to take the local plan to Full Council meeting on 19th March and to commence Reg 18 consultation on 24th March, for 8 weeks. • Solihull – Reviewing the call for sites submissions. • Stratford on Avon (SWLP) – Reg 18 consultation finished on 7th March and now going through responses. LDS was approved at the March cabinet meeting. • Warwick (SWLP) – Reg 18 consultation finished on 7th March and now going through responses. • WCC – No update 	
9	<p><u>AOB</u></p> <p>FOI request for all CSWAP0 papers from January 2023. Agreed these would be provided, Coventry would co-ordinate to save time as this had been received by others too.</p> <p>MD – additional item for next meeting to discuss Gypsy and Traveller needs. Organise for WCC to give an update at the April meeting following the needs assessment that has been undertaken on a County wide basis.</p>	<p>CCC – to respond to FOI and send papers off.</p> <p>MD – to invite Jeff May, WCC Service Manager for Gypsy and Travellers, to provide an update at the April meeting.</p>
10	<p><u>Dates of future meetings and the chairs</u></p> <p>9 April 2025 – Rugby</p> <p>14 May 2025 – Nuneaton and Bedworth</p> <p>11 June 2025 – Hinckley and Bosworth</p> <p>9 July 2025 – Warwick</p> <p>13 August 2025 – Solihull</p> <p>10 September 2025 – Stratford on Avon</p>	

	8 October 2025 – Coventry 12 November 2025 – North Warwickshire	
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Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 09th April 2025

Venue: Online via Teams

Attendees

Mike Dittman	North Warwickshire BC
Jo Bozdoganli	Stratford on Avon DC
Neil Holly (chair)	Rugby BC
Daniel Taylor	Coventry City Council
Chris Styles	Coventry City Council
Andrew Cornfoot	Warwick DC
Tony Ward	Warwick DC
Sarah Matile	Nuneaton and Bedworth BC
Chris Egan	Warwickshire CC
Tabitha Stratton	Warwickshire CC
Jeff May (for item 2)	Warwickshire CC Service Manage for Gypsy and Travellers
David Lowe (for item 3)	Warwickshire CC Service Manager Ecology, Historic Environment & Landscape

Minutes

AGENDA ITEMS		ACTION
1	<p><u>Introduction and apologies</u></p> <p>Apologies:</p> <p>Clare Eggington – Coventry City Council Dorothy Barratt – North Warwickshire Kirstie Rea – Hinckley and Bosworth</p>	
2	<p><u>WCC county wide Gypsy and Traveller needs update - Jeff May</u></p> <ul style="list-style-type: none"> • A potential need in the County for 200 pitches (though a full GTAA hasn't been carried out) and a need for transit sites. • Including pitches as part of housing sites has been explored. • Negotiated stopping places needs a County wide coordinated approach taking account of routes used by Gypsy and Travellers. • Given the county-wide need and the cost implications of providing pitches, a series of meetings to look at how to address the need between the Warwickshire authorities and the County Council would be beneficial. CCC's attendance would be optional. • An MoU could be beneficial or a Warwickshire DPD. 	<p>NH - to set up a meeting between all Warwickshire authorities and the County Council.</p>

3	<p><u>WCC nature conservation work and links with planning policy and monitoring across the sub-region - David Lowe update</u></p> <ul style="list-style-type: none"> • Local Nature Recovery Strategy (LNRS) – <ul style="list-style-type: none"> ○ Convened up of Warwickshire authorities only by the Government, doesn't include Coventry or Solihull. ○ The Local Nature Partnership includes Warwickshire, Coventry and Solihull. ○ Local Environment Improvement Plan (EIP) incorporated in the LNRS. ○ Targets not required, but LNRS includes targets. ○ Timeframe is that it will go out to consultation to Natural England on 6th May and then to the Warwickshire authorities before going out to public consultation in June. It will then go through the County Council's committee cycles before SoS gives the final decision. ○ It is in place for 5 years unless there is agreement with the SoS to update it sooner. ○ It is not in the LNRS's gift to protect sites; it only identifies opportunities. ○ Ongoing role of CSWAPO will be to provide input into identified sites in each authority area. • Natural Capital Investment Strategy • Green Infrastructure Strategy – Annex 2: Landscape Character • BNG Monitoring Report requirements resulting from the Env Act 	
4	<p><u>Minutes of last CSWAPO meeting and any matters arising</u></p> <p>Agreed.</p>	
5	<p><u>Changes to the NPPF, devolution and planning reform</u></p> <p>N/A</p>	
6	<p><u>Priority Topics</u></p> <ol style="list-style-type: none"> 1. Climate Change – WMCA doing a lot of work on this and it would be useful to hear from them. It would also be good to better understand how much planning policy can do regarding embodied carbon. 2. Employment (Local employment need and strategic) – N/A 3. Environment – N/A 4. Growth, housing and Gypsy & Traveller accommodation – N/A 5. Strategic infrastructure and transport – Chris E to discuss with transport colleagues to give an update at next meeting. 	<p>DT – to identify the person from the WMCA climate change team and to invite them to attend CSWAPO to provide an update.</p>

7	<p><u>MoU / SoCG progress</u></p> <p>CCC to send follow up letter on MoU clarifying the stated requirements and chasing up responses.</p>	
8	<p><u>Strategic monitoring and JMOG feedback</u></p> <p>N/A</p>	
9	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – Reg 19 finished and now going through responses. PINS advisory visit to take place next week. • Hinckley and Bosworth – To provide update at next meeting. • North Warwickshire – Update on timescales for Local Plan to be given at next meeting. • Nuneaton and Bedworth – Main mods finalised and going out to consultation on 6th May for 6 weeks. • Rugby – No update. • Solihull – To provide update at next meeting. • Stratford on Avon (SWLP) – No update. • Warwick (SWLP) – No update. • WCC – No update. 	
10	<p><u>AOB</u></p> <p>Chris E sent the note around from Paul Wilcox on the minerals and waste data sets, including costs of the shareable platform / sharing cost of monitoring. This to be an item on the agenda for the next meeting. It was queried on what the added value of the data sets is compared to using the minerals and waste plan.</p>	<p>All – review minerals and waste note from WCC for discussion at next meeting.</p> <p>Chris E – to clarify the added value of using the data sets compared to using the minerals and waste plan.</p>

11	<u>Dates of future meetings and the chairs</u> 14 May 2025 – Nuneaton and Bedworth 11 June 2025 – Hinckley and Bosworth 9 July 2025 – Warwick 13 August 2025 – Solihull 10 September 2025 – Stratford on Avon 8 October 2025 – Coventry 12 November 2025 – North Warwickshire 9 December 2025 – Rugby	
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Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 14th May 2025

Venue: Online via Teams

Attendees

Mike Dittman	North Warwickshire BC
Jo Bozdoganli	Stratford on Avon DC
Neil Holly	Rugby BC
Hayley Smith	Rugby BC
Claire Eggington	Coventry City Council
Daniel Taylor	Coventry City Council
Rob Back	Coventry City Council
Andrew Cornfoot	Warwick DC
Sarah Matile (chair)	Nuneaton and Bedworth BC

Minutes

AGENDA ITEMS		ACTION
1	<p><u>Introduction and apologies</u></p> <p>Apologies:</p> <p>Chris Styles – Coventry City Council Dorothy Barratt – North Warwickshire Chris Egan – Warwickshire CC Kirstie Rea – Hinckley and Bosworth</p>	
2	<p><u>Minutes of last CSWAPO meeting and any matters arising</u></p> <p>Agreed.</p>	
3	<p><u>Changes to the NPPF, devolution and planning reform</u></p> <p>N/A</p>	
4	<p><u>WCC Minerals and Waste Data Sets</u></p> <p>Chris E email dated 14.05.25, circulated by Clare E, set out the added value of using the data sets compared to using the minerals and waste plan. This followed the note from Paul Wilcox circulated last month on the mineral and waste data sets, which included costs of the shareable platform / sharing cost of monitoring.</p>	All – review minerals and waste note from WCC for discussion at next meeting.
5	<p><u>Priority Topics</u></p>	DT – to send invite to June meeting to

	<ol style="list-style-type: none"> Climate Change – DT - Laurie Duncan from the WMCA, working on net zero and the climate change strategy, is happy to speak at the June meeting. Members agreed it would be beneficial for Laurie to attend next month. Employment (Local employment need and strategic) – N/A Environment – N/A Growth, housing and Gypsy & Traveller accommodation – Dedicated meeting on this being organised by NH. South Warwickshire SHMA is being prepared and NBBC and NWBC are looking to do the same. Strategic Infrastructure and transport – Update from Chris E, via email dated 14.05.25, stating that Transport Colleagues are providing support for the SWLP proposals by developing Strategic Transport Assessments. These will consider the cumulative impacts and mitigation requirements of all sites identified as potential allocations. The mitigation package will be included in the SWLP Infrastructure Delivery Plan. To be completed by the end of the year. <p>Local Transport Plan for WCC is being produced with draft area strategies.</p> <p>An update is needed from WCC and CCC Highways teams in relation to a district and borough wide transport strategy.</p>	<p>Laurie Duncan from the WMCA net zero team.</p> <p>NH - to set up a meeting between all Warwickshire authorities and the County Council on G&TA.</p> <p>JB & Clare E - to organise for a member of the County and City Highways teams to attend and provide an update at the July meeting.</p>
6	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> Discussion was held following the CSWAPO meeting to run through the responses received on the MoU. CCC advised they had undertaking further work on potential additional employment supply in response to issues raised in the reps (opportunities for recycling of older sites) and will circulate detail asap. CCC strategy is to progress with an MoU as the overarching document and then to agree specific SoCGs to reflect each LA's more localised circumstances. SoCG template circulated. CCC to incorporate the responses into the MoU and to circulate another version. CCC advised they would like the MoU signed by the end of July to fit in with their timetable for proposed submission (subject to authority from Council). 	<p>Clare E – to circulate updated MoU and employment work information.</p>
7	<p><u>Strategic monitoring and JMOG feedback</u></p>	

	Chris E, via update email dated 14.05.25 – Feedback from the last JMOG meeting was provided at the last CSWAPO, JMOG's next meeting is on 30 th June.	
8	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – on tack to submit for examination in the summer subject to authority from Council. • Hinckley and Bosworth – to provide update at next meeting. • North Warwickshire – Local Plan Issues and Options targeted for early autumn. Employment DPD being prepared for Reg 19. • Nuneaton and Bedworth – SFRA addendum being prepared to include latest EA flood mapping. Main mods consultation now set for end of May / beginning of June. • Rugby – Preferred Options consultation finishes next week and then will be going through responses. • Solihull – to provide update at next meeting. • Stratford on Avon (SWLP) – working through consultation responses and looking to submit Reg 19 plan by December 2026 • Warwick (SWLP) – as per Stratford on Avon update. • WCC – to provide update at next meeting. 	
9	<p><u>AOB</u></p> <p>By virtue of capacity / resource issues at HBBC and as the main business of CSWAPO is the HMA and FEMA it would seem sensible to remove HBBC from needing to attend every month and instead for them to be invited specifically to any meetings of direct relevance.</p> <p>Discussion had on what to use the CSWAPO budget on, however, ahead of using the budget, it should be investigated which authorities originally paid in and for any monies to be refunded where necessary.</p>	<p>Clare E – to contact HBBC about potentially changing their attendance to meetings only where directly relevant.</p> <p>Chris E – to identify which authorities originally paid into the CSWAPO budget.</p>

10	<u>Dates of future meetings and the chairs</u> 11 June 2025 – Warwick 9 July 2025 – Solihull 13 August 2025 – Stratford on Avon 10 September 2025 – Coventry 8 October 2025 – North Warwickshire 12 November 2025 – Rugby 9 December 2025 – Nuneaton and Bedworth 14 January 2025 – Warwickshire CC	
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Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 11th June 2025

Venue: Online via Teams

Attendees

Mike Dittman	North Warwickshire BC
Jo Bozdoganli	Stratford on Avon DC
Neil Holly	Rugby BC
Clare Eggington	Coventry City Council
Daniel Taylor	Coventry City Council
Rob Back	Coventry City Council
Andrew Cornfoot (chair)	Warwick DC
Sarah Matile	Nuneaton and Bedworth BC
Chris Egan	Warwickshire CC

Minutes

AGENDA ITEMS		ACTION
1	<p><u>Introduction and apologies</u></p> <p>Apologies:</p> <p>Dorothy Barratt – North Warwickshire Hayley Smith – Rugby BC</p>	
2	<p><u>WMCA Net Zero / Climate Change Strategy update</u></p> <p>Laurie Duncan, Energy Research Analyst and Partnership Co-Ordinator at the WMCA attended and gave the following update:</p> <ul style="list-style-type: none"> • WMCA have a 2041 target and the following sectors have their own five-year targets: 1. Domestic, 2. Commercial, 3. Industrial, 4. Transport, 5. Land Use. • WMCA recent publications include: <ul style="list-style-type: none"> ◦ WM Futures Green Paper April 2025 consultation ◦ WM Regional Energy Strategy - https://www.wmca.org.uk/what-we-do/environment-energy/energy-capital/policy/regional-energy-strategy/ • First five-year plan timeframe now expired and the WMCA are working on their second five-year plan which highlights: <ul style="list-style-type: none"> ◦ Electricity will be the main driver to transition to net zero. ◦ Hydrogen less feasible now compared to first five-year plan. ◦ WM region is a large centre of energy demand and can trailblaze a smarter energy system. 	

	<ul style="list-style-type: none"> ○ 2nd five-year plan to have a more bottom up, place-based approach, moving away from targets for siloed technologies. ○ Mitigation and adaptation more at the core to ensure WM is more prepared and limits the retrofitting of houses. ○ Identifies how all WM functions help towards net zero delivery ○ Monitoring framework that draws on publicly accessible data. <ul style="list-style-type: none"> • LEAP+ tool is available to all WM region authorities by contacting gordon.telling@wmca.org.uk - LAEP Delivery Manager • In terms of what net zero means, scaling by population or land area or GVA, etc. will give different values. • WMCA looking to set a fair carbon budget and to decide whether different sectors should have different budgets and different time scales, particularly those difficult to de-carbonise sectors so they are not overly harmed. • Local vs. regional responsibility and understanding national influences that the region can't control. • Homes for the Future looks at embodied carbon, but mainly operational: https://www.wmca.org.uk/what-we-do/housing-property-regeneration/homes-for-the-future/ 										
3	<p><u>Minutes of last CSWAPO meeting and any matters arising</u></p> <p>Agreed, subject to the submission date of Reg 19 of the South Warwickshire Plan being amended to 'by December 2026' in agenda item 8 – updates from each member organisation.</p>										
4	<p><u>CSWAPO Budget</u></p> <p>Chris E confirmed that no authority has been charged with any subs since 2014/15 and that the charges prior to this were equally spread across seven authorities:</p> <table border="0"> <tr> <td>1. NBBC</td> <td>2. NWBC</td> <td>3. RBC</td> </tr> <tr> <td>4. SMBC</td> <td>5. WCC</td> <td>6. WDC</td> </tr> <tr> <td>7. CCC</td> <td></td> <td></td> </tr> </table> <p>WCC are holding [REDACTED] and it was agreed by all members that this should be fully refunded to the seven authorities, which equals [REDACTED] each and to therefore disband any financial governance.</p>	1. NBBC	2. NWBC	3. RBC	4. SMBC	5. WCC	6. WDC	7. CCC			<p>Chris E – to provide and send PO numbers to the seven authorities for them to invoice against.</p>
1. NBBC	2. NWBC	3. RBC									
4. SMBC	5. WCC	6. WDC									
7. CCC											
5	<p><u>WCC Minerals and Waste Data Sets</u></p> <p>Chris E email dated 14.05.25, circulated by Clare E, set out the added value of using the data sets compared to using the minerals and waste plan. This followed the note from Paul Wilcox circulated in April on the mineral and waste data sets, which included costs of the shareable platform / sharing cost of monitoring.</p>	<p>All – review minerals and waste note from WCC for discussion at next meeting.</p>									

	<p>Chris E confirmed that it would be a one-off payment until April 2029.</p> <p>Data sets could be relevant for DM too and therefore authorities will speak to their DM colleagues ahead of deciding.</p>	<p>Chris E – to confirm the useability i.e. would shape files be provided to load onto council's own systems or would it be a separate platform to log into.</p>
6	<p><u>Changes to the NPPF, devolution and planning reform</u></p> <p><u>Devolution / Local Government Reorganisation (LGR):</u></p> <ul style="list-style-type: none"> • Letters received by authorities from Government requiring work to continue and for their preferred single / one geography option to be agreed by the November deadline. • WCC received a response on funding being provided but it was unclear who would receive this - the County Council or the District and Borough Councils. • Latest Government update suggests the size of the new authorities will be more flexible with the 500,000-population requirement being softened. <p><u>Other planning reforms discussed:</u></p> <ul style="list-style-type: none"> • Update to the NPPF aimed for September 2025 • Infrastructure Bill aimed for November 2025. • Details for new plan making system to be out later this year. • National Model Design Codes aimed for September 2025. • Digital plan templates aimed for July 2025. • Local plan leaders' network. • Funding for IDPs. 	
7	<p><u>Priority Topics</u></p> <ol style="list-style-type: none"> 1. Climate Change – N/A 2. Employment (Local employment need and strategic) – N/A 3. Environment – N/A 4. Growth, housing and Gypsy & Traveller accommodation – Dedicated meeting on this being organised by NH. 5. Strategic Infrastructure and transport – David Pipe, Senior Transport Strategy Officer at CCC, is available to attend the July meeting to provide an update on the transport strategy. 	<p>NH - to set up a meeting between all Warwickshire authorities and the County Council on G&TA.</p> <p>Chris E - to organise for a member of the County</p>

		Highways team to attend and provide an update at the July meeting.
8	<p><u>Strategic monitoring and JMOG feedback</u></p> <p>JMOG's next meeting is on 30th June.</p>	
9	<p><u>Updates from each member organisation</u></p> <ul style="list-style-type: none"> • Coventry – On track to submit for examination late summer. • North Warwickshire – Local Plan Issues and Options targeted for early autumn. Employment DPD being prepared for Reg 19 and to be taken to 1st July Council meeting. • Nuneaton and Bedworth – out to consultation on main mods and climate change strategy. Initial stages of new local plan being progressed with Green Belt consultants appointed and the Green Belt methodology will soon be sent around for comments. • Rugby – Currently going through representation received from Preferred Options consultation. • Solihull – to provide update at next meeting. • Stratford on Avon (SWLP) – No further update since last month's meeting - Council working through consultation responses and looking to submit Reg 19 plan by December 2026. • Warwick (SWLP) – Nothing further to add to SADC's update. • WCC – New administration and portfolio holders. 	
10	<p><u>AOB</u></p> <p>HBBC agreed for their attendance to be on an invite basis. Therefore going forward, HBBC will be removed from needing to attend every month and will be invited to meetings which are of direct relevance.</p> <p>New engagement needed with Solihull MBC following Maurice leaving.</p>	<p>Clare E – to contact Solihull MBC regarding who will now attend CSWAPO for them.</p>
11	<p><u>Dates of future meetings and the chairs</u></p> <p>9 July 2025 – Stratford on Avon</p> <p>13 August 2025 – Coventry</p>	

	10 September 2025 – North Warwickshire 8 October 2025 – Rugby 12 November 2025 – Nuneaton and Bedworth 9 December 2025 – Warwickshire CC 14 January 2025 – Warwick 11 February 2025 – Solihull	
12	<p><u>MoU / SoCG progress</u></p> <ul style="list-style-type: none"> • Discussion was held following the CSWAP0 meeting to run through the latest responses received on the MoU. • Authorities confirmed their sign off processes and timescales. • CCC to incorporate the responses into the MoU and to circulate a 'final' PDF and Word version for authorities to take to their respective sign off officers / meetings. 	<p>Clare E – to circulate updated MoU.</p>

Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO)

Date: 09th July 2025

Venue: Online via Teams

Attendees

Mike Dittman	North Warwickshire BC
Jo Bozdoganli (chair)	Stratford on Avon DC
Hayley Smith	Rugby BC
Daniel Taylor	Coventry City Council
Chris Styles	Coventry City Council
Andrew Cornfoot	Warwick DC
Sarah Matile	Nuneaton and Bedworth BC

Minutes

AGENDA ITEMS		ACTION
1	<p><u>Introduction and apologies</u></p> <p>Apologies: Chris Egan – Warwickshire CC Clare Eggington – Coventry City Council</p>	
2	<p><u>Coventry Highways Transport Strategy and Modelling Update from David Pipe</u></p> <ul style="list-style-type: none"> • Transport Strategy is a 15-year strategy adopted in 2022 to improve walking, cycling and public transport. • Projects include delivering an all-electric bus fleet by the end of 2025; Very Light Rail (VLR); new segregated cycle ways; and school and liveable streets. • The Local Plan evidence base is based on modelling carried out using the Coventry Area Strategic Model (CASM) – a strategic transport model used to forecast the likely impact of any changes that are made to land use patterns (such as population growth) and to transport infrastructure in the future. • CCC is currently re-running the CASM modelling into its new modelling platform – the Coventry Strategic Modelling Tool (CSMT), which is updated with new data and additional functionality around modelling public transport (for VLR). The result of this will be released in Autumn 2025. • The modelling considers current and planned development sites in Coventry and in neighbouring authority areas. • Request for sharing indicative routes for VLR to be taken back to CCC's VLR team. 	

3	<p><u>Minutes of last CSWAPO meeting and any matters arising</u></p> <p>Agreed.</p> <p>DT – Chris E confirmed that he has asked his finance team to raise a PO number for the budget reimbursements for the seven authorities to invoice against, which once received, he will let the group know.</p>	<p>DT – to follow up with Chris E on the PO number for the budget refund.</p>
4	<p><u>WCC Minerals and Waste Data Sets</u></p> <p>Further information provided from Chris E as follows:</p> <ul style="list-style-type: none"> • The data can be provided (GIS data) in a variety of formats, and ESRI .SHP is a very common one • If another format is preferred (e.g. GeoJSON, .TAB) then sending the data like that will be established on a case-by-case basis. • Also, the data provided can be clipped to "just beyond" each District/Borough boundary - we can also agree a buffer distance, the thinking currently is 1km. • It would be a one-off payment until April 2029. <p>This further information follows:</p> <ul style="list-style-type: none"> • Email from Chris E dated 14.05.25, setting out the added value of using the data sets compared to using the minerals and waste plan • Email from Chris E dated 11.03.25, with the note from Paul Wilcox, which included the costs of the shareable platform and monitoring. 	<p>All – review minerals and waste info from WCC and to come to a decision.</p> <p>All - speak to DM colleagues ahead of deciding in case it is also relevant for them.</p>
5	<p><u>Changes to the NPPF, devolution and planning reform</u></p> <p>SADC - Planning Inquiry taking place this week focusing on 5YHLS and considered against the new standard method, which produces a higher housing figure than the Council's Core Strategy.</p> <p>Government consultation on improving the implementation of biodiversity net gain for minor, medium and brownfield development is currently ongoing until 24th July 2025.</p> <p>Government technical consultation on implementing measures to improve build out transparency ended on 7th July 2025.</p> <p>The Planning and Infrastructure Bill establishes two new tools and a centralised fund for developers to address environmental obligations:</p> <ol style="list-style-type: none"> 1. Environmental Delivery Plans (EDP); and 2. A Nature Restoration Levy (NRL). <p>An EDP will be prepared by Natural England and will relate to specific types of development in specific areas in England. It will set out the conservation measures and the cost of these measure, which will be required to mitigate the environmental impacts. Where an EDP is in place developers can pay the NRL, which Natural England</p>	

	will use to implement the necessary measures and will mean certain environmental obligations can be discharged.	
6	<u>Priority Topics</u> <ol style="list-style-type: none"> 1. Climate Change – N/A 2. Employment (Local employment need and strategic) – N/A 3. Environment – N/A 4. Growth, housing and Gypsy & Traveller accommodation – Dedicated meeting on this being organised by NH. 5. Strategic Infrastructure and transport – N/A. 	<p>NH - to set up a meeting between all Warwickshire authorities and WCC on G&TA.</p> <p>Chris E - to organise for County Highways to attend CSWAPO and provide an update.</p>
7	<u>MoU / SoCG progress</u> <ul style="list-style-type: none"> • Responses on the MoU received from RBC, NBBC and NWBC. • WDC / SADC – going to portfolio holder at the end of next week and then requires both WDC and SADC Leaders' sign off. • CCC to follow up with WCC. • Work on how CCC have tried to address their employment shortfall will be crucial. • SoCG to be agreed with authorities once all responses are received on the MoU. • RBC have sent letters to all authorities regarding their G&TA shortfall. 	
8	<u>Strategic monitoring and JMOG feedback</u> <ul style="list-style-type: none"> • JMOG actions from 30th June meeting issued by Chris E. • HMA position statement may be required to show how collectively authorities are meeting the requirement. 	DT – to follow up the Chris E on potential HMA position statement.
9	<u>Updates from each member organisation</u> <ul style="list-style-type: none"> • Coventry – on track to submit for examination in September. • North Warwickshire – to provide update at next meeting. • Nuneaton and Bedworth – out to consultation on main mods, which closes on Monday. 	

	<ul style="list-style-type: none"> • Rugby – currently going through representation received from Preferred Options consultation. Work ongoing for Reg 19 consultation in 2026. • Solihull – to provide update at next meeting. • Stratford on Avon (SWLP) – Council working through consultation responses and looking to submit Reg 19 plan by December 2026. Corporate agreement to use AI for reviewing public representations received. • Warwick (SWLP) – nothing further to add to SADC's update. • WCC – to provide update at next meeting. 	
10	<p><u>AOB</u></p> <p>New engagement needed with Solihull MBC following Maurice leaving.</p> <p>National Climate Action Scorecards - these show the performance of councils in respect of their actions towards tackling climate change. WDC picked out as being the 10th highest and 1st in the West Midlands, scoring highest (out of the different categories) in 'Planning & Land Use', which is in large part as a result of the Net Zero Carbon DPD, and associated SPD.</p>	<p>Clare E – to chase up contact at Solihull MBC regarding attendance at CSWAPO.</p>
11	<p><u>Dates of future meetings and the chairs</u></p> <p>13 August 2025 – Coventry</p> <p>10 September 2025 – North Warwickshire</p> <p>8 October 2025 – Rugby</p> <p>12 November 2025 – Nuneaton and Bedworth</p> <p>9 December 2025 – Warwickshire CC</p> <p>14 January 2026 – Warwick</p> <p>11 February 2026 – Solihull</p> <p>11 March 2026 – Stratford on Avon</p>	

Appendix 3 Duty to Cooperate subgroup notes and correspondence

DtC HEDNA Discussion

Date: 12th June 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

<u>Chris Kingham</u>	<u>Nuneaton and Bedworth BC</u>
<u>Jacqui Padbury</u>	<u>Nuneaton and Bedworth BC</u>
<u>Neil Glover</u>	<u>Nuneaton and Bedworth BC</u>
<u>Sarah Matile</u>	<u>Nuneaton and Bedworth BC</u>
<u>Jade Bagley</u>	<u>Nuneaton and Bedworth BC</u>
<u>Hayley Smith</u>	<u>Rugby BC</u>
<u>Daniel Taylor</u>	<u>Coventry City Council</u>
<u>Clare Eggington (Chair)</u>	<u>Coventry City Council</u>
<u>Rob Back</u>	<u>Coventry City Council</u>
<u>Chris Styles</u>	<u>Coventry City Council</u>
<u>Scott Green</u>	<u>Coventry City Council</u>
<u>John Careford</u>	<u>Stratford on Avon DC</u>
<u>Andrew Cornfoot</u>	<u>Warwick DC</u>

Housing

- CCC position is to stick to published reg 18 position of the HEDNA as the need in Coventry. A statement to be produced to show updated evidence considered but data post 2021 census is volatile and doesn't provide the certainty needed to provide a reliable basis for plan making.
- HEDNA figures to be used as the base figure, which are a minimum. Annual affordability ratios were discussed but as these vary year on year a stable baseline is needed and the HEDNA provides that.

- CCC figures are, minus the 35% uplift, an annual need of 1,455, which equates to 29,100 over the plan period. Supply figure is circa 30,600, therefore no unmet housing need to distribute. This accounts for work done to densify the city centre and around the city centre and includes windfall sites. It does not include Green Belt. Detailed work now needed on the delivery of sites and whether a buffer is needed.
- NBBC include a buffer but are being examined under Sept 2023 version of NPPF.
- Need for a sub-regional agreement on what the housing figures are – via MoU or SoCG. Also potential to agree a sub-regional position on calculation of land supply.
- The view of the group was that an MoU is overarching and a SoCG would be between individual authorities on individual matters – particularly relating to Reg 19 reps.
- NBBC preference at this stage is for MoU with factual note to be sent for agreement.

Housing Actions

- CCC to circulate an update on MoU.
- CCC to go back to Iceni on update report.

Employment

- CCC has a high requirement, but significant shortfall on employment land. Supply is approx. 48.25ha although work still underway at present. HEDNA need to 2041 is 156.1ha (see table 11.2 on page 236 of HEDNA).
- Nothing identified in CCC boundary is classified as strategic employment land ie >25ha.
- Discussion agreed that finalised supply figures should account for the recycling of employment sites and the findings in the ELR (CCC confirmed this evidence is almost complete).

Employment Actions

- CCC to circulate a table showing CCC figures, which the other LPAs will use to insert their figures to understand sub-regional supply.

DtC Coventry housing, employment and MoU Discussion

Date: 5th September 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Rob Back (Chair)	Coventry City Council
Chris Styles	Coventry City Council
Clare Eggington	Coventry City Council
Sarah Matile	Nuneaton and Bedworth BC
Jade Bagley	Nuneaton and Bedworth BC
Neil Holly	Rugby BC
Hayley Smith	Rugby BC
Dorothy Barratt	North Warwickshire BC
Mike Dittman	North Warwickshire BC
Joanne Bozdoganli	Stratford on Avon DC
Andrew Cornfoot	Warwick DC

Notes of last meeting

Agreed

Local Authority Local Plans update

- CCC in line with the LDS, aiming for Cabinet early November, anticipating 8 week Reg 19 consultation as likely to be run over the Christmas period. Aiming to submit asap under the transitional arrangements, and using the HEDNA as the basis for housing and employment numbers.
- SoA working with WDC on the SWLP, preferred options aiming for November / December cabinet, consult early 2025. HEDNA figures signed off so proceeding on the basis of the HEDNA figures but also bearing the future standard method figures in mind (this would result in an uplift from the HEDNA of around 500dpa across the SWLP area). Employment evidence has been signed off. Hoping to submit plan summer 2026.
- RBC aiming to undertake preferred options in March 2025 and June / July 2025 to submit. Working on the basis of the new SM figures. In terms of employment will be using the HEDNA, WMSESS and the alignment note – strong evidence for meeting the DtC, and a consistent approach. Currently considering any updates needed for evidence and likely to extend the plan period to 2045 (or possibly 2050).
- WDC as per SoA regarding the SWLP. Exercising caution until the new SM figures are confirmed given they are currently the subject of consultation. Considering timings and impacts of elections next May as will also affect plan timetabling (this led to a wider discussion on this issue)
- NBBC plan is in examination, first set of hearings held in July, block 2 starts 24th September. Have extended call for employment sites to 16th September.
- NWBC not currently undertaking a Local Plan review, presently progressing the employment DPD aiming to undertake Regulation 19 early 2025. Facing a lot of pressure in regard to employment, and significant interest in current call

for sites. Iceni commissioned to undertake detailed work on employment sites. Currently mindful of government changes so considering implications for the plan. Have concerns about the impacts of the new SM, and unlikely to be able to help with anyone else's shortfall as this is not being supported by the necessary investment in infrastructure.

Housing

- CCC commissioned update report from Iceni which concludes that for Coventry HEDNA remains a sound basis for preparing a Local Plan. Discussion on differing Local Plan timetables meaning that some will be going forward using the new SM figures – for Coventry the local HEDNA figure (which excludes the cities uplift) is similar to the HEDNA but this is not the case for other areas. CCC anticipate being able to accommodate this through a strategy of brownfield first, and densification. Will need to continue to review and keep each other updated and continue to work collaboratively.

Employment

- Alignment paper – comments had been sent to Iceni and revised version due this week, generally partners happy with this CCC had sought clarification on how some of the figures had been worked out based on the data provided and awaiting confirmation on the residual need figure.
- CCC work still underway. Green Belt site has been submitted approx. 11ha north of A45 but is on area of high scoring Green Belt (Green Belt review technical update forms part of the evidence base). Call for employment sites currently live (closes 20th September). Anticipate a shortfall but extent tbc pending alignment report.

ACTION: CCC to provide update once supply and shortfall confirmed

Memorandum of Understanding

- An initial draft had been circulated with the meeting papers. Updated draft to be circulated for comment: feedback requested by 30th September, and then discussed at a meeting which was agreed should be on Thursday 17th October 11.30 am.

ACTION:

- CCC to circulate revised MoU
- Comments on MoU to be sent to Clare Eggington and Chris Styles by 30th September
- Meeting to discuss MoU Thursday 17th October 11.30 am.

DtC Coventry MoU Discussion

Date: 17th October 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Chris Styles (Chair)	Coventry City Council (CCC)
Clare Eggington	Coventry City Council
Jade Bagley	Nuneaton and Bedworth BC (NBBC)
Hayley Smith	Rugby BC (RBC)
Joanne Bozdoganli	Stratford on Avon DC (SDC)
Andrew Cornfoot	Warwick DC (WDC)

Apologies: Mike Dittman (NWBC), Sarah Matile, Jacqui Padbury & Maria Bailey (NBBC).

Context

The draft MoU had been amended after further discussion at the meeting of 5th September. Comments had been requested by 30th September and had been received from NBBC and WDC. The focus of this meeting had been agreed to be the MoU.

CCC Timescales

These had slipped slightly, anticipating Cabinet on 10th December 2024 and Council 14th January 2025, with a six week Reg 19 consultation proceeding asap afterwards. Intention remains to progress under the December 2023 NPPF, as part of the Transitional Arrangements.

It was noted that the SWLP is aiming to undertake a Reg 18 consultation (8 weeks) at the start of the new year.

Feedback on the MoU

Amendments to include:

- Map
- Reference to the fact that NWBC and SDC also fall within the Greater Birmingham HMA

Employment

Strategic need

There was a discussion regarding how to address Strategic B8 and whether a joint DPD is an appropriate mechanism or if it should be dealt with in a different way. Coventry falls within Area of Search 7 (WMSESS) but apart from the 25ha site at Baginton (already allocated through the adopted Local Plan) no other sites had come forward which would meet the thresholds so partnership working would be important to progress and initial discussions had already begun with parties in that area of search.

Local need

Coventry advised that it was facing a Local Need shortfall as set out in the Alignment Paper. An additional Call for Employment Sites had been held with no further new submissions and that following assessment work of all sites and a technical update to the Green Belt review, a site (11ha developable area) would not be put forward due to the impact upon a remaining important part of the City's Green Belt. Notwithstanding this, further work had been undertaken through an Employment Land Review to identify existing key employment sites to ensure that they were better protected.

Actions

In terms of actions it was agreed that:

- **A revised version of the MoU would be circulated taking account of the amendments requested**
- **Once received officers were to discuss internally, making clear that the MoU would be iterative with the intention of updating to reflect progress on local plans and to reflect changes to the NPPF**
- **Statements of Common Ground would also be needed and Coventry would be preparing these and discussing with DtC partners shortly once the Regulation 19 papers are public**
- **Employment matters to be discussed at CSWAPO**
- **Next meeting agreed to be pm 26th November 2024 CCC to send invitation**

DtC Coventry MoU Discussion

Date: 26th November 2024

Venue: Meeting conducted virtually using Microsoft Teams

Attendees:

Chris Styles (Chair)	Coventry City Council (CCC)
Clare Eggington	Coventry City Council (CCC)
Jacqui Padbury	Nuneaton and Bedworth BC (NBBC)
Jade Bagley	Nuneaton and Bedworth BC (NBBC)
Neil Holly	Rugby BC (RBC)
Hayley Smith	Rugby BC (RBC)
Joanne Bozdoganli	Stratford on Avon DC (SDC)
Andrew Cornfoot	Warwick DC (WDC)
Mike Dittman	North Warwickshire Borough Council (NWBC)
Chris Egan	Warwickshire County Council (WCC)

Apologies: Sarah Matile (NBBC)

Context

The draft MoU had been amended after further discussion at the meeting of 17th October 2024. No additional comments had been received in addition to those from NBBC and WDC. A track changes and clean version had been circulated for further feedback, taking into account comments received to date. A map is to be added (not included on the circulated version).

Feedback on the MoU

The discussion centred on the awaited revised NPPF which is anticipated by the end of the year. It was felt that the MoU needed to include the position of the other HMA authorities and that this would be able to be clarified once the Government changes were published.

The topic of the MoU being iterative was discussed and all parties agreed that at this point it would be more efficient to take a single MoU through the various governance processes in the first quarter of the new year rather than having to keep updating it,

as this would need to be done in any case once the revised NPPF outcomes were known.

It was agreed that any further updates to the MoU would be discussed straight after the next CSWAPo meeting on 8th January 2025.

Actions

In terms of actions it was agreed that:

- **The next meeting of the MoU partners would be held straight after CSWAPo on 8th January.**
- **This meeting will include updates needed to the MoU once NPPF changes are known, and discussion on how to address the employment shortfall.**

Action carried forward from the previous meeting

- **Statements of Common Ground would also be needed and Coventry would be preparing these and discussing with DtC partners shortly once the Regulation 19 papers are public**



FAO Maria Bailey
Strategic Director – Housing and Community
Nuneaton and Bedworth Borough Council

City Services

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Coventry City Council
PO Box 7097
COVENTRY
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coventry.gov.uk

Email: Rob.Back@coventry.gov.uk

Our reference : DtCEmp

Date: 13 February 2025

re: Coventry Local Plan Review and Employment Land shortfall

Dear Maria

Coventry City Council is currently consulting on the Regulation 19 stage of the Local Plan review. As you will be aware, under the Statutory Duty to Co-operate, officers have been working together on a shared evidence base to inform plan making.

We are pleased to be able to advise that, for this round of plan-making we believe we can accommodate our housing growth needs, as can be seen from the documentation we have published. However, the evidence base for employment provides a Local Employment Need figure of 105 hectares for Coventry, and we are only able to identify a supply of 60 hectares, therefore leaving a shortfall of 45 hectares.

The City Council has undertaken several Call for Sites exercises in seeking to address this shortfall, including a targeted Call for Employment Sites in summer 2024. Additionally, as part of the Local Plan Review process, we have also carried out an Employment Land review and have developed policies aimed at protecting our existing employment sites.

However, through these processes the authority has only received one new submission, this being of an 11 hectare proposal to the east of Coventry which, further to assessment, has been discounted as the nominated site lies within a significant area of Green Belt, within the historic Arden landscape, and is also high-quality agricultural land.

In terms of strategic employment sites (those of 25 hectares and over) we also wish you to be aware that similarly we have received no new sites which being promoted for this purpose within our administrative area.

The situation has been discussed at officer level through our regular Duty to Co-operate meetings, in the context of our formal launch of the Regulation 19 stage of plan making, the City Council is now formally requesting the assistance of neighbouring authorities in meeting this need, as partner authorities within the defined Functional Economic Market Area (FEMA), through the development of your own Local Plans

CS-WHOLE-WHOLESTART

We would be grateful for your consideration of this matter and look forward to your response. We would appreciate feedback within a month of the date of this letter and of course would welcome further discussion.

Yours sincerely,



Rob Back
Strategic Lead: Planning
Coventry City Council

Enquiries to: Louise Hryniw

Direct Dial: (024) 7637 6310

Direct Email: louise.hryniw@nuneatonandbedworth.gov.uk

Date: 27.02.2025

Your Ref: DtCEmp

Coventry City Council
PO Box 7097
Coventry
BCV6 9SL

FAO: Rob Back, Strategic Lead: Planning

NBBC Response to Coventry Local Plan Review and Employment Land Shortfall

Thank you for your letter dated 13 February 2025. Nuneaton and Bedworth Borough Council (NBBC) has worked with Coventry City Council (CCC) on a range of cross boundary strategic matters in accordance with the Duty to Cooperate. CCC are currently consulting on the Regulation 19 Local Plan review which NBBC has recently submitted representations in response to.

We note and are supportive of the approach that CCC is able to meet its housing need within its administrative boundary. As you will be aware the NBBC Borough Plan Review (BPR) is at an advanced stage of preparation, with the Regulation 19 Examination in Public hearings undertaken in July to October 2024. The NBBC BPR establishes a housing requirement above the minimum need to provide for economic growth, regeneration of the town centres, and headroom for unmet need within the HMA. NBBC will continue to work with CCC on this matter as respective Local Plans progress.

It is understood that the CCC Local Plan results in a shortfall of 45 ha employment land against a need of 105 ha. NBBC has recently undertaken a 'Call for Employment Sites' exercise, with the results about to be published. Of the sites submitted two non-Green Belt sites were received both of which pose potential deliverability issues. The remainder were located in the Green Belt. Therefore, the NBBC Call for Sites exercise establishes that there is no suitable employment land in the Borough which matches the CCC preferred approach to allocate non-Green Belt sites.

NBBC believes the shortfall occurs, in part, due to CCC preferred approach to protect Green Belt sites and promote brownfield sites. As set out in our Regulation 19 representations, there are steps CCC could take to ensure the shortfall is met within the administrative boundaries.

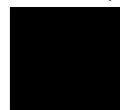
The 11 ha site mentioned in your letter has been discarded as it located in the Green Belt and agricultural land classification. NBBC notes that a significant highway infrastructure project has been permissioned and built within the site boundary project which allows access from the A45. We consider there should be an assessment regarding the openness of the Green Belt in this area to establish if the Green Belt has been comprised by the development. There are also economic and sustainability benefits to allocating land in proximity to the strategic highway network which should also be considered. NBBC notes that the Agricultural Classification for the site is the same as for the traffic island and nearby Sustainable Urban Extension.

We are supportive of the approach to promote brownfield sites but believe CCC has excluded a provision from recycling of sites. As outlined in our representation, the HEDNA is based on gross completions and assumes some of the need is generated in this way. It is logical that some of the supply will be met in the same way over the plan period.

We consider that investigating these issues will go some way towards CCC being able to meet more of its need within its administrative boundaries.

We look forward to continuing to work with you as we both progress our Local Plans.

Yours sincerely



Louise Hryniw
Assistant Director – Planning



FAO Dorothy Barratt
Forward Planning and Economic Strategy
Manager
North Warwickshire Borough Council

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Email: Rob.Back@coventry.gov.uk

Our reference : DtCEmp

Date: 13 February 2025

re: Coventry Local Plan Review and Employment Land shortfall

Dear Dorothy

Coventry City Council is currently consulting on the Regulation 19 stage of the Local Plan review. As you will be aware, under the Statutory Duty to Co-operate, officers have been working together on a shared evidence base to inform plan making.

We are pleased to be able to advise that, for this round of plan-making we believe we can accommodate our housing growth needs, as can be seen from the documentation we have published. However, the evidence base for employment provides a Local Employment Need figure of 105 hectares for Coventry, and we are only able to identify a supply of 60 hectares, therefore leaving a shortfall of 45 hectares.

The City Council has undertaken several Call for Sites exercises in seeking to address this shortfall, including a targeted Call for Employment Sites in summer 2024. Additionally, as part of the Local Plan Review process, we have also carried out an Employment Land review and have developed policies aimed at protecting our existing employment sites.

However, through these processes the authority has only received one new submission, this being of an 11 hectare proposal to the east of Coventry which, further to assessment, has been discounted as the nominated site lies within a significant area of Green Belt, within the historic Arden landscape, and is also high-quality agricultural land.

In terms of strategic employment sites (those of 25 hectares and over) we also wish you to be aware that similarly we have received no new sites which being promoted for this purpose within our administrative area.

The situation has been discussed at officer level through our regular Duty to Co-operate meetings, in the context of our formal launch of the Regulation 19 stage of plan making, the City Council is now formally requesting the assistance of neighbouring authorities in meeting this need, as partner authorities within the defined Functional Economic Market Area (FEMA), through the development of your own Local Plans

CS-WHOLE-WHOLESTART

We would be grateful for your consideration of this matter and look forward to your response. We would appreciate feedback within a month of the date of this letter and of course would welcome further discussion.

Yours sincerely,



Rob Back
Strategic Lead: Planning
Coventry City Council



FAO Nicola Smith
Chief Officer Growth and Investments
Rugby Borough Council

City Services

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Our reference : DtCEmp

Date: 13 February 2025

re: Coventry Local Plan Review and Employment Land shortfall

Dear Nicola

Coventry City Council is currently consulting on the Regulation 19 stage of the Local Plan review. As you will be aware, under the Statutory Duty to Co-operate, officers have been working together on a shared evidence base to inform plan making.

We are pleased to be able to advise that, for this round of plan-making we believe we can accommodate our housing growth needs, as can be seen from the documentation we have published. However, the evidence base for employment provides a Local Employment Need figure of 105 hectares for Coventry, and we are only able to identify a supply of 60 hectares, therefore leaving a shortfall of 45 hectares.

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CS-WHOLE-WHOLESTART

We would be grateful for your consideration of this matter and look forward to your response. We would appreciate feedback within a month of the date of this letter and of course would welcome further discussion.

Yours sincerely,



Rob Back
Strategic Lead: Planning
Coventry City Council



*FAO John Careford
Head of Development
Stratford-on-Avon District Council*

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Our reference : DtCEmp

Date: 13 February 2025

re: Coventry Local Plan Review and Employment Land shortfall

Dear John

Coventry City Council is currently consulting on the Regulation 19 stage of the Local Plan review. As you will be aware, under the Statutory Duty to Co-operate, officers have been working together on a shared evidence base to inform plan making.

We are pleased to be able to advise that, for this round of plan-making we believe we can accommodate our housing growth needs, as can be seen from the documentation we have published. However, the evidence base for employment provides a Local Employment Need figure of 105 hectares for Coventry, and we are only able to identify a supply of 60 hectares, therefore leaving a shortfall of 45 hectares.

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CS-WHOLE-WHOLESTART

We would be grateful for your consideration of this matter and look forward to your response. We would appreciate feedback within a month of the date of this letter and of course would welcome further discussion.

Yours sincerely,



Rob Back
Strategic Lead: Planning
Coventry City Council



*FAO Phil Clarke
Head of Place, Arts and Economy
Warwick District Council*

City Services

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Our reference : DtCEmp

Date: 13 February 2025

re: Coventry Local Plan Review and Employment Land shortfall

Dear Phil

Coventry City Council is currently consulting on the Regulation 19 stage of the Local Plan review. As you will be aware, under the Statutory Duty to Co-operate, officers have been working together on a shared evidence base to inform plan making.

We are pleased to be able to advise that, for this round of plan-making we believe we can accommodate our housing growth needs, as can be seen from the documentation we have published. However, the evidence base for employment provides a Local Employment Need figure of 105 hectares for Coventry, and we are only able to identify a supply of 60 hectares, therefore leaving a shortfall of 45 hectares.

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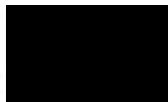
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CS-WHOLE-WHOLESTART

We would be grateful for your consideration of this matter and look forward to your response. We would appreciate feedback within a month of the date of this letter and of course would welcome further discussion.

Yours sincerely,



Rob Back
Strategic Lead: Planning
Coventry City Council

Dear Rob,

In reply to your letter of 13th February regarding the Coventry Local Plan Review and Employment Land shortfall, I am happy to confirm that Warwick District Council is happy to assist by working collaboratively with Coventry City Council and all other neighbouring councils. This will be to understand the extent of this shortfall and subsequently ensure that the employment needs of the Functional Economic Market Area (FEMA) are met through the development of our Local Plans.

I am aware that your Local Plan has concluded that all Green Belt land should remain protected and not allocated for development. In the recent representation to your plan submitted jointly by both Warwick and Stratford District Councils, we asked that the City Council undertake a full assessment of these Green Belt sites for their potential suitability as employment sites. We consider that 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. We would welcome the opportunity to discuss this with you as part of the ongoing discussions on how to meet the shortfall of employment land.

Kind regards,

Phil

PS. If you would like to receive a copy of this in letter format for your records, please ask.

Philip Clarke
Head of Place, Arts & Economy

Appendix 4 Memorandum of Understanding (MoU) and related documentation

1. INTRODUCTION

- This Memorandum of Understanding (MoU) has been prepared in accordance with national guidance¹⁰ and is intended to cover matters of strategic importance relevant to all authorities, specifically relating to housing and employment needs across the Housing Market Area (HMA) and Functional Economic Market Area (FEMA).
- The intention is that once discussed and supported, through amendments if required, this MoU will be agreed by the following Councils:

Coventry City Council
North Warwickshire Borough Council
Nuneaton & Bedworth Borough Council
Rugby Borough Council
Stratford-on-Avon District Council
Warwick District Council
Warwickshire County Council

2. GEOGRAPHY COVERED BY MEMORANDUM OF UNDERSTANDING

- This MoU covers the Local Planning Authorities within the Coventry and Warwickshire HMA/FEMA (C&W HMA). The C&W HMA/FEMA is made up of Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council, Warwick District Council and Warwickshire County Council. It is also acknowledged.

3. PURPOSE

- There is a legal requirement for effective cooperation relating to strategic matters that cross administrative boundaries to be dealt with and evidenced by Statements of Common Ground.
- This Memorandum of Understanding seeks to ensure that as the Local Planning Authorities develop their Local Plans, at differing paces, the housing and employment needs of the C&W HMA/FEMA are met. It is framed within the duty to cooperate set out in Section 33A of the Planning and Compulsory Purchase Act

¹⁰ Planning Practice Guidance Paragraph 011 Reference ID: 61-011-20190315

2004 and in the context of the National Planning Policy Framework (2023 & 2024). This sets out the duty for local planning authorities and county councils to co-operate in maximising the effectiveness of the preparation of development plan documents so far as relating to strategic matters which affect more than one local authority area. As many of the local planning authorities in the Coventry and Warwickshire area are only in the early stages of reviewing their adopted plans (and acknowledging that not all have commenced such reviews, nor are required to at this stage), the situation is evolving in identifying levels of supply for housing and employment needs within authority boundaries. Through capacity assessment and a strategy of promoting best use of development land it is understood that Coventry anticipates being able to meet its own local housing needs as identified in the HEDNA – Table 1.

- The Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (November 2024) establishes that Coventry has 105 Ha of local employment need to 2041, a supply of 60ha and a residual need of 45Ha (Table 3). In regard to strategic need, Appendix 1 of the Alignment Report sets out details of committed sites across the FEMA. Discussions with partners as to how to address residual local and strategic employment needs across the FEMA are underway, therefore the MoU is iterative and will be updated as discussions progress.
- This Memorandum of Understanding commits Coventry City Council and the five Borough/District Councils within Warwickshire to an ongoing collaborative process to address the housing and economic development needs of the market area and to maintain realistic assumptions about the availability, suitability and viability of land to meet that need. In addition, given the importance of Warwickshire County Council's role and responsibilities within the area they are a signatory to this MoU.

4. POINTS OF AGREEMENT

- It is agreed that for plan making purposes there is a housing market area and functional economic market area comprising Coventry and the whole of Warwickshire. In addition, North Warwickshire Borough Council and Stratford-on-Avon District Council fall within the Greater Birmingham and Black Country Housing Market Area and therefore have a functional relationship with that area.
- The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA), produced by independent consultants ICENI Projects on behalf of the Coventry and Warwickshire local authorities, sets out an objective assessment of housing need and employment need for the Coventry and Warwickshire area. The figures below are taken directly from the HEDNA and do not include the 35% 'cities uplift' for Coventry (see para.4.6.3)

Table 1: Local Housing Need (dwellings per annum) Trend-based - HEDNA

Authority	HEDNA Housing Need (dpa)
Coventry	1455
North Warwickshire	119
Nuneaton and Bedworth ¹¹	409
Rugby	735
Stratford-on-Avon	868
Warwick	811
Total	4397

Source: Table 5.33 HEDNA 2022

- It is agreed that the 2022 HEDNA, utilising 2021 Census Data, forms the most robust evidence base of establishing the housing and employment needs of the HMA/FEMA for plans being prepared by Coventry City Council and Nuneaton and Bedworth Borough Council, under the December 2023 NPPF.
- It is agreed that for plans being prepared under the December 2024 NPPF, the HEDNA Housing Needs are superseded by the December 2024 NPPF Standard Method outcomes of Local Housing Need, as shown in Table 2 below.

Table 2: December 2024 National Planning Policy Framework - Local Housing Need

Authority	2024 NPPF Indicative Local Housing Need (dpa)
Coventry	1388
North Warwickshire	364
Nuneaton and Bedworth ¹²	737
Rugby	618
Stratford-on-Avon	1126
Warwick	1062
Total	5295

Source: NPPF Standard Method December 2024

¹¹ Nuneaton and Bedworth Borough Council commissioned a bespoke report 'Towards a Housing Requirement for Nuneaton' to be read alongside the HEDNA which provides more specific consideration of housing and employment need in Nuneaton and Bedworth Borough taking into account relevant local considerations. This identifies a housing requirement of 545 dwellings per annum for Nuneaton and Bedworth Borough.

¹² See Footnote 2 regarding the figure for NBBC.

- It is agreed that the West Midlands Strategic Employment Sites Study (WMSESS) 2023/2024 further informs the strategic employment needs of the HMA/FEMA, and that the Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (2024) accurately updates the HEDNA employment evidence and presents the current levels of employment need and supply across the HMA/FEMA.

Table 3: Local Industrial Residual Need 2021-41 (Ha) – Iceni HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	58	5	53
North Warwickshire	60	34	26
Nuneaton and Bedworth ¹³	41	52 ¹⁴	-11
Coventry	105	60	45
Stratford	144	56	88
Warwick	83	37	46
Total	492	244	248

NB: figures may not sum due to rounding

Table 4: Local Industrial Residual Need 2021-45 (Ha) – Iceni HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	68	5	63
North Warwickshire	70	34	36
Nuneaton and Bedworth	48	52	-4
Coventry	122	60	62
Stratford	167	56	111
Warwick	97	37	60
Total	572	244	328

¹³ Nuneaton and Bedworth Borough Council commissioned a bespoke report 'Towards a Housing Requirement for Nuneaton' and to be read alongside the HEDNA and 'Review of Nuneaton & Bedworth Employment Land Portfolio'. These documents identify a local industrial and warehouse employment need figure for Nuneaton and Bedworth of 66.45 ha.

¹⁴ Figure only includes allocated sites.

Table 5: Local Industrial Residual Need 2021-50 (Ha) – Iceni
HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	80	5	75
North Warwickshire	82	34	48
Nuneaton and Bedworth	56	52	4
Coventry	143	60	83
Stratford	196	56	140
Warwick	113	37	76
Total	670	244	426

- Each Council will cooperate in the delivery of the local housing and employment need which ensures that the overall needs across the housing market area will be met. To achieve this objective, it is agreed that:
 - At the time of signing this agreement it is considered that the HEDNA and WMSESS Alignment paper constitutes robust evidence for future plan-making for both housing and employment land for Coventry and Warwickshire (noting the provisions for calculating housing need as set out in paragraph 4.3 and 4.4).
 - The local authorities consider that the exceptional circumstances in Coventry and Warwickshire which are identified in the HEDNA¹⁵, justify a departure from the use of the Government's Standard Method for assessing local housing need, in line with paragraph 61 of the NPPF December 2023¹⁶.
 - It is agreed the 35% cities uplift applies specifically to the Government's Standard Method as referred to in the 2023 NPPF paragraph 62 and supporting Guidance and has been deleted in the 2024 NPPF revision. It relates only to specific cities and there is no requirement for this to be redistributed. It is agreed this figure was not evidenced by Government and did not reflect local need.
 - All parties will work together to address Strategic Employment Needs as shown in Table 6.

¹⁵ See summary section 5, paragraph 5.159 to 5.161 of the HEDNA.

¹⁶ In line with the Transitional Arrangements under which the Coventry Local Plan is being reviewed.

Table 6: Residual Strategic Site needs 2022-2045 – Icení HEDNA
- WMSESS Alignment Paper – November 2024

Opportunity area*	Residual Need
Area 5 – North Warwickshire	50 – 100ha
Area 7 – M6/A45/A46/M45 Coventry and Rugby	9 – 84ha
Area 8 – A46 / M40 Warwick	75 – 125ha

*As set out in the WMSESS these are broad areas they do not represent Local Authority administrative boundaries

- The plan making process will ultimately establish the capacity of each area, and the quantities of housing and employment development that can be delivered.
- Each local authority is committed to ongoing cooperation and engagement by both officers and members in relation to delivery of housing and employment land for the Coventry and Warwickshire area. Should any authority identify a shortfall, the Local Authorities will seek to work constructively together to explore how the needs of the HMA and/or FEMA may be accommodated within the appropriate geography.
- This MOU will be reviewed as necessary in light of any changes to the National Planning Policy Framework (NPPF) and any new relevant new legislation.
- All parties confirm the understanding that Coventry City Council is proceeding with progressing its plan under the current transitional arrangements and as such it is being prepared in line with the NPPF December 2023. Should this position change the MoU will be reviewed.

5. POINTS YET TO BE RESOLVED

- Distribution of housing and employment: if any LPA within the area determines they are unable to deliver the amount of housing or employment as identified in the tables contained in this MoU then further discussions will be held and the MoU will be revised as appropriate.
- Coventry City Council considers that it cannot meet its residual need of 45 hectares to 2041 and is requesting assistance from partners across the FEMA to help meet its Local Employment Need shortfall. However, the extent of this shortfall has not yet been agreed with partners and has been subject to challenge by other FEMA authorities. The detailed extent of agreement and disagreement will be set out in Statements of Common Ground with the

relevant FEMA authorities.

- Discussions regarding strategic employment need are underway across the FEMA in relation to the Opportunity Areas identified in the WMSESS but how this will be accommodated is yet to be resolved.
- Rugby Borough Council has identified a need for 47 Gypsy and Traveller pitches beyond that which it can meet within its administrative boundaries. It has written to the other signatories to this MOU, together with its neighbouring authorities in Leicestershire and Northamptonshire to seek assistance in meeting this unmet need.

6. LIMITATIONS

- For the avoidance of doubt, this Memorandum shall not fetter the discretion of any of the Councils in the determination of any planning application, or in the exercise of any of their statutory powers and duties, or in their response to consultations, and is not intended to be legally binding but shows clear commitment and intent to meeting the full housing and employment needs of the market area.
- The objectively assessed need figures set out in this MOU have not yet been tested at examination and do not supersede the housing or employment land requirements in current local plans.

7. LIAISON

- Member level representatives of the Local Authorities will meet when appropriate, in order to:
 - Maintain and update the memorandum, as necessary.
 - Monitor the preparation of Local Plans across the six authorities and discuss strategic issues emerging from them.

8. MONITORING

- Annual monitoring will be carried out for both housing and employment. This will be overseen by the Joint Monitoring Officers Group (JMOG) for the Coventry and Warwickshire area, who will agree monitoring targets to include permissions and completions.

9. SIGNATORIES

- Signed on behalf of **Coventry City Council:** 

Councillor N Akhtar, Cabinet Member, Housing and Communities

Date: 27th August 2025

- Signed on behalf of **North Warwickshire Borough Council:**

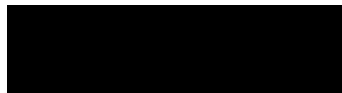
Date:

- Signed on behalf of **Nuneaton & Bedworth Borough Council:** 

Cllr Tony Venson

Date: 26.06.2025

Signed on behalf of Rugby Borough Council:



Date: 28 July 2025

Authorised Officer. KAREN HILLMAN

Sign No. 75/25

- Signed on behalf of **Stratford-on-Avon District Council:**

Date:

Signed on behalf of Warwick District Council:

Councillor Ian Davison – Leader



Date: 15/08/2025

- Signed on behalf of **Warwickshire County Council:**

Date:

MoU evidence of intent to sign

Stratford on Avon

RE: CCC Statements of Common Ground and Employment shortfall further work



Joanne Bozdoganli <Joanne.Bozdoganli@stratford-dc.gov.uk>
To: Eggington, Clare
Cc: Andrew Cornfoot

You replied to this message on 22/07/2025 14:21.

Reply Reply All Forward

Tue 22/07/2025 14:14

Hi Clare

The draft MOU was discussed at a number of meetings last week with councillors. The intention now is to proceed with signing of the document. I am about to go on leave for 2 weeks but will pick this up as a priority when I return to complete the signing for SDC.

Regards

Jo

RE: MoU chase up



Joanne Bozdoganli <Joanne.Bozdoganli@stratford-dc.gov.uk>
To: Eggington, Clare
Cc: Styles, Chris

You replied to this message on 01/09/2025 13:34.

Reply Reply All Forward

Mon 01/09/2025

Hi Clare

I think I mentioned at the last CSWAPO that I couldn't get sign off until our leader was back from leave, she is back today so I will be seeking her to sign off the MOU this week. I'll update you as and when it progresses.

Thanks

Jo

Warwickshire County Council

RE: Duty to Co-operate meeting 14 May 2025 AGENDA and papers



Chris Egan <chrisegan@warwickshire.gov.uk>
To: Eggington, Clare

You replied to this message on 14/05/2025 12:25.

Reply Reply All Forward

Wed 14/05/2025 12:22

Hi Clare, this is with my AD at the moment and I will chase to ensure we are signatory to this. I will send you an update early next week.

Regards

Chris

From: Eggington, Clare <Clare.Eggington@coventry.gov.uk>

Sent: 14 May 2025 11:49

To: Chris Egan <chrisegan@warwickshire.gov.uk>

Subject: RE: Duty to Co-operate meeting 14 May 2025 AGENDA and papers

Thanks Chris – could you just let me know what the process would be for sign off of the MoU from WCC please as they were a signatory to the previous one

RE: Duty to Co-operate meeting 14 May 2025 AGENDA and papers



Chris Egan <chrisegan@warwickshire.gov.uk>
To: ● Eggington, Clare

You replied to this message on 14/05/2025 12:25.

Reply Reply All Forward

Wed 14/05/2025 12:22

Thanks, I did not have any amendments to be made which is why I sent on to the AD, if you can send me the final copy with of any amendments today, I can ensure the right version is signed.

Regards

Chris

From: Eggington, Clare <Clare.Eggington@coventry.gov.uk>

Sent: 14 May 2025 12:15

To: Chris Egan <chrisegan@warwickshire.gov.uk>

Subject: RE: Duty to Co-operate meeting 14 May 2025 AGENDA and papers

Thanks Chris – I think there will be a few minor tweaks so will keep you posted
Clare

MoU chase up



Eggington, Clare
To: ○ Jo Bozdoganli; ○ Chris Egan
Cc: ● Styles, Chris

This message was sent with High importance.

Reply Reply All Forward

Mon 01/09/2025 09:41

Hi both

Sorry to keep chasing but SADC and WCC are the two remaining signatories on the MoU and I know you both advised me that you anticipated sign off by the end of August – and I know people have been away.

Subject to approval from Council tomorrow we aim to be submitting early next week so I am finalising the DtC compliance paper now, but holding fire on inserting the signed MoU. If you are unable to get your signed versions over to me this week, could you just respond confirming intent to sign so that I can insert email confirmation (and expected date of sign off) along with the MoU that has been signed by the other parties.

If you are anticipating sign off this week could you just let me know when, so I can work around that.

Many thanks

Clare



**North Warwickshire
Borough Council**

**Steve Maxey BA (Hons) Dip LG Solicitor
Chief Executive**
The Council House
South Street
Atherstone
Warwickshire
CV9 1DE

Clare Eggington
Planning Policy Manager
Regeneration and Economy
Coventry City Council
coventry.gov.uk

Switchboard : (01827) 715341
Fax : (01827) 719225
E Mail :
mikedittman@northwarks.gov.uk
Website : www.northwarks.gov.uk
This matter is being dealt with by
: Mike Dittman
Direct Dial : (01827) 719451
Your ref : |
Our ref : |

Emailed to: clare.eggington@coventry.gov.uk

Date : 30th July 2025

Dear Clare,

Coventry City Council Memorandum of Understanding 2025 (Local plan review)

As you will be aware a report on the Coventry City Memorandum of Understanding (MOU) for the Coventry Local Plan Review was considered at the North Warwickshire Borough Councils Local Plan Development Sub-Committee on the 1st July 2025.

For information a copy of the Committee Report and the subsequent minutes are attached to this letter (sent via email), see item 4 on the minutes. The Members at the Committee reflected on previous consultations and agreements with the City Council (and other Warwickshire Local Authorities) and determined not to endorse the recommendation at this point in time and not to sign the current MOU in light of a number of concerns around the employment land shortfall identified in the MOU.

These concerns can be summarised as follows:

- Members noted that at previous local plan reviews where shortfalls were identified, the relevant Local plan Inspectors required the issue of the shortfall to be addressed by partner local authorities within the Warwickshire and Coventry area, before progressing the Local plan Inquiry. Members raised concerns that this approach was not recognised or addressed by the MOU.
- The issue of the shortfall should not be left to post examination of the Coventry City Plan as this implies/assumes the shortfall will inevitably fall on the subsequent local plan reviews of adjoining local authorities in the Warwickshire area, with the last to reach Public Inquiry potentially facing having to address all or most of the shortfall identified.
- The Members therefore sought further clarity on how the shortfall will be addressed, seeking re-assurance and details that all possible measures and approaches have been considered by the City Council to address the shortfall within its own administrative boundaries.
- Members also raised the lack of direct consultation or discussion of the shortfall issue between NWBC Members and Councillors at Coventry City, an approach that had been supported and welcomed previously in other Local plan reviews (N&BBC). Members are therefore requesting that a meeting be agreed and arranged between the Councillors of the two authorities for further discussions, before endorsing or signing any subsequent MOU.

Chief Executive: Steve Maxey BA (Hons) Dip LG Solicitor

Members understand and appreciate the short time frames facing local authorities aim to review and submit their local plans under the current system before the 2026 deadline. However, in light of previous local plan review and experiences in Warwickshire they believe it is important that all issues are adequately and reasonably addressed before final submission stage is reached, to ensure the best opportunity of achieving a 'Sound' plan and avoid potential known pitfalls in the Inquiry process.

I trust that you will find the above comments and responses to the Coventry Local Plan Review Memorandum of Understanding 2025 Document useful, but if you require any further [clarification](#) please don't hesitate to contact the forward planning team at this office.

Yours sincerely,

A black rectangular box used to redact the signature of Mike Dittman.

Mike Dittman
Senior planning policy officer
Forward Planning Team
North Warwickshire Borough Council

Agenda Item No 6

Local Development Framework Sub-Committee

1 July 2025

Report of the Chief Executive

Coventry and Warwickshire Memorandum of Understanding 2025

1 Summary

- 1.1 This report informs Members and seeks endorsement of the Coventry and Warwickshire Memorandum of Understanding.

Recommendation to the Sub-Committee

- a That the Coventry and Warwickshire Employment Memorandum of Understanding is endorsed and signed; and**
- b That the comments and concerns in this Report are forwarded to the City Council, along with any Member comments received.**

2 Background

- 2.1 Coventry, Solihull and Warwickshire Local Planning Authorities have a long history of working closely and co-operatively together on cross boundary matters. Members may recall that the Borough Council agreed back in 2016 to be party to a Memorandum of Understanding (MoU) on housing and employment with authorities from the Coventry and Warwickshire area. The previous round of plan-making relied on these Memorandum of Understanding regarding delivery of housing and employment growth, particularly delivering housing and employment arising from Coventry.
- 2.2 The MoU's helped inform Local Plan requirements across the sub region, as they established a framework for co-operation between the constituent authorities with respect to the delivery of unmet needs for housing and employment across the Coventry and Warwickshire HMA. North Warwickshire accommodated within the adopted Local Plan's housing requirement an element for the unmet housing needs from Coventry. No employment needs were identified as part of the MoU's.
- 2.3 This report now brings to Members attention a new MOU initiated by Coventry as a result of the Coventry City Council Local Plan Review currently at Regulation 19 submission stage, but will also be used by all of the Warwickshire

local authorities in the next round of local plans. The MoU is seeking agreement as part of the Duty to Co-operate requirements to demonstrate effective and on-going joint working.

3 The Memorandum

- 3.1 Attached as **Appendix A** is the new Draft Memorandum of Understanding.

4 Observation

- 4.1 This new Memorandum is primarily a statement of the current planning situation, using the findings from the various evidence base studies and reports for the Coventry Warwickshire area, including [Coventry and Warwickshire Housing and Economic Development Needs Assessment](#) 2022 (HEDNA), the West Midlands Strategic Employment Sites Study (WMSESS) 2023/2024, which further informs the strategic employment needs of the HMA/FEMA, and the Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (2024) that updates the Housing and Economic Development Needs Assessment (HEDNA 2022) employment evidence and presents the current levels of employment need and supply across the HMA/FEMA.
- 4.2 The MOU is also seeking agreement to an ongoing collaborative process to address the housing and economic development needs of the market area. The MOU does not seek any housing land to be provided within the Borough from within the Coventry and Warwickshire Housing Market Area, which is welcomed.
- 4.3 However, with regards to employment needs, the MOU highlights a “residual need” of employment land for Coventry. The total local need figure for Coventry for the period 2021-41 was calculated to be 105 hectares. From this Coventry had a supply of 60 hectares and a residual need of 45 hectares. Despite repeated Call for Sites, Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it is unable to accommodate a 45 hectare shortfall. It has also made them aware that a Green Belt site (11 hectares developable to the east of the city) is being promoted but that it has been rejected through site assessment.
- 4.4 Discussions are ongoing through Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) and the linked Duty to Co-operate Group as well as direct discussions with the associated Local Authorities regarding this matter. There currently remains an outstanding issue that has not yet been resolved. In part this is because most partner authorities are at earlier stages of plan preparation other than in the case of Nuneaton and Bedworth Borough Council. They were in examination with hearings underway with no indication of the extent of any shortfall from Coventry.
- 4.5 Coventry City is also requesting the signing of Statements of Common Ground (SoCG) with each of the individual authorities partners to the MOU. A copy of

the draft SoCG Template is also attached for Members information as **Appendix B**.

- 4.6 Coventry City Council propose the issue of how the employment land “residual need” is to be addressed will be through the process of discussion around the individual Statements of Common Ground with each partner local authority. However, officers have some concerns over this approach in light of previous Inspectors comments around earlier Local Plan Inquiries, such as the Warwick District Local Plan Inquiry in 2015. The Inspector sought clarity over how Warwick DC’s local plan was going to address the unmet housing need existing in Coventry at that time. This resulted in further work between all the partner local authorities to both identify how that unmet need was to be addressed and, more specifically within which partner local authorities and the amount each authority would be able or prepared to accommodate. It is therefore considered that although the Borough Council broadly supports and is prepared to sign the new MOU, the following concerns still need to be raised;
- how the issue of the residual employment need will be addressed needs clarification and confidence in delivery, in order to ensure the Coventry Local Plan review will be considered “sound” by the Inspector at the Local Plan Inquiry
 - that the lack of clarity over how and where this residual need will be met/addressed increases pressure on partner authorities own Local Plan reviews and increases the potential for additional development pressures and needs their own Plan reviews may have to address.

5 In Summary

- 5.1 This Council is in general support of the MOU for the Coventry Local Plan Review submissions stage (Regulation 19) subject to the comments made above and need for clarity on how the identified residual employment need will be addressed.
- 5.2 To note any further comments and observations Members may make towards agreement to sign the MOU and any strategic issues arising and potentially impacting on the plan and other partner local authorities.

6 Report Implications

6.1 Environment and Sustainability Implications

- 6.1.1 The signing of the MOU will support the Coventry Local Plan Review (Regulation 19) submission stage (2025), which has a separate sustainability appraisal and Habitats Regulation Assessment (HRA). Supporting the City Council to achieve a sound Local Plan will also help control and direct development to appropriate sustainable locations and help minimise potential environmental impacts.

6.2 Risk Management Implications

- 6.2.1 The contents of the MOU are noted but the situation will need continued monitoring and negotiation as part of the work on the drafting of the Statement of Common Ground, in order to mitigate any future risk or pressures on our Local Plan arising from the identified residual employment need capacity shortfall within Coventry City area. No further specific risk management implications noted.

6.3 Legal Implications

- 6.3.1 The Duty to Cooperate was introduced by the Localism Act 2011 and placed a legal duty upon local planning authorities in England to engage constructively, actively and on an ongoing basis with neighbouring authorities on the preparation of a Local Plan particularly to address strategic cross boundary matters. The Duty requires local planning authorities (officers and members) to engage in proactive and sustained joint working to address strategic issues that cut across administrative boundaries from the outset of Plan preparation and come to agreements on solutions, where possible.
- 6.3.2 The Borough Council are supportive of Coventry City intentions to maintain current approaches and joint work or monitoring with other specified authorities and persons via effective and appropriate means (as must this Council) in the preparation of local plan documents.

The Contact Officers for this report are Dorothy Barratt (719250) and Mike Dittman (719451).

NORTH WARWICKSHIRE BOROUGH COUNCIL

MINUTES OF THE LOCAL DEVELOPMENT FRAMEWORK SUB-COMMITTEE

1 July 2025

Present: Councillor M Watson in the Chair

Councillors Hayfield, Humphreys, H Phillips, O Phillips, Ridley, Simpson and Symonds.

Apologies for absence were received from Councillors Dirvieks (Substitute Councillor H Phillips) and Hobley.

1 Disclosable Pecuniary and Non-Pecuniary Interests.

There were none declared at the meeting.

2 Minutes of the meeting of the Local Development Framework Sub-Committee held on 26 February 2025.

The minutes of the meeting of the Local Development Framework Sub-Committee held on 26 February 2025, copies having been previously circulated, were approved as a correct record and signed by the Chairman.

3 Statement of Community Involvement

The Chief Executive Informed Members of minor amendments to the Statement of Community Involvement (SCI) and sought approval to adopt the SCI in accordance with the Planning and Compulsory Act 2004.

Resolved:

- a That the proposed changes to the Statement of Community Involvement be approved; and**
- b That the Statement of Community Involvement be adopted.**

4 Coventry and Warwickshire Memorandum of Understanding 2025

The Chief Executive Informed Members and sought endorsement of the Coventry and Warwickshire Memorandum of Understanding.

Resolved:

- a That the Coventry and Warwickshire Employment Memorandum of Understanding is not endorsed until there is clarity over how the 45ha residual employment need will be addressed; and**
- b That the comments and concerns from Members are forwarded to the City Council.**

5 Draft Employment Development Plan Document

The Chief Executive sought the Sub-Committee's approval for the Draft Employment Development Plan Document, to be known as the Draft Employment Plan, for consultation subject to the finalisation of the Sustainability Appraisal and Habitats Regulations Assessment.

Resolved:

That the Draft Employment DPD be brought back to Members for further discussion.

6 Review of North Warwickshire Local Plan 2021

The Chief Executive reviewed the current adopted Local Plan 2021 and recommended the policies which should be the focus for the Issues and Options, Regulation 18 stage.

Resolved:

- a That the policies recommended be the focus of an Issues and Options Regulation 18 paper but to also include LP10 and to consider new policy areas; and**
- b That at the next meeting an Issues and Options document for consultation be considered.**

*Mike Dittman
Forward Planning Team
North Warwickshire Borough Council
South Street
Atherstone
CV9 1DF*

Planning Policy

Coventry City Council
PO Box 7097
COVENTRY
CV6 9SL

coventry.gov.uk

E-mail: clare.eggington@coventry.gov.uk

Customer reference :

Our reference :

5th August 2025

**re: Coventry City Council Memorandum of Understanding
2025 (Local Plan Review)**

Dear Mike

Thank you for your letter dated 30th July 2025, along with the report to the Local Plan Development Sub-Committee dated 1st July 2025 and associated minutes of that meeting. The update is appreciated.

Clearly, we are disappointed that Members decided not to support the officer recommendation to sign the MoU, as they wanted to see how the shortfall was to be resolved before signing. The MoU was worded specifically to acknowledge the ongoing discussions as matters not yet resolved, however we note the concerns and would comment as follows.

In terms of how previous Local Plans dealt with matters around development shortfall, it has been made clear from ongoing discussions with partners across the Functional Economic Market Area (FEMA) that with plan progress being at very different stages of preparation the necessary assessment work has not yet been finalised to determine whether or not the capacity exists to assist with this. Coventry City Council has acknowledged this position and has welcomed constructive references in emerging Local Plans to considering this matter further as plans evolve, hence the ongoing discussions.

It is considered unreasonable to expect Coventry City Council to delay the progress of its plan to align with those at earlier stages of plan preparation. As NWBC Members recognise in their deliberations, the government expects swift progress on plan-making. Coventry is utilising the transitional arrangements to bring its adopted Local Plan up to date as swiftly as possible through the process of review rather than a new local plan. This includes accommodation of its own housing growth needs rather than also asking neighbouring Local Authorities to assist this time round.

Please be assured that through the process of plan-making, Coventry is actively seeking to resolve the issue of the employment shortfall. This includes having responded to representations which asked us to consider how much employment land in our administrative area could be recycled (for example modernisation of premises) and which could therefore count towards our supply. We have undertaken this assessment: a paper was circulated to FEMA authorities recently and we consider this could yield circa 8.42 further hectares towards our supply.

Discussions have been ongoing for several months regarding the MoU, housing and employment matters. The Alignment Paper was particularly important in terms of employment as it clarified matters of need and supply and enabled us to assess the position in more detail. Additionally, we have also undertaken an Employment Land Review (resulting in additional policy protections for key employment sites) and run 5 calls for sites which included a bespoke employment focused exercise. As you know, call for sites yielded little, but you are aware we have rejected an 11ha employment Green Belt proposal due to harm to the Green Belt, to the landscape and in regard to the quality of agricultural land. We know this is an area of disagreement between the FEMA parties as set out in some partner representations to Regulation 19 and we are developing Statements of Common Ground with each authority which will pick up this issue if it is something they raised specifically in their submissions.

We wrote formally to FEMA partners on 13th February 2025 to request assistance with the shortfall, having raised the issue through CSWAPO and the Duty to Co-operate sub-group which was developing the MoU. This letter went to senior officers in each authority and invited feedback and further discussion.

The letter itself was not directly responded to, but NWBC submitted representations to the Regulation 19 consultation on 27th February 2025. Members were clearly engaged in the matter as the representations were accompanied by a copy of Item 9 of the Local Development Framework sub-committee (26th February 2025) which considered the Regulation 19 response prior to its submission to the City Council. The summary of the report (paragraph 6.1) states that:

'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.'

Noting that matters were not resolved around the shortfall, the MoU was worded accordingly to reflect this, and to reflect ongoing discussion to seek a solution.

In the light of the above (and noting that the MoU is not currently signed by NWBC) we are seeking to produce a Statement of Common Ground with each of the FEMA authorities to reflect individual circumstances and matters raised in representations. An initial draft is enclosed with this letter for your perusal and further discussion so we can be clear on which matters we agree, and which we do not.

Finally, given the importance of employment land matters to all of the FEMA authorities, we would also welcome discussion on the Employment Land DPD which North Warwickshire is developing. I note that this was included as an item on the same Local Development sub committee as the MoU (1st July 2025) and that it was resolved that *'the Draft Employment DPD be brought back to Members for further discussion'*. It would be helpful to understand progress on this document in more detail.

If NWBC feels that Members would find a discussion with our Cabinet Member to be helpful we would be willing to facilitate that. Please let us know and we can sort a date and venue.

I look forward to hearing from you.

Yours sincerely,

Clare Eggington
Planning Policy Manager
Coventry City Council

Appendix 5 Waste

From: Planning Policy <Planningpolicy@coventry.gov.uk>

Sent: 12 December 2024 16:22

Subject: Duty to Cooperate - Minerals and Waste

Dear Partners

Coventry City Council will be publishing the Coventry Local Plan Review document (Regulation 19) in the first quarter of 2025 having now been approved by our Cabinet. We are writing now to give you advance notice but also to seek your views as to how best we fulfil our responsibilities to proactively engage with our Duty to Cooperate (DtC) partners in relation to Minerals and Waste planning matters.

Whilst we would naturally look to the WMRTAB and WMRAWP in the first instance, we would particularly like any input you may have in terms of sharing your thoughts and experience as to what you think works well with other Local Planning Authorities in relation to the DtC over and above the partner bodies stated in this message.

Happy to discuss further if required.

Thank you.

Kind Regards

Planning Policy Team
Coventry City Council

From: Planning Policy

Sent: 20 January 2025 12:17

Subject: FW: Duty to Cooperate - Minerals and Waste

Dear Partners

Further to our email below, we can now confirm that the Coventry Local Plan Review Regulation 19 consultation is now live until 3 March 2025.

As communicated previously, we have concluded that the current Local Plan policies covering minerals and waste matters remain up to date, but as a Duty to Cooperate partner we would welcome any views you may have on this and further discussion if you feel this to be necessary.

To access the consultation material, please visit: <https://coventrycitycouncil.inconsult.uk/Reg19/consultationHome> and for all our evidence base documents, please visit: <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

Regards

Thank you.

Kind Regards

Planning Policy Team
Coventry City Council

From: Ian Blake <ian.blake@cpresources.co.uk>
Sent: 21 January 2025 21:06
To: Haigh, Rob <Rob.Haigh@coventry.gov.uk>
Cc: Eggington, Clare <Clare.Eggington@coventry.gov.uk>
Subject: Re: Duty to Cooperate - Minerals and Waste

Hi Rob,

Coventry has signed the WMRTAB statement of Common Ground so nothing more for you to do there. Without checking I don't know if you've prepared a Duty to Cooperate Statement but if not then I suggest you include details of the WMRTAB and note the meetings that have occurred that you've attended during your plan making period.

Other matters to consider are the reliance Coventry has on surrounding areas to meet its needs for waste management over the plan period. Again without checking I suspect you have sufficient recycling and other recovery capacity within your area to meet your requirements over your plan period but I don't know where you stand wrt landfill and whether you will need to rely on surrounding areas? If that is the case you may want to enter into statement (s) of common ground with WPA(s) hosting the capacity setting out that the WPA accepts that waste from Coventry could be managed in their area over the plan period. Clearly Coventry's need for landfill should be decreasing substantially over the plan period.

The attached national protocol on Duty to Cooperate provides some guidance. It may help if you are able to say that you have considered this in determining the DtC action you have taken (or are taking).

I hope that helps but please let me know if you have any further queries.

Best wishes,

Ian

Ian Blake

Director

From: Haigh, Rob <Rob.Haigh@coventry.gov.uk>
Sent: 20 May 2025 10:24
To: Ian Blake <ian.blake@cpresources.co.uk>
Cc: Eggington, Clare <Clare.Eggington@coventry.gov.uk>
Subject: RE: Duty to Cooperate - Minerals and Waste

Hi Ian

Thank you for your response.

We have been undertaking internal discussions which are underway and in terms of assessment processes we plan to create a link/hook in our Infrastructure Development Plan (IDP) that sits alongside the Local Plan to take account of the points raised in your representation.

Therefore, and on reflection, we do not consider a meeting with you is necessary at the current time, but we will of course continue to discuss and cooperate with WMRTAB, as partners, throughout the Local Plan Review process.

Regards

Rob

Rob Haigh MRTPI
Senior Planning Policy Officer
Planning Policy Team
Coventry City Council
024 7697 2214
coventry.gov.uk

On 20 May 2025, at 13:16, Eggington, Clare <Clare.Eggington@coventry.gov.uk> wrote:

Thanks Rob

Ian – could you confirm that you are happy with this approach? Given that timescales for producing and updating various plans and strategies vary, this is an approach which is consistent with the way we have treated other areas of the plan where we have created the 'hook' so that the most up to date information is used at any given point in time and at this point we think the IDP is the most logical 'home' for this

Kind regards

Clare Eggington
Planning Policy Manager
City Services
Coventry City Council
02476 972751
coventry.gov.uk

Re: Duty to Cooperate - Minerals and Waste



Ian Blake <ian.blake@cpresources.co.uk>

To Eggington, Clare

Cc Haigh, Rob



Wed 21/05/2025 14:57

Hi Claire,

Usually waste needs assessment are standalone but I see no issue with approaching it this way. It might helpful to include details of how the capacity requirements were calculated in an appendix with the headline values included in the body of the IDP.

Best wishes,

Ian

Ian Blake

Director



West Midlands Resource Technical Advisory Body

Statement of Common Ground

September 2022

1. Introduction - WMRTAB and the Duty to Co-operate

2. The Localism Act 2011 introduced a Duty to Co-operate, which is designed to ensure that all the bodies involved in planning work together on strategic matters that are of larger than local significance. The bodies bound by this duty include local planning authorities, county councils, LEPs and the Environment Agency. Evidence of co-operation is required to demonstrate the soundness of Development Plan documents. Such evidence might include joint plans or policies, a memorandum of understanding, or jointly prepared informal strategies.
3. The West Midlands Resource Technical Advisory Body (WMRTAB) is a group comprising waste planning and management officers of the Waste Planning Authorities (WPAs) in the West Midlands, the Environment Agency, representatives of industry including the waste management industry, and representatives of environmental organisations.
4. The role of WMRTAB was originally given formal status in the Government's Planning Policy Statement (PPS) 10. Briefly, this role was to advise the Regional Planning Body on technical strategic waste planning issues. Consistent with this role, WMRTAB has pro-actively commissioned technical work and made technical contributions to planning at the strategic level on behalf of constituent organisations.
5. The Government's current policy on waste planning¹⁷, which sits alongside the National Planning Policy Framework, replaced PPS10 and notes that:

'Waste is a strategic issue which can be addressed effectively through close co- operation between waste planning authorities and other local planning authorities and public bodies to ensure a suitable and sustainable network of waste management facilities is in place.'

6. It goes on to set out actions that constitute effective cooperation under the Duty to Cooperate:
 - *'gathering, evaluating and ensuring consistency of data and information required to prepare Local Plans. This may include joint commissioning of studies or the joint preparation of an evidence base*
 - *engaging actively in dialogue, particularly on those types of wastes or waste facilities that will impact most on neighbouring authorities*
 - *active engagement, where necessary, with planning authorities wider than just those who are their more immediate neighbours, particularly if dealing with waste streams for which there is a need for few facilities*
 - *jointly monitoring waste arisings and capacity.'*
7. The above matters are all addressed in WMRTAB's agreed Terms of Reference.

¹⁷ National Planning Policy for Waste, 2014

WMRTAB Objectives and Activities

WMRTAB meets regularly (at least two times a year), providing an invaluable opportunity for stakeholders to inform and involve each other regarding progress on waste plans and developments relating to waste management in the West Midlands. As such it brings together a wide range of expertise in what is a very specialist area of planning. WMRTAB also monitors waste management and planning trends, focussing on wider than local patterns and setting the context for plan making and monitoring at the local level.

WMRTAB's latest terms of reference, adopted June 2021, includes the following:

'The overarching aim of WMRTAB is to support co-operation between WPAs and others, by providing objective and authoritative technical advice concerning the sustainable management of material resources and strategic waste management data, issues, and development policies and proposals. In particular, WMRTAB will help WPAs meet their requirements under the DtC.'

WPAs are invited to bring to WMRTAB at the appropriate stages in the plan-making process any significant cross-boundary issues, and to give notice of such matters and provide any relevant information in advance of the meeting. In its consideration of such issues, WMRTAB will explore to what extent the plan has analysed the available data to demonstrate that appropriate provision is being made for an amount of waste equivalent to that generated in its area, allowing for known imports and exports; and whether specific sites or areas are identified to make provision for waste management

WMRTAB has also prepared a series of Joint Monitoring Statements for the wider West Midlands area, and it is intended to continue to prepare similar information on a regular basis.

The activity of WMRTAB currently occurs on an informal basis. It continues because of its perceived value amongst participant stakeholders. If it is to add full value in terms of the Duty to Co-operate, however, WMRTAB's role should be formally recognised by WPAs (and preferably others to whom the Duty to Co-operate applies).

In establishing the need for co-operation, members WMRTAB will follow the protocol prepared by the Chairs of regional Waste Technical Advisory Bodies including WMRTAB as included in Appendix 2.

Signatories

This statement is agreed by the waste planning authorities listed in Appendix 1a. A separate document is maintained on the WMRTAB area of the Local Government Association Knowledgehub website¹⁸ showing details of signatories. The template for this document is included at Appendix 3. In signing this document, each signatory confirms that it endorses the role, and will support the work, of WMRTAB as set out above and in the attached terms of reference.

¹⁸ <https://khub.net/group/west-midlands-resource-technical-advisory-body>

Appendix 1a - WMRTAB Terms of Reference

West Midlands Resources Technical Advisory Body Terms of Reference

Updated June 2021 (Final)

Introduction

The West Midlands Resource Technical Advisory Body (WMRTAB) is a group consisting of: Waste Planning Authorities (WPAs), primarily from the former West Midlands Region; representatives from the waste management industry; and other interested parties. Member organisations are listed in Appendix 1.

Under the Planning and Compulsory Purchase Act 2008, WPAs are required to prepare Local Plans which set out how and where waste can be managed in their areas over a 15 year period.

National Planning for Waste states that: *“In preparing Local Plans, waste planning authorities should:...work collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management;”*

Waste arising in one WPA area will frequently be managed in another. For example, in order to achieve economies of scale, waste management facilities will often have a catchment which extends beyond the boundary of the planning area within which it is situated. Planning to ensure that sufficient capacity is available to meet future requirements for the management of waste therefore constitutes a ‘strategic matter’ and falls under the ‘Duty to Cooperate’ (DtC). The DtC requires local planning authorities to engage ‘constructively, actively and on an ongoing basis’ when addressing strategic waste planning matters in their Waste Local Plans.

The need for cooperation between WPAs and other bodies on waste is reflected in National Planning Policy for Waste and the Waste Management Plan for England 2021 which states:

‘Strategic policy-making authorities should cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters, including policies contained in local waste plans. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. Further consideration is to be given as to the optimal way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared in areas with significant strategic challenges.’

Aims

The overarching aim of WMRTAB is to support co-operation between WPAs and others, by providing objective and authoritative technical advice concerning the sustainable management of material resources and strategic waste management data, issues, and development policies and proposals. In particular, WMRTAB will help WPAs meet their requirements under the DtC.

Specific areas of activity

In order to meet the above aims, WMRTAB will:

- Bring together a wide range of expertise in what is a very specialist area of planning through a wide membership including waste planning and management officers of the Waste Planning Authorities (WPAs) in the West Midlands, the Environment Agency, representatives of industry including the waste management industry, and representatives of environmental organisations;
- Identify strategic issues affecting the sustainable management of waste e.g. waste hierarchy, proximity principle and self-sufficiency;
- Undertake and/or commission technical work where there are identified benefits from work being undertaken at larger than local scale;
- Prepare guidance and best practice to be followed by Member WPAs;
- Formally respond, as a body, to the technical evidence base and policy documents of member authorities and other strategic and national consultations¹⁹. Responses will be based on any guidance/best practice notes prepared by WMRTAB;
- Notwithstanding the above, provide comments on member WPA compliance with the Duty to Cooperate when its waste planning policy is published for representations;
- Raise awareness of waste management as an integral part of the circular economy/climate change agenda and contribute to the waste/resource management planning agenda on a national level and within the WMRTAB geographic area;
- Raise awareness of the role of WMRTAB generally e.g. by attendance at relevant meetings and events and also through the preparation of articles for relevant publications.
- Where invited, provide WMRTAB representation on groups and at workshops where strategic waste planning matters are discussed e.g. Local Enterprise Partnerships, West Midlands Combined Authority, National Waste TAB Chairs;
- Take part in online discussion/information sharing groups to help build skills and knowledge with the WMRTAB membership;
- Provide and/or commission training and support for Member organisations related to waste planning;

Member WPAs engaging each other (and other WPAs) on strategic waste management matters may have regard to WMRTAB Duty to Cooperate Guidance.

To assist with the effective running of the group WMRTAB shall:

- Publish evidence documents, guidance, meeting minutes, agendas etc online for member authorities to access and use at public examination as required;
- Prepare and monitor an annual business plan that identifies specific activities to take place with a 12 month period under the above categories;
- Meet twice a year;
- Contribute to the preparation of meeting agendas to ensure discussion of relevant strategic matters (Minutes will be prepared by a designated minute- taker on a rotating basis);
- Review and update (as necessary) these Terms of Reference on an annual basis.

Member WPAs will make a financial contribution to the organisation and running of the group. This will include the costs of employing an independent Chair.

Member agreement

¹⁹ This will not fetter the ability of Member authorities to make their own representations as appropriate.

All organisations listed in Appendix 1b agree to membership of the group on the basis of the terms set out in this document.

Appendix 1b WMRTAB Member Organisations

N.B. This list is subject to change but was correct at 30 June 2021

Waste Planning Authorities:

Birmingham City Council;
Coventry City Council;
Dudley Metropolitan Borough Council;
Herefordshire Council;
Sandwell Metropolitan Borough Council;
Solihull Metropolitan Borough Council;
Shropshire Council;
Staffordshire County Council;
Stoke on Trent City Council;
Telford & Wrekin Council;
Warwickshire County Council;
Walsall Metropolitan Borough Council;
Wolverhampton City Council; and,
Worcestershire County Council

Waste Management Industry:

Biffa and Veolia (nominated by the Environmental Services Association),
MVV
Robert Hopkins Ltd and NISP/ International Synergies

Other Interested Parties:

Waste Disposal Authorities
Adjoining Waste Planning Authorities
Environment Agency
Friends of the Earth on behalf of Sustainability West Midlands
Representatives from other (R)TAB groups

Appendix 2 - Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England

Living Draft Version 5.1 – 8 July 2021

Introduction

The management of waste has no regard to administrative boundaries, with waste arising in one waste planning authority's area frequently being managed in another. Furthermore, in order to secure economies of scale, waste management facilities will often have a catchment which extends beyond the boundary of the planning area within which it is situated. This is recognised in the current²⁰ National Planning Policy for Waste that expects waste planning authorities to: *“plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;”*. For these reasons the management of waste is a cross boundary strategic matter, the planning for which requires co- operation between waste planning authorities.

Local Planning Authorities have a duty to cooperate on "strategic matters" relating to sustainable development or use of land that has or would have a **significant** impact on at least two planning areas.

Since the introduction of the Duty to Cooperate there has been a tendency for WPAs to consult other WPAs where cross-boundary movements of waste are recorded with little consideration of the significance prior to consultation taking place.

This note is a guide to waste planning authorities (WPAs) in England on the basic process associated with engaging other WPAs with a view to ensuring compliance with the Duty to Cooperate (DtC). It is intended that this note will help ensure a consistent approach to this matter across England whilst reducing the burden of consultation in relation to issues which are unlikely to be significant across multiple planning areas. Furthermore, the adoption of consistent 'accepted' practices may help

²⁰ The version of National Planning Policy for Waste referred to in this document was published on 16 October 2014: <https://www.gov.uk/government/publications/national-planning-policy-for-waste>

with evidencing compliance of the process of preparing waste planning policy with DtC legislation during its independent examination.

This note covers DtC engagement between WPAs (including National Park Authorities) only.

The note does not constitute legal advice.

General

Engagement between WPAs will take place where it is considered that a strategic level of movements is taking place on an ongoing basis. Engagement will be initiated as part of a WPA's plan making but may also occur when strategic capacity begins operation or is lost.

The purpose of engagement is for WPAs to satisfy themselves that it is appropriate to plan on the basis that a certain quantity of a certain type of waste arising in their area, which is deemed to be strategic, may continue to be managed in another WPA area over the plan period.

Engagement should ideally result in agreement on ongoing waste movements between WPAs and **this may be achieved by an exchange of letters rather than via a separate Statement of Common Ground** (SCG). The need for a SCG will be agreed between the parties involved but should take into account the National Planning Policy Framework and Planning Practice Guidance²¹.

It should be noted that where agreement cannot be achieved this does not necessarily mean that there will be a failure to comply with the Duty to Cooperate.

Guidelines for strategic waste movements

What constitutes a 'Strategic' level of waste movement will vary between WPAs.

²¹ NPPF Paragraph 27 states: "In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these."

The levels set out below have been agreed in London, the south east and east of England as **a starting point** for considering whether dialogue is required. **The levels are a guide and not a rule i.e. they are not thresholds.** A WPA may still choose to engage another WPA where waste movements are below these levels although it is less likely that a formal Statement of Common Ground would be appropriate.

Non-hazardous waste²² – 5,000 tonnes per annum

Inert waste²³ - 10,000t inert per annum

It should be noted that these guideline levels relate to total quantum of movement to an area rather than to a single site. For example, if a WPA exports 6000 tonnes of inert waste to Site X and 6000 tonnes of inert waste to Site Y located in the same area then specific engagement should take place. However, for hazardous waste especially, smaller movements to single sites may occur and so movements may not be strategic.

The guideline levels relate to waste being exported from one WPA, or one joint waste planning area, to another.

What constitutes a strategic level of **hazardous waste**²⁴ movement will vary greatly depending on:

How much hazardous waste is produced in a WPA area;

What type of hazardous waste is produced e.g. the tonnage relating to strategic movements of cement bonded asbestos will be much higher than that relating to waste chemicals; and,

The number of facilities capable of managing a certain type of hazardous waste

A guideline value of 100 tonnes for hazardous waste has been agreed in London, the south east and east of England but for some WPAs and for some types of hazardous

²² Non-hazardous waste is waste without hazardous properties but may decompose to release pollutants.

²³ Inert waste is waste that does not undergo any significant physical, chemical or biological change.

²⁴ Hazardous waste is waste that is dangerous or difficult to treat, keep, store or dispose of and if improperly handled carries a risk of adverse impact to humans, animals and the environment.

waste a quantity much greater than 100 tonnes will be considered strategic (see paragraph 15 below for further considerations). In the North West a value of 500tpa has been used.

The guideline levels relate to waste being exported from one WPA, or one joint waste planning area, to another.

The West Midlands Resource Technical Advisory Board has proposed a protocol for identifying movements of waste which may be considered strategic. This is included on the WMRTAB knowledgehub website²⁵ and may be utilised by any WPA.

Data Sources

The main sources of waste data are the Waste Data Interrogator (WDI), Hazardous Waste Data Interrogator (HWDI) and Incinerator Returns. These are publicly available on data.gov.uk. It should be noted that from 2019 the Incinerator Returns are included in the WDI but prior to this year the data is separate.

The Environment Agency advise that the HWDI represents reasonably accurate data for the hazardous waste stream. However, the HWDI does not include information on which sites receive the waste so, while the two datasets rarely show the same figures, it helpful to include hazardous waste data from the WDI where it is available to try and identify recipient sites.

Notification

Initial engagement is usually to agree the data on movements of waste and identify any reasons why similar movements of waste cannot continue in future e.g. due to the closure of a site. It is the responsibility of the recipient authority to raise any such issues with the exporting authority and to request a statement of common ground if required. Ultimately if no response to such notification is received this may be assumed to mean agreement. An example letter is included at Appendix 2a.

²⁵ <https://khub.net/group/west-midlands-resource-technical-advisory-body>

Following initial engagement, further discussion will be necessary between WPAs to identify whether there is an issue that requires strategic cooperation. There may also be other locally specific circumstances that are appropriate to trigger discussions under the DtC. Matters to consider are as follows:

Is the ongoing waste movement wholly reliant on a single site for management?

*If the quantum of movement is below the guideline levels is it likely to increase in future?
E.g. due to other sites closing.*

Are other WPAs (including the host WPA) relying on a particular site for the future management of waste arising in their areas and if so is there a risk that the capacity becomes over committed?

Is the distance of the ongoing movement (i.e. from point of arisings to point of management) consistent with the proximity principle? If it isn't then it is likely that alternative management options need to be considered.

When contacting the receiving WPA it would be useful to include trend data of the scale of imports for at least the last 3 years but ideally 5 years as this helps identify any anomalous years. *It is recognised that inclusion of trend data may be onerous and discussion with the Environment Agency on how such trend data can more easily obtained from its databases will be sought.*

Where a WPA manages waste from another area and is updating its waste planning policy, it will notify the WPA of the exporting area. This will likely be notification at the initial stages under Regulation 18.

Regardless of whether movements exceed the guidelines, all WPAs should notify every other WPA when commencing work on waste planning – this will act as a ‘safety net’ and allows for changes in the guidelines for ‘strategic’ movements. This will likely be notification at the initial stages under Regulation 18.

N.B. A database of generic Waste Planning Authority contacts is available via the regional waste technical groups and will be published on the National Waste TAB Chairs Knowledgehub website.

While SCGs recognise the availability of capacity they cannot allocate specific capacity to meet specific WPA demands. In this sense the principle of ‘first come first served’ does not apply. It is incumbent on all WPAs to monitor, via authority monitoring reports, the availability of capacity to meet ongoing requirements. If it appears that a deficit in capacity is emerging due to over reliance on specific sites then it is incumbent on all affected WPAs to consider alternative arrangements and, ultimately, make updates to policy if required. All SCGs should include an agreement to monitor the provision of capacity and to be updated accordingly.

Appendix 2a: Example DtC Letter

Dear

Duty to Co-operate: cross-boundary movements of waste

[The exporting WPA] is currently preparing its [name] Waste Local Plan. Further information can be found [here](#).

The Duty to Cooperate requires planning authorities to seek agreement with other planning authorities where their plans may have an impact on their area. I am writing to you as part of the duty to co-operate, about strategic waste exports from [the exporting WPA] to your area.

What constitutes a 'strategic' level of waste movement will vary between waste planning authorities, however the guideline levels set out below have been agreed in London, south east and east of England as a starting point for considering whether dialogue is required. These levels are for the total quantum of movement to an area rather than to a single site.

Non-hazardous waste – more than **5,000 tonnes** per annum

Inert waste - more than **10,000t** inert per annum

What constitutes a strategic level of **hazardous waste** movement varies depending on:

How much hazardous waste is produced in a WPA area;

What type of hazardous waste is produced; and,

The number of facilities capable of managing a certain type of hazardous waste

A guideline value of 100 tonnes for hazardous waste has been agreed in London, the south east and east of England.

I have asked five questions below to initiate duty to co-operate engagement on waste.

Q1: Do you agree with the following waste exports figures? Exports of HIC and CDE waste

Site Name	Site Type	Type of Waste	2015	2016	2017	2018	2019

Source: Waste Data Interrogator and Incinerator Returns

Exports of hazardous waste

Type of waste	Management route	2015	2016	2017	2018	2019

Source: Hazardous Waste Data Interrogator and Waste Data Interrogator

Q2: Do you consider recent movements of waste from [the exporting WPA] to your area to be of 'strategic' importance?

Q3: Are you aware of any planning reasons why similar movements of waste cannot continue in the future (for example any planned closure of facilities)?

Q4: The NPPF requires planning authorities to prepare statements of common ground to document and address strategic cross-boundary matters. Do you consider a statement of common ground is necessary with [the exporting WPA] on cross-boundary movements of waste?

Q5: Are there any other matters you wish to raise at this stage?

I would be grateful for a response to the above questions by [date]. If you have any problems responding, please let me know.

-

Appendix 3 – Template for Details of Signatories of the WMRTAB Statement of Common Ground

Birmingham City Council

Name of Signatory

.....

Position

.....

Signature

Date.....

Coventry City Council

Name of Signatory: Sarah Elliott

Position: Head of Fleet and Waste Management

Signature:

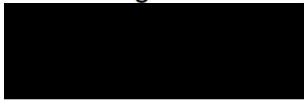
A solid black rectangular box used to redact the signature of Sarah Elliott.

Date: 06/12/2022

Dudley Metropolitan Borough Council

Name of Signatory: Helen Martin

Position: Director of Regeneration & Enterprise


Signature: 

Date: 30th May 2024

Dudley Metropolitan Borough Council

Name of Signatory: Helen Martin

Position: Director of Regeneration & Enterprise

Signature: 

Date: 30th May 2024

Herefordshire Council

Name of Signatory: Tracey Coleman

Position: Interim Director of Planning & Regulatory Services

Signature:



Date: 27 September 2022

Sandwell Metropolitan Borough Council

Name of Signatory: Tony McGovern

Position: Director of Regeneration and Growth

Signature: 

Date 06 January 2023

Solihull Metropolitan Borough Council

Name of Signatory

.....

Position

.....

Signature

Date.....

Shropshire Council

Name of Signatory

.....

Position

.....

Signature


Date.....

Staffordshire County Council

Name of Signatory Mark Parkinson.....

PositionHead of Planning Policy and Enabling.....

Signature Parkinson, Mark (E,I&S)

 Digitally signed by Parkinson, Mark (E,I&S)
Date: 2023.03.02 09:30:38 Z

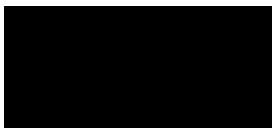
Date..... 1 March 2023.....

Stoke on Trent City Council

Name of Signatory: Harmesh Jassal

Position: Strategic Manager – Planning Services

Signature



Date 23/02/23

Telford & Wrekin Council

Name of Signatory

.....

Position

.....

Signature

Date.....

Warwickshire County Council

Name of Signatory

.....

Position

.....

Signature

Date.....


Walsall Metropolitan Borough Council

Name of Signatory Simon Neilson

.....

Position Executive Director of Economy, Environment & Communities

.....

Signature 

Date 3 January 2023
.....

Wolverhampton City Council

Name of Signatory: Vijay Kaul

Position: Section Leader Planning)

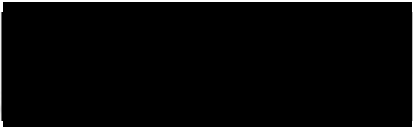
Signature ...V.Kaul.....

Date.....01/02/2023.....

Worcestershire County Council

Name of Signatory: Emily Barker.....

Position: Head of Planning and Transport Planning.....

Signature: 

Date: 26th September 2022.....

Draft Notes of WMRTAB Meeting: Wednesday 4th December 2024**Attendees:**

Alice Bates - Stoke-on-Trent City Council
Ben Horowitz - Worcestershire County Council
Chris Egan - Warwickshire County Council
David Bray - Staffordshire County Council
Edward West - Shropshire Council
Ian Blake (IB) - Cool Planet Resources and Chair
James Stewart Irvine - Biffa/Environmental Services Association
Liz Forster - Walsall Council
Mark Watkins - Sandwell Metropolitan Borough Council
Martin Everett - Environment Agency
Paul Wilcox - Warwickshire County Council
Rachel Blanchard - Telford and Wrekin
Rebecca Schofield - Worcestershire County Council
Rob Haigh - Coventry City Council
Sarah Jones - Dudley Council
Mark Clinton - Dudley Council
Vijay Kaul - City of Wolverhampton Council
Rebecca Brown - Birmingham City Council

1. Introductions made. Apologies received from:
Chris Crean - FoE; Christina Davey - DLUHC; Victoria Eaton - Herefordshire Council; Laura Croshaw - Staffordshire County Council

Rachel Blanchard volunteered to prepare notes.

2. Notes from December 2024 meeting agreed and most of matters arising actioned.
Outstanding action: Send any ideas for articles for Tripwire to IB to forward to James Hoskinson
3. Member Updates:
- Coventry: Going to cabinet with Reg 19 in December with a view to go out for consultation in January 2025.
 - Shropshire: Still in EIP for Local Plan Review. Recently hearing sessions have been paused until further notice.
 - Dudley: Reg 19 consultation finished at the end of November with a view to submit in early 2025.
 - Stoke: New Local Plan timetable recently agreed. Reg 18 consultation anticipated end of 2025, not sure if it will include waste at that point.
 - Solihull: Local Plan has been withdrawn. Call for sites underway. New scheme published.
 - Walsall: Revision to LDS going to cabinet in December. Aiming for December 2026 submission. Call for sites included waste sites.

- Birmingham: Reg 18 consultation finished in August. Aiming for October for Reg 19 consultation.
 - Staffordshire – a closure notice had been issued to Whalley's Quarry landfill. Noted this site has a capacity 400ktpa.
 - Warwickshire County Council: No update on local plan at the moment – waiting for new plan making system.
 - Worcestershire County Council: Position has not changed - they have paused to ensure sound evidence base and not aiming to meet the 2026 deadline.
 - Telford & Wrekin – Aiming for Reg 19 consultation in February 2025.
Action: Responses to these Local Plan consultations will be prepared by WMRTAB in due course
 - General comment about need for training on preparation of waste needs assessments. IB noted that similar training being sought in the South East. **Action: IB to provide update on this when training in South East has been arranged.**
4. Environment Agency update – Martin Everett:
- Continuing to update Waste Data Interrogator (WDI) training with some worked examples.
 - It was raised that a lot of local authority planners need more training for Minerals and Waste planning.
Action: ME to forward training information to IB for review.
 - IB highlighted that any anomalies discovered in the WDI can be reported to the EA to increase accuracy. ME can be the contact to report any anomalies – also customer service contacts to get calls logged and waste.planning@environment-agency.gov.uk
 - ME raised the importance of local plans including reference to the circular economy.
5. Update to West Midlands Landfill Study/Study on Residual Waste in West Midlands:
- IB had circulated a draft copy of the study prior to the meeting.
 - Other RTAB groups studies consider residual waste and recovery facilities also.
 - Mark Clinton (Dudley) mentioned the residual waste is dropping - particularly focused on food waste.
 - Worcestershire has some real concerns about data and the need to model different scenarios. Propose the study considers a business-as-usual approach and then looking at the single scenario if the EFW capacity drops off and nothing is replaced (as well as the scenario in the draft study).
 - RS asked for step by step description of how residual waste arisings were estimated to be included in an Appendix case we have to replicate the data.
 - RS asked ME to explain how landfill capacity is estimated by the Environment Agency. Noted this is based on operator submissions which may change.
Action: RS to email request to ME.

- IB to consider removing applications that are just not coming forward anymore but still have permission.
 - LF has circulated an updated spreadsheet as there was some links issues within the document.
 - **Action: All to send comments to IB by 10th January 2025.**
6. Feedback from National Waste TAB Chairs Group: IB provided an update.
- Group last met in November 2024.
 - Future issue of Anaerobic digestion. Discussion of any advice that could be put together for helping waste planning authorities.
 - Group should be aware that an application in for carbon capture at the Rookery South energy from waste plant in Central Bedfordshire.
 - Consultation on 'Brownfield Passports'. From a waste site, concern that there is no consideration for encroachment on existing waste management facilities.
7. Other Central/local announcements/consultations
The following had been published which should be of interest to the group:
- [National Development Management Policies](#) (article)
 - [Planning and Infrastructure Bill](#) (article)
 - [Planning Reform Working Paper: Brownfield Passport](#)
 - [Strategic plan for long-term energy infrastructure](#)
 - [Circular Economy Taskforce](#)
 - [Environmental Improvement Plan progress report 2023-2024](#)
 - [Review of Environmental Improvement Plan](#)
 - [New Climate Change target](#)
 - [Waste Data Interrogator 2023](#)
 - [UK Statistics on Waste](#)
 - [Government response to the Climate Change Committee 2023 adaptation progress report](#)
 - [ESA study on waste site encroachment](#)
8. Next meeting: 5th June 2025 10.00-13.00.
Will consider potential for site visits at next meeting in light of visit to Sherbourne Recycling in November.
Action: IB looking to arrange a member site visit in Dudley – date/venue to be confirmed. MC to assist.
9. AOB:
- Aim to get DHLUC update in the new year. **Action IB.**

- ME had question around Council plans been included as a statutory document in local plans.
- Concern raised around RTPI [licentiates](#) applications for full membership being rejected as application made on basis of minerals and waste experience only which is not considered adequate.

Appendix 6 Environment Agency

Coventry City Council Local Plan Review (2021 - 2041)



Statement of Common Ground between The Environment Agency and Coventry City Council

August 2025

Organisations

- Coventry City Council (CCC)
- Environment Agency (EA)

1. Introduction

1.1 This Statement of Common Ground (SoCG) has been prepared by Coventry City Council and the Environment Agency in relation to the Coventry Local Plan Review. It reflects the position between the two parties on a number of strategic matters and shared issues. This SoCG covers the Local Authority area of Coventry.

1.2 The purpose of the Statement is to document the strategic matters being considered and the progress made in cooperating to address them. It focuses on areas where there is agreement, and those matters where work is ongoing in order to reach agreement. The Statement is intended to be 'live' and updated as circumstances change, and the aim is to reach agreement on any outstanding issues.

1.3 The Statement also forms part of the evidence to demonstrate compliance with the Duty to Co-operate during the preparation of the Coventry Local Plan Review. The Environment Agency was consulted at each consultation stage associated with the Local Plan at Issues and Options (Reg 18) and Publication (Reg 19) stages.

2. Purpose and List of Parties Involved

2.1 The parties involved include Coventry City Council and the Environment Agency.

2.2 The SoCG provides a record of discussions between the parties and how far this has gone towards resolving issues. Meetings will continue on an ongoing basis and the SoCG may be updated accordingly.

3. Strategic Matters and Record of Agreement / Areas of Ongoing Discussion

3.1 The approach to the Statement of Common Ground is to follow the structure of the representations made by the Environment Agency (EA) at Regulation 19 stage and Government guidance¹.

3.2 In their representation submitted as part of the Coventry Local Plan Review (at Regulation 19 stage), the EA expressed a number of comments / concerns in relation to several policies. The following items set out the current position in relation to those elements and where agreement has been achieved and where matters remain under discussion.

Overall Compliance

3.3 It is agreed between parties that there are no legal compliance or duty to co-operate issues. However, there are matters the EA have raised regarding soundness and concerns on the basis that some of the site allocations are not appropriately justified and therefore perhaps not deliverable due to insufficient reasonable supporting evidence.

i) Issues raised by the EA through Regulation 19 representations: New Allocations – Flood Risk

3.4 Since the Issues and Options consultation and based on the information included in the Proposed Submission document, the EA understand new site allocations are proposed to meet the increased housing need within the Plan Review. Comparing Table 6.2 'Site Allocations for Housing' to the adopted Local Plan allocations, the EA understand allocations H2:26 – H2:38 are new and have not been previously

allocated. The EA are aware of at least one of these new allocations, H2:36 Spon End, being at risk from fluvial flooding.

3.5 Comparing the sites assessed through the Housing and Economic Land Availability Assessment (HELAA (November 2024)) in comparison to the proposed allocations, the EA also note allocations H2:37 and JE2:2 have both been identified as being in the flood zone. However, both sites either have permission granted or have been delivered.

3.6 The EA note Table 2 in the HELAA sets out how planning considerations have been assessed for the purposes of the HELAA assessment. With regards to the flood risk, the EA is unclear what further assessment has been carried out for allocations identified as being within Flood Zone 2 and 3, particularly for H2:36 Spon End. In line with the recommendations set out in paragraph 1.3 of the Level 1 Strategic Flood Risk Assessment (SFRA (October 2022)) and the National Planning Practice Guidance (NPPG), where allocations are proposed in flood risk areas, a Level 2 SFRA is usually required.

3.7 Whilst the EA note allocation H2:36 comprises of regeneration of an existing residential site, the allocation is for 750 dwellings, an uplift of 300 homes on site currently. The EA note the HELAA refers to the need for new build development on this site to be designed such that flood risk is mitigated and confirms with the policy requirements of EM4 Flood Risk Management.

3.8 The EA welcome the essential site-specific requirements also identified in Table 6.2 in respect of allocation H2:36 Spon End - *“Enhancement and improvement to the River Sherbourne and consideration given to the associated floodplain. Majority of the site is in Flood Zone 2 and part with Flood Zone 3.”* However, the EA maintain a Level 2 SFRA should still be undertaken to further inform the site allocations which are identified via the Level 1 SFRA (and/or the HELAA) as being at risk of flooding.

3.9 The EA maintain the undertaking a Level 2 SFRA will also enable the Council to address paragraphs 172, 178 and 179 of the National Planning Policy Framework (NPPF) which relate to the Sequential and Exception Tests. The Level 2 assists with part (b) of the Exception Test, in demonstrating that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

3.10 A Level 2 SFRA assesses the site-specific risks informing the Councils determination on the overall deliverability and acceptability of the site allocation. It will help to determine what capacity of development will be possible within the site boundary. It will need to demonstrate that any potential mitigation measures could protect the site and would not increase flood risk elsewhere taking account of the latest climate change guidance. This may require the running of new or additional flood models in line with the EA's flood modelling guidance.

3.11 The EA want the Council to undertake a Level 2 SFRA to further inform the site allocations which are identified via the Level 1 SFRA (and/or the HELAA) as being at risk of flooding. The EA state it will also enable the Council to address paragraphs 172, 178 and 179 of the National Planning Policy Framework (NPPF) which relate to the

Sequential and Exception Tests. The Level 2 assists with part (b) of the Exception Test, in demonstrating that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. The Level 2 SFRA assesses the site-specific risks informing the Councils determination on the overall deliverability and acceptability of the site allocation. It will help to determine what capacity of development will be possible within the site boundary. It will need to demonstrate that any potential mitigation measures could protect the site and would not increase flood risk elsewhere taking account of the latest climate change guidance. This may require the running of new or additional flood models in line with the EA's flood modelling guidance. The EA advise the Council will need to ensure a Level 2 SFRA is prepared and the site assessment outcomes inform decisions on site deliverability, the Sequential and Exception Tests and site policies and design guidance. The SFRA consultants will need to screen sites requiring a Level 2 Assessment.

Coventry City Council response and further discussion with the EA regarding allocations and flood risk

3.12 The Council acknowledge that allocation H2:36 Spon End is a new allocation and at risk from fluvial flooding. However, this site is currently subject to a live planning application² so all flood risk issues are being considered as part of the planning application process which is subject to formal consultation with the Environment Agency as a statutory consultee. It is therefore not appropriate for further assessment on the allocation to be undertaken (in regard to the local plan) at this current time, in order to avoid confusion between the plan-making (policy) and decision-taking (development management) processes. It should be noted that at the present time there are unresolved objections from the EA in regard to the planning application proposals.

3.13 The Council acknowledges that the EA is unable to comment further on the suitability of the allocation at the current time because it remains the subject of a live planning application to which the EA has outstanding objections. Further updates will be provided to the Local Plan examination in terms of the status of the planning application and whether the outstanding matters have been resolved.

3.14 In respect of the sequential test and SFRA Level 2, the Council, the Lead Local Flood Authority and the Environment Agency agreed at its meeting on 02 May 2025 (see Appendix 3), that a SFRA Level 2 is not required for site allocations which were previously allocated as part of the adopted Coventry Local Plan. The principle would only apply to new proposals. In reality, only the Spon End proposal referred to above would trigger this requirement.

3.15 A Level 2 Strategic Flood Risk Assessment (SFRA) and Sequential Testing are related but distinct processes used in plan making to manage flood risk. The SFRA level 2 is a comprehensive assessment of flood risk across the city, while the Sequential Test is a decision-making tool that guides development away from areas at higher flood risk across the city. The Council has set out its approach to the sequential test, in Appendix 1 and 2. The EA has confirmed that it does not provide bespoke comment on the consideration of flood risk Sequential Tests and instead leaves this for LPAs to assess. The Council confirms that it is satisfied that the flood

risk Sequential Test has been met as part of the consideration of the live planning application at Spon End (PL/2025/0000548/FULM).

3.16 For clarity, in terms of assessing sites for the Local Plan, the following three sites include areas of potential flood risk.

1. Canley Police Station, Fletchamstead Highway;
2. Land at Spon End (see above); and
3. Charles Ager, Smithford Way.

However, it should be noted that Canley Police Station and Charles Ager sites are shortlisted sites selected as part of the Housing and Economic Land Availability Assessment (HELAA) 2024. They are not proposed as new allocations contained in the Coventry Local Plan Review as specified in Policy H2³. Notwithstanding, and for completeness, the Council have tested the above sites as part of the sequential test and the assessment is set out in Appendix 2.

ii) Other advice submitted by the EA by letter accompanying the Regulation 19 Representations: Water Quality and Resources

The following paragraphs set out the content of the letter and the result of discussion with the EA.

3.17 The EA note the Level 1 Water Cycle Study (WCS) 2024)) considers headroom capacity at the existing wastewater treatment works (WwTW) in Warwickshire in consideration of allocations in adopted local plans, residential and employment commitments, recent completions and windfall allowance. This does not appear to include the new allocations proposed as part of the Local Plan Review.

3.18 The EA note Figure 11-3 illustrates the Coventry WwTW Catchments, with the majority of the area within the receiving catchment of Finham Coventry Sewage Treatment Works (STW). Appendix 9: STW headroom assessment goes on to confirm that Finham STW has an amber RAG status due to an estimated 9% headroom exceedance. However, based on the STW comments, *'AMP8 quality scheme planned the scope of which will contribute towards environmental compliance'*.

3.19 The EA maintain that where there is an identified constraint (amber or red) the Council should demonstrate that there is a solution (it may be already programmed, or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Water Company. The outcome of this may inform a 'phasing' policy within your plan where appropriate. It may also be necessary to produce an 'Infrastructure Delivery Plan' to set out any key milestones for waste water infrastructure upgrades and improvements. The evidence the Council produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable. The EA note note some reference to this in Part 2. Policy EM6 Redevelopment of Previously Developed Land.

3.20 Bearing in mind the new allocations do not appear to be included in the headroom capacity assessment in the WCS, the EA would leave it to the Council to determine whether there is sufficient capacity or planned capacity in the receiving STW(s) to serve Coventry's growth (in combination with growth proposed in neighbouring

councils where applicable), without causing significant deterioration of receiving water bodies.

3.21 The EA welcome reference to the Water Framework Directive (WFD) in Policies CC1 Part B and EM6 and the emphasis on Sustainable Drainage Systems (SuDS) in Policy EM5 and the preference for nature-based solutions in Policy GE1. WFD reference of course applies to the whole plan area, not just the City Centre. In our opinion one of the key issues with WFD compliance in Coventry is diffuse source pollution from urban development. In particular, the Plan refers to the Rivers Sherbourne and Sowe, both of which are not achieving 'good' WFD status for phosphate. We encourage the need to manage phosphorus pollution which is possible via the policies set out in the Plan.

3.22 The EA note Policy H7 refers to 'adequate sewerage connections'. As outlined previously, the Council may wish to include reference to the foul drainage hierarchy to provide clarity. Severn Trent's Water Resource Management Plan (WRMP), the Warwickshire Avon Abstraction Licensing Strategy and the Severn River Basin Management Plan (RBMP) have not been updated since the publication of the WCS. Therefore, the policy that was used to determine the 2024 WCS is still applicable.

Further to the above advice, the following has been agreed through discussion between the EA and the Council.

3.23 The Council has set out how it will address any existing and future waste water capacity challenges in its Infrastructure Delivery Plan. This is a 'live' document which can be updated accordingly to meet any changes that may occur in the delivery and implementation of the Local Plan policies during the Plan period.

3.24 Notwithstanding, the Councils evidence base which supports the policies in the Local Plan Review (Coventry Water Cycle Study (2024)), identifies there is capacity to support growth across Coventry. However, the water environment and water services infrastructure cannot support all the development in the proposed allocations until further investigations and upgrades have been completed. There are some areas such as the City Centre, where growth is largely unconstrained by the water environment but others, such as the SUE's (previously allocated through the adopted local plan), which have some level of constraint and will require on-going collaborative working between the Council, Environment Agency and Severn Trent Water to resolve.

3.25 In respect of water supply, water resources used to supply drinking water to the North West of the city are under pressure, and whilst Severn Trent can undertake system improvements to augment resources and reduce leakage, managing demand remains a core part of the solution. Therefore, new build developments should conform to at least the basic levels of water efficiency. It is important that development is carefully phased to ensure the integrity of supply.

3.26 In respect of waste water and sewerage, the Council considers there is sufficient capacity at existing wastewater and treatment facilities to accommodate growth provided locational phasing requirements are considered where this might be necessary and this is a matter being discussed with STW and the IDP will be updated accordingly.

iii Other advice submitted by the EA by letter accompanying the Regulation 19 Representations: Flood Risk

3.27 The EA previously advised minor amendments to the wording of Policy EM4 Flood Risk Management. The EA are pleased to see some of these suggestions have been included but the following suggestions remain: Section 1 c. could be reworded as follows: *“it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity. An assessment of the ability of development to provide additional flood storage capacity and improve flow paths must be undertaken”*. Section 1 d. refers to ‘land not at high risk’. To avoid confusion over what is meant by this, the Council may wish to replace this with *“land outside of the 1 in 100 year plus climate change flood event based on an assessment of hazard risk (see DEFRA Hazard rating)”*. This approach is in accordance with Section 8.1.3 and 8.1.4 of the 2017 Level 1 SFRA.

3.28 With regards to section 2 c., the EA suggest the Council might wish to seek an assessment of what betterment is possible on sites, the policy wording could be reworded as follows *“All development must undertake an assessment and implementation plan on what Environmental and Flood Risk Betterment can be provided by the proposals. The assessment should include but not be limited to, River Restoration, enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse and creation of flood alleviation measures”*. This approach is in accordance with Section 8.1.6 of the 2017 Level 1 SFRA.

3.29 In respect of Section 2 d. this refers to watercourse easement. The EA previously suggested this section should seek to enhance the easement given to all types of watercourse. In relation to main rivers, in certain areas where local issues dictate, we would encourage that this is extended to 20m. Potential text could state: *Unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m (from the top of bank or toe of a flood defence (in certain areas, this may be increased to 20m) of Main Rivers and Ordinary watercourses for maintenance access, the creation of space for future flood risk management measures and to create habitat corridors. This easement includes existing culverted watercourses. This is required regardless of the extent and location of the floodplain and should be taken into account when considering the developable area.”*

3.30 The EA also note section 2 e. refers to finished floor levels 600mm above the 1 in 1000 year plus climate change flood level. The EA usually recommend 600mm above the 1 in 100 year plus climate change flood level (design flood level).

3.31 The Council note and acknowledge these suggested changes and agree to consider the changes proposed through the process of the Local Plan Examination.

iv Other advice submitted by the EA by letter accompanying the Regulation 19 Representations: Groundwater and Contaminated Land

3.32 The EA stress the following comments relate solely to protection of controlled waters. As outlined previously, the majority of the council area is underlain by

Sandstone bedrock, designated as a Principal Aquifer. This is the most sensitive aquifer designation as such strata are capable of supporting regionally important groundwater abstractions and support to watercourses. There is also limited superficial cover in these areas, which makes the aquifer more vulnerable to pollution. The city centre area does contain multiple potable groundwater abstractions and is therefore within source protection zones. Based on the above, the local plan area is considered highly sensitive in terms of controlled waters receptors.

3.33 The EA note the Proposed Submission document reflects much of their advice, particularly in the supporting text of Policy EM6 (paragraphs 13.20-13.23). As suggested before, the Council may wish to include reference to the protection of controlled waters in the context of Sustainable Drainage Systems (SUDS) in Policy EM5.

3.34 The Councils evidence base (Coventry Water Cycle Study 2024) confirms overall, there is capacity to accommodate growth and the risk of fluvial or watercourse flooding is either low, or can be mitigated. Although surface water flooding is widespread and would be present at many development sites, careful planning and implementation can mitigate the issues through the use of natural attenuation and infiltration methods. Sustainable Drainage Systems and the use of multipurpose green spaces will be a key element in supporting sustainable drainage and reducing the risk of flooding. Detailed flood risk assessments will be required to support planning applications where appropriate all of which is reflected in policies EM4, EM5 and EM6.

3.35 The Council also note and acknowledge these suggested changes and agree to consider the changes proposed through the process of the Local Plan Examination

4. Duty to Cooperate Agreement

4.1 The parties agree that constructive and active engagement has taken place on strategic matters to date and will continue to do. The parties recognise that there are outstanding issues and that both will continue to work closely and where relevant with other prescribed bodies on strategic issues.

5. Signatories and Governance Arrangements

5.1 In terms of governance, the authorities agree:

- that in response to any new evidence / changes in circumstances, informal discussions will occur between the parties on the issues referred to in this SoCG in the form of officer level meetings with escalation to more senior levels where necessary.
- that this SoCG will be reviewed when required including adding additional issues that may be identified through the process of the Local Plan Review.

Coventry City Council

Name: Chris Styles

Position: Head of Planning Policy and Environment

Date Agreed: 27th August 2025

Signature:



Environment Agency

Name: Mrs Tessa Jones

Position: Planning Specialist

Date Agreed: 22 August 2025

Signature: Mrs T Jones

Appendix 7 Historic England

Coventry City Council Local Plan Review: Regulation 19 Duty to Co-operate with Historic England

Date: 24th February 2025

Venue: Meeting conducted via Teams

Attendees

Elizabeth Boden	Historic England
Neil Rimmington	Historic England
Maria Viciano-Martinez	Historic England
Chris Styles	Coventry City Council
Daniel Taylor	Coventry City Council
Chris Berry	Coventry City Council

Minutes

AGENDA ITEMS	
1	<u>Introduction and apologies</u> Apologies: Clare Eggington – Coventry City Council
2	<u>Overview of the Local Plan Review - CCC</u> CS – gave a high-level overview of the where the Local Plan Review is currently at and the anticipated forward timeline.
3	<u>Evidence Base</u> CS – set out that a dedicated Archaeology policy is now proposed as part of the Local Plan review, whereas in the current local plan Archaeology matters are incorporated into the heritage policies. EB – requested to see the assessment / evidence base for the site allocations and heritage impact assessments (HIAs) as there is particular concern over the height that some of the buildings may have to be and what this could mean for view cones of the spires. CS – emphasised the View Management framework SPD and its reference within plan review policy to ensure that proposed developments have to fully consider these impacts.

	<p>EB – we would expect the council to undertake archaeological work prior to allocating Whitefriars Car Park to show it is deliverable. South Worcestershire local plan has done this for some of their sensitive sites in the last 6 months.</p>
4	<p><u>Sites for discussion</u></p> <p><u>H2:26 – Central Police Station</u> EB – Quantum seems high and would necessitate tall buildings. HE would want to see the work on site capacity/deliverability of number of units proposed alongside the impact on the view cones.</p> <p><u>H2:27 – New Union Street Car Park</u> EB / MV – Quantum seems high and the site is in the path of a view cone. NR – Site is north of Cheylesmore gate so could have interesting archaeology.</p> <p><u>H2:30 – Whitefriars Street Car Park</u> EB – site of most concern and HE likely to object to the allocation. EB – site between two listed buildings (Whitefriars Gate and Whitefriars Monastery). NR – site is in the outer court of the friary so could include ancillary buildings such as guest accommodation. The site of the monastic community here could be of national significance. The site is expected to yield good archaeology given limited development of the site and shallow foundations. The preference would be for this site to not be included as an allocation. EB – archaeological investigations (GPR etc.) of the site should be carried out ahead of allocating it to determine whether the allocation can be delivered.</p> <p><u>H2:32 – Dale Buildings</u> MV – Likely objection over potential height/capacity as the site is within a view cone. Site is also adjacent to listed buildings and a registered park and garden. HIA recommended prior to allocation. NR – There is potential for the city wall to be running through the site. Preference is for policy to include wording requiring any proposed development to respond to the city wall and for particular attention to be paid to the approach up to Cook Street gate in terms of scale and appearance.</p> <p><u>H2:33 – Allesley Hotel</u> MV - Overall supportive, but we would expect to see the non-designated front building retained as it makes a positive contribution to the Conservation Area. NR – Noted within the car park you can read the historical boundary of Allesley Park and future development should acknowledge this. CS – Noted that assessment of heritage impacts inclusive of non-designated heritage asset considerations would be undertaken through CCC Conservation Officer in assessment of planning proposals.</p> <p><u>H2:37 – City Centre South</u> NR – in terms of archaeology it is about the city wall alignment. CS – Noted that HE had been fully consulted through the planning process on this site and the site now benefits from a planning consent.</p> <p><u>H2:38 – Friargate</u></p>

	<p>NR – main issue is the city wall alignment in the northern part of the site. No issues with the development south of the ring road.</p> <p>CS – Noted that the site benefits from a planning approval.</p>
5	<p><u>Site discussion summary</u></p> <p>EB - No fundamental objections to most of the allocations, but potential objection to Sites H2:30 and H2:32. HE asked for clarification on the deliverability of particular sites and the heritage impact assessments.</p> <p>CS - CCC to provide further clarification on work undertaken to assess site capacities. See point 7 below.</p> <p>CS - Wording could be added into Table 6.2 as the way to make changes to policy H2.</p> <p>CS - SoCG to be agreed.</p>
6	<p>AOB</p> <p>N/A</p>

7. Supplementary supplied in response to points raised.

Further to the meeting, the City Council have reviewed the request for the supply of further site assessment information, however at this stage of plan making process note that we are unable to introduce further evidence within the regulation 19 phase. Nevertheless, we have sought below to draw reference to the available published evidence base in regard to these matters and would comment as follows:

In respect of points made around allocation site indicated capacities on sites H26, 27 and 32, we would confirm that these capacity figures have been informed by our Urban Design and Heritage Team alongside planning officers; this assessment taking account of notable heritage assets which may be affected by development alongside assessing the site's role in wider townscape and providing a professional assessment of potential capacity in order to best inform our proposed supply. For reference, a number of site-specific considerations are highlighted both in table 6.2 of the regulation 19 plan, and also within the content of the HELAA which have fed through from this assessment process, the HELAA can be found within the regulation 19 evidence base at the following link:

<https://www.coventry.gov.uk/downloads/download/8046/housing>

Alongside these assessments which have been undertaken to inform our supply, we would also draw reference to policy H9 of the plan review which proposes (alongside all other plan policy tests) minimum density of development expectations across the authority area, these policy densities are also then also referenced within the HELAA and expressed as a unit quantum.

Looking forward into the Development Management process of assessment of planning applications upon our proposed development allocations, policy H9 alongside other plan policies, which mandate full consideration of setting of heritage assets including the necessity for evidence upon view cone impacts, would become the assessment tests for development proposals, and detailed proposals would be fully assessed by our Conservation Team through these processes. This assessment of impacts of development proposals would be undertaken notwithstanding the initial capacity assessments presented within the plan review, whilst case officers would also draw reference to the minimum density expectation within their assessments and recommendations.

Finally, we would also note that the proposed allocation of Whitefriars car park (H:30) follows from the site's inclusion within policy CC11 of the 2017 adopted Coventry City Centre Area Action Plan which states that proposals for the redevelopment, intensification and enhancement of the identified car parks, inclusive of Whitefriars Street Car Park, will be encouraged as part of the wider regeneration of the city centre. CCC believe that the proposed inclusion as a formal allocation now offers the opportunity to develop site specific requirements the site in regard to the highlighted Archaeology matters. Moving forward, CCC would be very happy to work with Historic England in order to develop appropriate wording through a statement of common ground approach which may pertain to a requirement of early-stage Archaeological assessments being required in order to inform development proposals.

Coventry City Council Local Plan Review: Regulation 19 Duty to Co-operate with Historic England

Date: 28th May 2025

Venue: Meeting conducted via Teams

Attendees

Elizabeth Boden	Historic England (HE)
Chris Styles	Coventry City Council (CCC)
Clare Eggington	Coventry City Council


Minutes



AGENDA ITEMS	
1	<p><u>Minutes of last meeting (24.02.25)</u></p> <p>EB raised a number of points in regard to the supplementary notes to the minutes (point 7):</p> <ul style="list-style-type: none"> • Paragraph 1: the reference to further evidence 'within the regulation 19 phase' was queried. CS clarified that this meant that at the time of the meeting, the Regulation 19 consultation was still live. ESB clarified that in response to their representations HE would be happy to consider further details in response to comments they had made. • Paragraph 2: this refers to professional assessments being undertaken however EB advised that this related to site assessment and that further work to evidence compliance with HE advice would need to be demonstrated in regard to the two sites to which HE currently objects i.e. H2:30 and H2:32. • In terms of the penultimate paragraph to point 7, in terms of the two sites which are the subject of objection, these need to demonstrate additional work now/prior to allocation and cannot be deferred to the Development Management process. • In terms of the final paragraph, there had been a difference in interpretation with HE considering that the Area Action Plan Policy CC11 part e intending that the car parks in the city would be redeveloped, intensified and enhanced for the same use, whereas CS advised that the intent was to include these as part of a suite of wider regeneration uses.
2	<p><u>Overview of the Local Plan Review - CCC</u></p> <p>CS – gave an overview of local plan progress, the intention is to take the Plan to Cabinet and Council in July, seeking authority to submit in August. An updated LDS would also go to these same meetings.</p>
3	<p><u>The Objection Sites</u></p> <p>H2:30 and H2:32. HE are not objecting to the principle of residential development on these sites but require more information as to how the potential impacts on heritage</p>



	<p>have been assessed. They will be relying on written submissions as they do not have the capacity to attend hearings in person.</p> <ul style="list-style-type: none"> • Whitefriars: the main concern is whether the level of development can be achieved and the potential for archaeology on the site. CS presented the workings for the site which addressed constraints, indicative layout, storey heights, buildings being located outside of the view cone, and capacity workings taking these matters into account. CS suggested that a modification could be made to the allocations table with some additional wording which would then apply to the planning application stage. EB advised this could potentially be addressed through the SoCG and requested that the further details were packaged up and sent to HE to review as the views of the archaeologist would also be needed. • Dale Buildings: CS showed the spatial map which included the various heritage assets and the view cones along with the context of a consented neighbouring development. He presented a 3D townscape model along with options for workings which would create open space which could provide opportunities to link to the Registered Park and Gardens and protect the views of the spires. The opportunities for a mitigation and enhancement strategy were discussed. CCC to package up the assessment information and send to HE for further consideration.
4	<p><u>Other matters raised by HE in the representations</u></p> <ul style="list-style-type: none"> • CCC indicated that they would be proposing modifications as suggested by HE. • There was a discussion around the representation to Policy HE4 (archaeology) which focuses upon para 11.14. CCC to set out the issues in an email to HE so EB can discuss internally with colleagues.
5	<p><u>Draft scope of the Statement of Common Ground</u></p> <ul style="list-style-type: none"> • EB provided an example of a recently signed SoCG which would provide a helpful steer in terms of similar issues being addressed elsewhere. • The scope will focus upon the areas of objection, although it is also helpful to refer to the other suggestions from HE and how these have been agreed and resolved.
6	<p>AOB</p> <p>N/A</p>


CCC site assessments and associated email below referred to above for further consideration by HE:


Draft notes of meeting and allocations assessment note





Eggington, Clare
To:  Boden, Elizabeth
Cc:  Styles, Chris

 Reply


 Reply All


 Forward






Tue 10/06/2025 09:50

 LPR Reg 19 CCC and HE Meeting Minutes 28 May 2025.docx
70 KB

 H2_30_Whitefriars Car Park_Assessment Note.pdf
1 MB

 H2_32_Dale Buildings_Allocation Assessment Note.pdf
947 KB

Good morning Liz

Please see attached draft notes of our meeting of 28th May which we would be grateful if you could review and let us have any amendments. As agreed in the meeting, please see attached assessment notes for you to discuss with colleagues.

In the meantime I will work on the SoCG and send a draft over shortly for us to work up in more detail once you have feedback. What do you feel would be a reasonable timeline for us to anticipate feedback from yourselves (we note that capacity at HE is very stretched)

Kind regards

Clare

Clare Eggington

Allocation H2:30 – Whitefriars Street Car Park

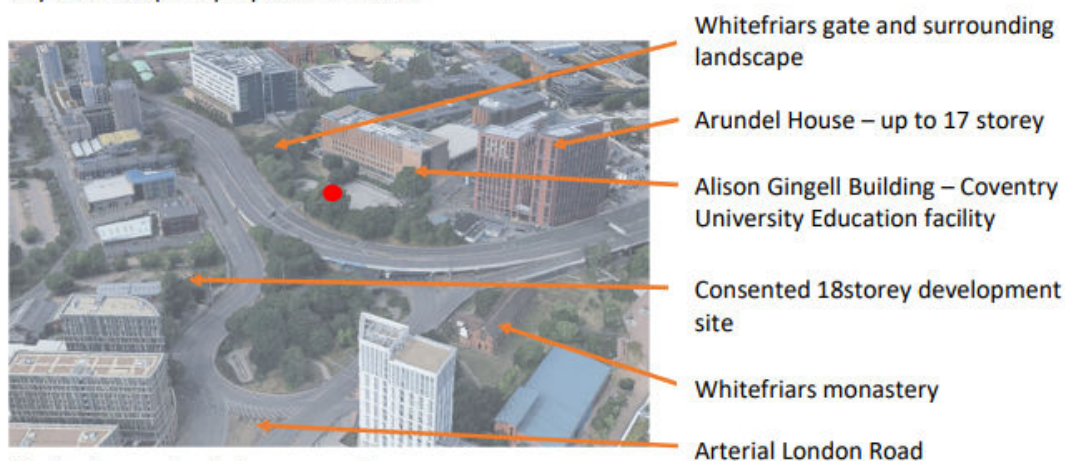
- Site Address – Whitefriars Street Car Park
- Site Area – approx. 0.6Ha
- Worked example basis – Market Apartments, NDSS standards inclusive, precedent mix.
- Assumed FFL to FFL = 3.2m
- City Centre Car Free Development example
- Apartment balcony private amenity space throughout + shared communal amenity space

The proposed allocation site is located aside the Coventry Ring Road, sited to the north of significant highway infrastructure of the junction of the London Road, linking the City Centre to the A45 to the South. Education facilities of Coventry University neighbour the site to the North, whilst significant heritage assets are present locally, to the West Whitefriars Gate and to the East (across the ring road) the Whitefriars Monastery.

The site is largely hard surfaced acting as a public car park, with mature vegetation bounding the site perimeters, a pedestrian linkage also crosses the site, linking Whitefriars Street, via underpass, to routes across highways junction to the South.

This area of the City has seen significant recent development, with a number of buildings of significant scale having been constructed within the past decade around the junction area, with further development also having been consented. These developments have together delivered a clear graduation of massing approaching the junction, forming a key informative to development upon the proposed allocation site.

Prescribed view cones 6 and 7 of the Coventry View Management Framework should also inform development proposals upon the site, with these view corridors either crossing or being adjacent to site. The site developable area is also informed by services crossing the site include the Coventry 'Heatline', where easement requirements to this service route can be expected to further inform any built footprint proposed in future.



Worked example design approach

Any forthcoming development should seek to meet the following overarching design objectives:

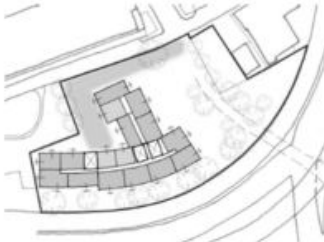
- Seek to retain where possible mature vegetation to site perimeter
- Maintain and if possible improve pedestrian route crossing the site
- Deliver a building height appropriate to context, however not competing with those buildings marking to junction, to maintain townscape legibility.
- Consider service routes crossing the site

- Ensure massing informed to retain views toward spires, as guided by Coventry City Council View Management SPD.

Site Layout



The layout of built form on site is heavily informed by the location of an existing pedestrian route and significant services crossing the site which will require clearance. Accommodating these two constraints resolves the site in proposing built form onto the Western portion of the allocation site only, however the remainder of the site could be utilised for amenity space and the improvement in environmental quality of the pedestrian link to Whitefriars Street.



Situating built form to the West of the application site also ensures spatial separation to Whitefriars Monastery to the East, whilst significant spatial separation remains to Whitefriars Gate to the West.

A built form response to the arc of the ring road to the south is suggested in this layout approach, however set back sufficiently to retain mature vegetation to site boundaries, a return leg of development then seeks to reconcile building lines of the Alison Gingell Building and deliver passive surveillance over pedestrian routes. Careful consideration of the suitability of residential space at ground level fronting the ring road should be given, where this space may be more suited to ancillary uses given the proximity of significant vehicle traffic.

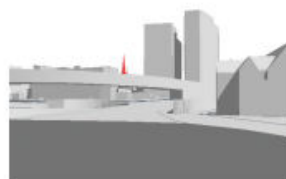
View cone assessment



The proposed allocation site sits aside view cones 6 and 7, as identified in the Coventry View Management Framework SPD, therefore massing on site should seek to ensure that views to the City spires are retained in order for a scheme to be policy compliant. In assessing the sites capacity, utilising 3D townscape modelling of the current context the following observations are made:

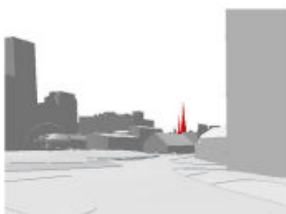
View Cone Six

Located to the top of the London Road the view corridor passes over the easternmost element of the proposed allocation site. and offers a glimpsed view toward the Cathedral spires, appearing aside the Alison Gingell Building within a built form 'gap' to Arundel House. This view corridor reinforces that built form should be located to the Westernmost element of the site to retain the availability of the view corridor.



View Cone Seven

This view corridor offers a distinct aspect toward St Michaels and Trinity spire, seen from the context of the Coventry technology Park. Located to the West of the site, the impact of built form should be limited in affecting this view corridor, and this is further reinforced in the context of planning consent being established within the foreground view at Paradise Street.



Massing Approach

Located in the context of a number of tall buildings at the head of an arterial route into the City, it is seen to be justified to anticipate a building of significant scale on site, however this scale and

massing should ensure that the legibility of massing in the wider junction remains and should therefore be subservient to a number of taller built forms in the area, given that the site is located within a graduation to gateway, rather than acting as a gateway site itself.

To the west of the application site the Severn Trent headquarters delivers an equivalent height of 8/9 storeys, whilst to the east Arundel House marks the junction visual focal point at seventeen storeys. Mediating between these two heights suggests a transitional height of 12-13 storeys may be appropriate on site, this is also noted to be equivalent to the intermediary stepping in heights of the 'Axo students' development to the South of the London Road junction.

Prevailing Massing Graduations



As noted in site analysis, the proposed allocation is located in the context of a number of buildings of significant status which mark the head of the arterial London Road approach to the Coventry ring road junction. In assessing the proposed massing in this context, the approach promotes a level of development which is subservient in height to established (and consented) tall buildings located around the junction. Given the proposed allocation site's secondary role in townscape when assessed in relation to developments located immediately to the junction, this approach is seen to strike a balance between recognition of the primary position of the site however responding appropriately to prevailing massing in this area of the City.

Development Quantum to inform allocation

To develop a worked example of development capacity on site, precedent has been taken from recently consented and/or delivered market residential development examples, including that of the Coventry City Centre South development. These example residential mix's provided a broad baseline of a 50/50 split of one and two bedroom apartments for City Centre development as an indicator of the current residential market demand in the City Centre. Whilst other residential models may also be able to be delivered on site, given the city centre residential market precedents and the need to ensure best use of sustainably located development land is made, an apartment based residential model is seen to both respond best to market precedents and the local townscape context for this proposed allocation site. Specific to this proposed allocation site, residential accommodation to the ground floor is proposed to be limited given the environmental quality constraint at low level aside the ring road. Ground floor accommodation is then restrained to the inner courtyard area, whilst a suggestion of communal uses is also made at ground level to bring additional activity to street level alongside the response to environmental site constraints.

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Allocation H2:32 – Dale Buildings, Tower Street

- Site Address – Tower Street, Coventry
- Site Area – approx. 0.37Ha
- Worked example basis – Market Apartments, NDSS standards inclusive, precedent mix.
- Assumed FFL to FFL = 3.2m
- City Centre Car Free Development example
- Apartment balcony private amenity space throughout + shared communal amenity space

The proposed allocation site is located to the north of the City Centre at a key arrival point into the City Centre where the Foleshill Road meets junction one of the Coventry Ring Road. The proposed allocation is located just outside of the Lady Herberts Garden and the Burges Conservation Area, which lies largely to the south of the proposed allocation site, however also immediately adjacent to the sites Eastern boundary. The site has several heritage designations in its immediate vicinity to consider, these including the Conservation Area, the grade II listed Lady Herberts Homes and boundary wall to the gardens, the registered park and garden and the scheduled monument of the city wall, inclusive of Cook Street gate which is located aside the proposed allocations sites easternmost corner. Structures on the site include a flat roofed three storey office building in a poor state of repair and several ancillary buildings, these existing structures are not seen to make a positive contribution to the character of the conservation area nor the setting of nearby individual heritage assets. The site has seen significant development within its context in the recent past, most notably phase one of the Bishopsgate development, this development being of three storey street level 'plinth' design with tower forms over of significant heights. A second phase of development of the Bishopsgate development is consented, developing to the East aside ringway St Nicholas, the proposed allocation is identified in the adopted City Centre Area Action Plan as being included within the Bishop Street Regeneration Area.

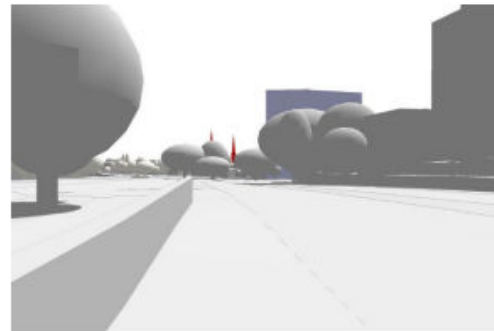


Viewcone assessment



Viewcone one of the Coventry View management framework passed over the application site on its eastern section, suggesting that a responsive design solution may be to locate taller elements to the West of the development site, and lower rise to the east in order to preserve views toward Holy Trinity and St Michaels spire when on approach to the City via the Foleshill Road.

In analysing the potential effect of development on the site in visibility of the spires from this viewpoint, reference has been drawn to the existing situation (shown below left) which shows the spires visible to view, however with lower elements concealed by structures in the foreground, the visibility of the spires does however remain, delivering positive legibility on approach to the City. Consideration has also been extended by utilising 3D modeling software upon which massing of the second phase of Bishopsgate is indicatively shown in blue (below right), similarly this shows retention of the spires to view beyond structures and with mature vegetation obscuring their visibility during the summer seasons.

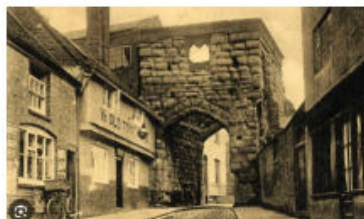


Disposition to Cook Street Gate and Medieval City Wall

As noted in the summary site description, the site is adjacent to the scheduled monument of the Coventry City Wall and Cook Street Gate, therefore any development of the site will need to ensure that this relationship is fully considered, and given the condition of the site there is seen to be opportunity to improve the setting of this important heritage asset.



The current situation shows built form close to the back of pavement of Cook Street with four storey development located close to the Gate itself. The Northern section aside the line of the City Wall is set to surface level car parking, providing a greater sense of space around this element. It is worth noting that the enclosure of Cook Street by built form has historic precedent as shown below, and this approach could be promoted in development of the site in respecting the historical development pattern which has been seen around Cook St Gate.



However there is also opportunity to seek to 'invert' the plan arrangement on site that is seen today, and deliver a greater space around the gate as a result, this approach would also be seen to offer the potential to soften the streetside and deliver greater areas of visible landscape on approach to the registered

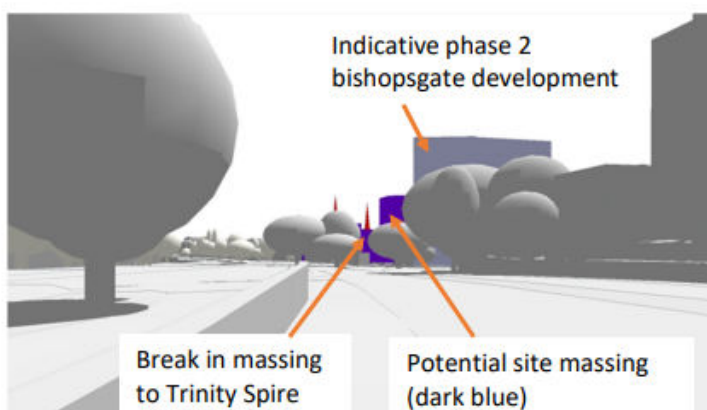
park and gardens of Lady Herberts Garden and the Grade II listed Lady Herberts Homes. Whilst matters of detailed design remain for discussion and agreement at later development management stages, the site assessment has investigated the approach of inversion of building footprint, further to identifying opportunities for multiple setting benefits to surrounding heritage assets and the creation of south facing landscaped spaces.

Worked Example



Placing the primary building footprint to Henry Street, the creation of South Facing courtyards would be possible, and therefore delivering upon the opportunity to introduce a landscaped context to Cook Street. Elements of built form approaching cook street may then define the boundaries of these spaces, whilst built form returning closest to Cook Street Gate could be limited to deliver a continuation of a landscaped street edge approaching the gate, providing an enhancement to the assets setting.

Should this plan arrangement be utilised, and additional separation to the Gate be provided, considerations of heights may then be primarily informed by view cone assessments and prevailing townscape context. As noted in analysis locating primary height to the Western element of the proposed allocation site would limit interface with the prescribed view cone, and indeed this visual impact may be significantly concealed should the second phase of the Bishops Gate development be undertaken.



Developing a responsive massing solution will be a key test on this site to ensure that proposals can both make best use of the site whilst respecting views and delivering enhancement to the setting of heritage assets. Whilst this will be a complex and challenging brief, testing massing approaches in 3D modelling shows that views should be able to be retained, and positive

spaces to Cook Street delivered. View cone testing suggested that a break in massing to maximise views toward Trinity spire may also be achievable, whilst heights comparable to the neighbouring Bishopsgate development *could* be acceptable if constrained to the Westernmost site area.

Applying a market precedent mix with emerging NDSS standards accounted for, view cone testing suggests that a development comprising 4 / 5 storey could be achieved to the eastern section of the site whilst to the west where heights are less constrained heights similar to that of the Bishopsgate development could be proposed. However, it is suggested that a mediated height between the precedents of Bishopgate and that of the eastern position of the site could yield the most successful townscape response, as such the taller element may then be proposed at circa 13 storey, with this approach then suggested to yield around 200 apartment units.

From: Eggington, Clare <Clare.Eggington@coventry.gov.uk>
Sent on: Monday, June 23, 2025 3:40:19 PM
To: Boden, Elizabeth <Elizabeth.Boden@HistoricEngland.org.uk>
CC: Styles, Chris <Chris.Styles@coventry.gov.uk>
Subject: RE: Draft notes of meeting and allocations assessment note
Attachments: Reg 19 CCC and HE Meeting Minutes 28 May 2025 final.pdf (74.43 KB)

Hi Liz

Apologies for the earlier (half finished) email where I pressed send before actually writing anything helpful! This is the correct version.

Thank you for the amendments to the minutes, I have made the changes and attached accordingly. In terms of the explanatory paragraph to H4 you are right its 11.14. WE have revisited this and agree it could do with some refinement and clarification. Could we propose the following wording to replace the current wording in the Reg 19 document.

11.14 In considering proposals for development and in line with para 11.13 above, the City Council's Validation Checklist will set out what is usually required including:

- a. An initial assessment establishing the archaeological significance of the site to be submitted*
- b. Where appropriate an archaeological investigation may be required.*
- c. Justification, together with appropriate mitigation before allowing any harm to or loss of the significance of a heritage asset.*

New para 11.15 Following archaeological investigation, where important archaeological remains are likely to be present, publication of results may be required prior to the grant of planning permission. Preservation in situ is usually the preferred approach.

Hopefully the above satisfies HE's requirement for publication prior to grant of permission but we have said "may be required" because there will be occasions where we can condition and gives us that flexibility.

We would be grateful for HE's feedback on this, and we will get the draft wording of the SoCG over to you as soon as we can.

Kind regards

Clare

From: Boden, Elizabeth <Elizabeth.Boden@HistoricEngland.org.uk>
Sent on: Tuesday, July 1, 2025 11:45:55 AM
To: Eggington, Clare <Clare.Eggington@coventry.gov.uk>
CC: Styles, Chris <Chris.Styles@coventry.gov.uk>
Subject: RE: Advice on SoCG please
Attachments: HE response Whitefriars Street Car Park 01072025.pdf (1.72 MB), HE response Dale Buildings 01072025.pdf (111.24 KB)

Hello Clare,

Thank-you for your recent email and for the assessment notes on the Whitefriars Car Park and the Dale Buildings, Tower Street sites.

Apologies for not getting back to you last week, but I have only picked up your message today, as I don't work Fridays and Mondays.

I have now had chance to discuss these with colleagues. Whilst the assessments include some analysis of views and consider the massing of the proposals in the context of other (built and consented) developments, which are helpful, we are disappointed that the sites have not been subject to detailed Heritage Impact Assessments, in order to inform the deliverability of the proposed allocations in accordance with national and local policy. As such our objections to these sites remain at this current time.

In our response to both your Local Plan Regulation 18 and 19 consultations we recommend utilising the 'site selection methodology' as set out on page 5 of our Historic England Advice Note 3 "*The Historic Environment and Site Allocations in Local Plans*": <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

I attach a note for each site, which sets out our position in more detail and may be helpful in undertaking this work.

In light of the above it may be prudent to consider our attached advice in relation to these sites, before drafting the SoCG?

In terms of your proposed changes to the wording of the supporting text to Policy HE4 (para.11.14), we would be supportive of a proposed modification as set out in your email of 23rd June 2025.

I understand that you are on leave this week, but please do get in touch if you would like to discuss matters further once you have returned to work.

Kind regards,
Liz

HE responses below to CCC's site assessments:

Proposed Allocation H2:30 – Whitefriars Street Car Park

Significance

The proposal is within the site of Whitefriars (Carmelite) monastery (c1342) and is likely to span the boundary between the inner and outer precincts of the monastery. Whitefriars gatehouse to the west is the main entrance (outer precinct gatehouse) to the monastic site.

Following dissolution, the site was open space as depicted on 18th century maps (see below).

In the early 19th century the site became developed for housing, initially on the old street frontages to the south of Whitefriars Lane and both sides of Whitefriars Street (now gone). These properties are likely to have had shallow foundations and good archaeological survival of the monastic site is expected where not impacted by the 19th century development.

The site was cleared after the Second World War and has been used as a car park since.

Whitefriars Gatehouse (Grade II*) and the East range of the cloister, Whitefriars Museum (Grade I) are the surviving standing remains of the Carmelite Priory and are both listed buildings. The archaeological remains below will contribute to the significance of these heritage assets and the understanding of the Carmelite Priory its layout, development and use following dissolution. Artefacts will inform our understanding of the daily life of the monastery.

Impact

Whilst some analysis has been undertaken by the Council in relation to View Cones and consideration given to the potential position of development on the site, no assessment has been undertaken to identify what impact the allocation might have on the significance of the above-mentioned heritage assets, including their setting.

The proposed allocation is for a 12-storey tower of residential development. This will require substantial foundations that are likely to remove a large proportion of below ground archaeological evidence within the footprint of the proposed building which occupies about 40% of the proposed allocation area.

The proposal will also necessitate stormwater attenuation that will require the excavation of a buried attenuation reservoir or an open swale. The depth of excavations required for these are likely to remove all archaeological remains. It is likely that this will require another 20% of the allocation area.

Service connections will also be required for telecommunications, electricity and foulwater that will also cause harm to buried archaeological remains.

It is expected that the proposed development would impact 60-70% of the area of the proposed allocation. This will result in a high level of harm to the archaeological remains present on the site and the contribution they make to the significance of the

designated heritage assets and the wider non-designated archaeology of the Carmelite monastery.

Policy

The proposal would need to satisfy local and national planning policy and the site lies within an Archaeological Constraint Area (Medieval city within and including the walls).

Development of the site would need to meet policy HE2 (Conservation and Heritage Assets) of the adopted Coventry Local Plan (2011-2031). This sets out that:

1. Development proposals will be supported where they conserve the historic environment recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance (the list includes Listed Buildings and archaeological sites)
2. Demonstrate an understanding of significance
3. Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail
6. Destruction of heritage assets will be resisted and where permitted will need substantial justification
7. All proposals should aim to sustain and reinforce the special character and conserve distinctive historic elements of Coventry, including surviving buildings of the medieval city and archaeological remains of all periods.

The site is included in the Coventry City Centre Area Action Plan under policies CC11 and CC14. Policy CC11 (Accessibility) sets out the Council's vision for access provision including car parks. The use of multi-storey car parks that free up land for other uses to make the centre more attractive and for a wider offer for visitors is noted in paragraph 16.42.

Under CC11(e) Whitefriars car park is listed with redevelopment, intensification and enhancement being encouraged as part of the wider regeneration of the city centre with policy CC14 referred to for the Civic Area (however the site lies outside the defined Civic Area in the plan).

CC14 sets out that new development must respect and enhance the setting of the areas heritage assets (b).

Historic England's Position

Delivery of this proposed allocation is likely to cause a high degree of harm to the setting of the Grade I and Grade II* listed buildings and to the non-designated archaeological remains that contribute to the understanding and significance of the medieval Carmelite monastery and its designated heritage assets.

The site has not been subject to sufficient heritage assessment to inform whether the level of development sought could be achieved whilst minimising harm to the historic environment. The deliverability of the proposed allocation in accordance with national and local policy has not been demonstrated.

Due to recognised archaeological sensitivity of the location and its contribution to the significance of the adjacent designated heritage assets, the understanding of the

Carmelite monastery and the contribution to the rich medieval heritage of Coventry, we advise that a greater understanding of the archaeological potential is required to inform the suitability of this allocation.

As a minimum we would advise the use of Ground Penetrating Radar to assess survival of the monastic buildings and features with supporting archaeological evaluation.

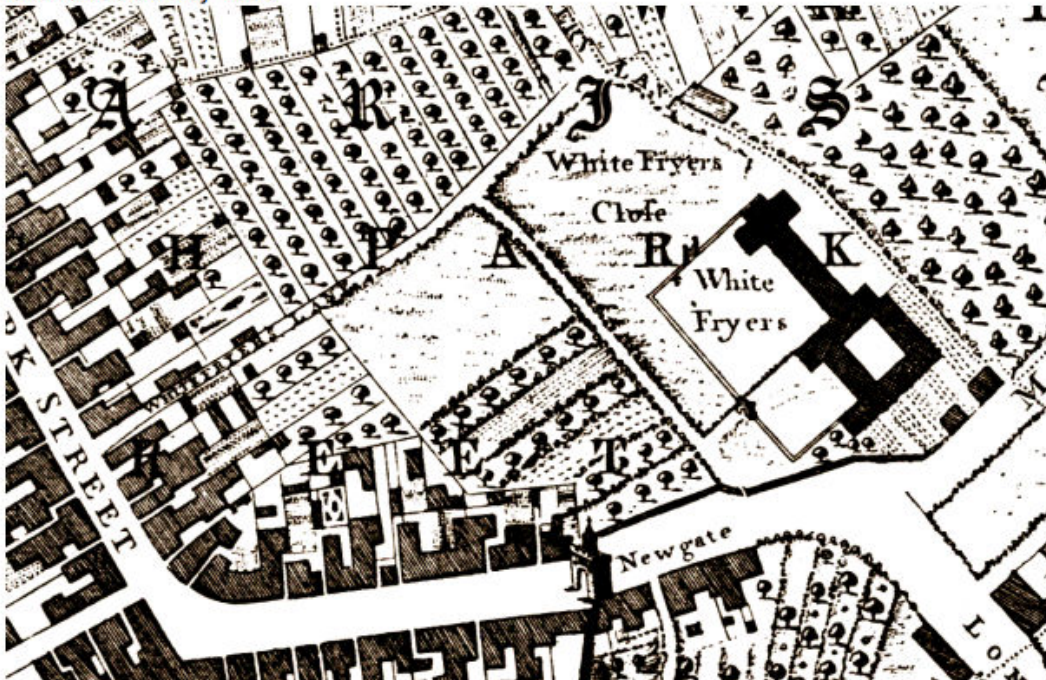
If no detailed heritage assessment/evaluation is undertaken, then we advise that the allocation is unsound and should be removed from the Local Plan. We suggest that alternative options for re-use of the area such as greenspace for the university connecting the visible heritage assets of the Carmelite monastery could be explored.



Proposal site on modern map base



Ordnance Survey 1886



Samual Bradford's Plan 1749 (Allocation proposal is mainly in the field with the 'A' of park in it, but also extends to the east of the road)



1930 Aerofilms image with the proposal site in mid-left of image



Vertical image of the proposal site in 1947

Proposed Allocation H2:32 – Dale Street Buildings, Tower Street

Significance

The proposed site allocation is located in the Northern part of central Coventry and within the medieval city walls. The site is bounded by Cook Street to the south and is in close proximity to the C14 Cook Street Gate and the associated stretch of city wall still standing.

Part of the C14 city wall, a Scheduled Monument, is located directly adjacent to the south east of the site and includes Cook Street Gate to the north with Swanswell Gate to the south, which are both Grade I listed buildings. The curve of the city wall is emphasised by the hard and soft landscaping of Lady Herbert's Garden, developed in the 1930's by leading local industrialist Alfred Herbert. The garden includes two sets of charming almshouses which are Grade II listed, and the importance of the gardens is recognised through its Registered Park and Garden (Grade II) designation.

The medieval city walls would have provided a strong presence in their day, and the Lady Herbert's Garden and Burges Conservation Area to the east and south of the site includes key elements of Coventry's surviving historic townscape, including a section of city wall and buildings at The Burges, Parker Lane and Hales Street.

The application site consists of post-war buildings; much of the surrounding area having been lost during World War II. Whilst, remodelling of the city had begun as early as 1938, more modern approaches to redevelopment were undertaken post-war in the city from 1948 onwards. However, this edge of centre area of Coventry continued as lower scale development comprising a mix of light industrial and residential uses.

The significance of the site lies in its connection with the surrounding heritage assets, including the Scheduled Monument, the Listed buildings, Registered Park and Garden and the Conservation Area.

There are clear views south into the centre of the city towards church spires, which form a key part of Coventry's skyline, as well as other heritage assets. These include the Ruined Cathedral of St Michael (Grade I), the 1950's Cathedral of St Michael (Grade I), Holy Trinity Church (Grade I), and remains of the Priory (Grade I).

Impact

Whilst some analysis has been undertaken by the Council in relation to the relevant view cone and consideration given to the potential position of development on the site, no detailed assessment has been undertaken to identify what impact the allocation might have on the significance of the above-mentioned heritage assets, including their setting.

The proposed allocation is for a 200 residential apartment scheme comprised of a 13-storey tower block on the western part of the site and residential development of around 4/5 storeys in the eastern section of the site.

Notwithstanding the information contained in the Council's site assessment, it is evident from the visuals presented that the scale and massing of the proposed development would have a harmful impact on the significance of several heritage

assets through development in their settings.

This is most apparent from the City Wall and associated gates as well as Lady Herbert's Garden. The proposal would appear overbearing in scale to the designated heritage assets and would disrupt the strong sense of enclosure and historic boundary to the city that characterises the area at present.

The proposed allocation is located especially close to the Scheduled Gatehouse and city wall and the proposal should respect the height of the city wall on the elevation fronting it (east elevation). In addition, archaeological evaluation is needed to demonstrate a full and accurate understanding of the alignment of the city wall and its features, including the towers.

Development of the proposed allocation, in the form of the worked example shown, would not respond appropriately to site conditions, local area context or heritage assets, due to overbearing scale and massing. In particular, we are concerned about the potential harmful effects a building of 13 storeys would have on Lady Herbert's Garden and the Burges Conservation Area, and upon the significance of the Grade I and Scheduled city wall; including both City Gate and Swanswell Gate.

Despite there being other taller buildings in the vicinity of this site, these are largely located on the other side of Tower Street where they can be read as part of the city centre cluster of tall buildings.

In the form and quantum presented, the proposed allocation would result in a bulky, taller building than that currently in place, which would further remove itself from that human scale development which characterises the part of the city in which it sits and would harm the significance of the listed buildings, scheduled tower and wall and other heritage assets.

Furthermore, the proposal would appear to be at odds with the intentions of the City Council's Three Spires SPD and would have the potential to harm the significance of the highly graded churches as a result of setting impacts. The site is located partially within View Cone One of the Three Spires SPD. We note the intention to locate the tall 13 storey building in the western portion of the site, just outside of View Cone One, which passes over the eastern section of the site. However, there will still be the interruption of views of the three spires, with the tall building having a harmful impact upon these established views of the three spires and their landmark status.

Policy

The proposed allocation would need to satisfy local and national planning policy and the site lies within an Archaeological Constraint Area (Medieval city within and including the walls).

Development of the site would need to meet policy HE2 (Conservation and Heritage Assets) of the adopted Coventry Local Plan (2011-2031). This sets out that:

1. Development proposals will be supported where they conserve the historic environment recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance (the list includes

- Listed Buildings, Conservation Areas, Scheduled Monuments, archaeological sites and Registered Parks and Gardens)
2. Demonstrate an understanding of significance
 3. Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail
 6. Destruction of heritage assets will be resisted and where permitted will need substantial justification
 7. All proposals should aim to sustain and reinforce the special character and conserve distinctive historic elements of Coventry, including surviving buildings of the medieval city and archaeological remains of all periods.

The site is included in the Coventry City Centre Area Action Plan (CCAAP) December 2017; specifically Policy CC2: (Enhancement of Heritage Assets) and Policy CC3: (Building Design) are of relevance.

Furthermore, we refer to the *Tall Buildings Design Guide & Three Spires View Management Framework SPD* which outlines areas in the city centre where development areas are highlighted to have a likely greater impact upon the setting of the Three Spires and this site is included in the framework.

Historic England's Position

Delivery of this proposed allocation at the quantum of development proposed is likely to cause a high degree of harm to the setting of various, highly graded designated heritage assets, raising a number of serious concerns.

The site has not been subject to sufficient heritage assessment to inform whether the level of development sought could be achieved whilst minimising harm to the historic environment. The deliverability of the proposed allocation in accordance with national and local policy has not been demonstrated.

In order that the Local Plan be found sound, we suggest that prior to allocation a detailed Heritage Impact Assessment is undertaken for this site, and that serious consideration be given to reducing the height, scale and massing of the development, such that the quantum of development sought is significantly decreased in order to minimise harm to the significance of the listed buildings, scheduled tower and wall and other heritage assets.

Hi Liz

Further to recent discussions and the feedback from HE regarding the initial assessment work on the two objection sites (Whitefriars and Dale Buildings), I can confirm that we are undertaking HIAs for those two sites as recommended.

However in terms of the archaeological investigation works for Whitefriars, we remain of the view that an investigation of this nature and scale is disproportionate in terms of plan preparation and would be more appropriately applied in relation to the preparation of a detailed planning application. We believe that such investigative work should be included as a requirement cited in the site-specific allocation policy wording, to be undertaken as part of the application preparation process. Noting HE's concerns, we are therefore proposing to insert the following within Table 6.2 under 'Essential Site Specific Requirements:

'Given the allocation site's high archaeological potential, development design proposals must be informed by, and responsive to, preliminary archaeological site investigation'.

Please see attached a revised SoCG for your review, which reflects the above points and also picks up the other aspects of the representations made.

We appreciate that the SoCG will need to be updated as works progress but I hope we will be in a position to get this initial version signed at HE's earliest convenience to help demonstrate that the DTC is being actively and constructively fulfilled

Just on timelines, we hope to be submitting early September (subject to authority to do so from Cabinet (26th August) and Council (2nd September) so it would be helpful to understand HE's indicative timelines too

Kind regards

Clare

Clare Eggington
Planning Policy Manager

From: Boden, Elizabeth <Elizabeth.Boden@HistoricEngland.org.uk>

Sent: 12 August 2025 16:25

To: Eggington, Clare <Clare.Eggington@coventry.gov.uk>

Cc: Viciana Martinez, Maria <Maria.VicianaMartinez@HistoricEngland.org.uk>; Rimmington, Neil <Neil.Rimmington@HistoricEngland.org.uk>; Styles, Chris <chris.styles@coventry.gov.uk>

Subject: RE: Coventry CC draft SoCG

Hi Clare,

Thanks for your email and attached draft SoCG.

We are pleased that the Council will be undertaking HIAs for the Whitefriars Car Park and Dale Buildings sites and we intend to provide comments on the proposed approach and wording in relation to Whitefriars as part of our response on the SoCG.

With regard to timescales, we are mindful of your intention to submit the Plan in early September and due to myself and Maria taking leave in the last week of August, we will endeavour to respond on the SoCG by 25th August latest and hope that will be acceptable?

Would a tracked changed version of the SoCG be the best way of handling any wording changes that we may recommend?

Kind regards,
Liz

Appendix 8 Office for Road and Rail

From: Eggington, Clare
Sent: 22 January 2025 11:19
To: contact.pct@orr.gov.uk <contact.pct@orr.gov.uk>
Subject: Coventry Local Plan Regulation 19 Duty to Co-operate

Good morning

As you will be aware, Coventry City Council launched its Regulation 19 Plan on Monday 20th January for a six week consultation period running until Monday 3rd March 2025 <https://www.coventry.gov.uk/localplanreview>

As a Prescribed body under the Duty to Co-operate we would wish to understand whether you have any issues with the proposals in the plan review and would like to request a discussion and if necessary prepare a Statement of Common Ground

Previously we have been advised that the ORR would defer such discussions to more localised organisations ie Network Rail, National Highways and in the West Midlands, Transport for West Midlands.

However, Network rail have emailed me to advise that they are not a prescribed body, and as such I am requesting further directions from yourselves as to how we should proceed under the DtC

I look forward to hearing from you

Kind regards

Clare Eggington
Planning Policy Manager
City Services
Coventry City Council
02476 972751
[coventry.gov.uk](https://www.coventry.gov.uk)

Fw: Coventry Local Plan Duty to Co-operate



Eggington, Clare
To: contact.pct@orr.gov.uk

[Reply](#) [Reply All](#) [Forward](#) [Share](#) [More](#)

Thu 07/08/2025 11:13

Good morning

The Coventry Local Plan Review is due to be submitted shortly to the Planning Inspectorate for examination in public, submission is anticipated to be early September 2025.

The ORR has been consulted at all stages of the plan review but has made no response. As per the below email trail we have been liaising with Network Rail, National Highways and TfWM

However as a Duty to Co-operate body, in order to assist us further in showing that we have complied with the DtC it would be helpful for us to have on record that the ORR have no issues they wish to raise directly with us as part of the review. If someone could confirm this within the next couple of weeks (ie by 21st August) that would be appreciated.

Kind regards

Clare Eggington
Planning Policy Manager
Regeneration and Economy
Coventry City Council
02476 972751
[coventry.gov.uk](https://www.coventry.gov.uk)

FW: Coventry Local Plan Duty to Co-operate



Eggington, Clare

To Haigh, Rob



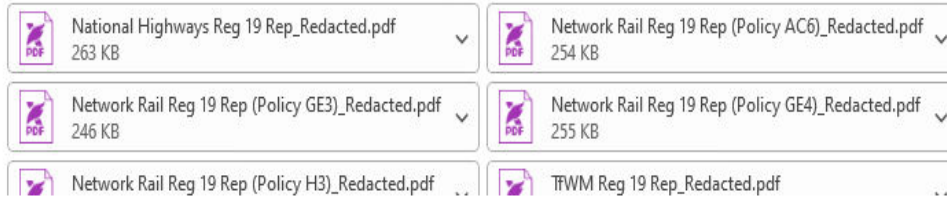
Reply

Reply All

Forward



Thu 14/08/2025 17:50



Good morning Clare

Thank you for your email. As you will already know, ORR is a prescribed body in relation to the duty to cooperate set out in the Localism Act 2011.

Unfortunately, we receive a high volume of emails relating to Local Plans, many which do not relate to the rail transport industry. Therefore, we ask that where consultation is required under Section 110 of the Localism Act 2011, **that the local authority provide specific questions set out in a covering email to us which references the relevant part(s) of the documentation.**

There was no email thread attached as mentioned. It would be helpful if you could forward to us any responses received from Network Rail, TfWM and National Highways with regards to the local plan.

Further information can be found on our website: [Planning application enquiries | Office of Rail and Road](#)

Kind regards



Layla Beckett
Public Correspondence Manager
T: 07566 766369
layla.beckett@orr.gov.uk
Piccadilly Gate, Manchester, M1 2WD
orr.gov.uk | Follow us [@railandroad](https://twitter.com/railandroad)

FW: Coventry Local Plan Duty to Co-operate



Eggington, Clare

To Haigh, Rob

Reply Reply All Forward

Thu 14/08/2025 17:50

National Highways Reg 19 Rep_Redacted.pdf 263 KB	Network Rail Reg 19 Rep (Policy AC6)_Redacted.pdf 254 KB
Network Rail Reg 19 Rep (Policy GE3)_Redacted.pdf 246 KB	Network Rail Reg 19 Rep (Policy GE4)_Redacted.pdf 255 KB
Network Rail Reg 19 Rep (Policy H3)_Redacted.pdf ..	TfWM Reg 19 Rep_Redacted.pdf ..

From: Eggington, Clare <Clare.Eggington@coventry.gov.uk>

Sent: 14 August 2025 17:49

To: PCT Contact <contact.cct@orr.gov.uk>

Cc: Pipe, David <David.Pipe@coventry.gov.uk>; Benison, Neil <Neil.Benison@coventry.gov.uk>; Taylor, Daniel <Daniel.Taylor@coventry.gov.uk>

Subject: RE: Coventry Local Plan Duty to Co-operate

Good afternoon and thank you for your response. When I referred to the email trail I meant the correspondence forwarded if you scroll down (email of 22/01/25) rather than any attachment. Apologies for any confusion.

I attach the representations from Network Rail, National Highways and TfWM.

In regard to the former we have agreed with Network Rail that we have addressed the issues they raised and they have confirmed there are no significant strategic issues or large scale developments that will interface with NR and a Statement of Common Ground is not necessary. In terms of National Highways the key issue which is ongoing relates to transport modelling, as a result of further updated modelling currently being undertaken. A report on the modelling is due in September and we hope to be able to resolve any outstanding issues at that point with National Highways. TfWM discussions have also been taking place and they have confirmed that there is no need for a SoCG and that the plan reflects their emerging LTP.

Should you wish for any further information please do let me know. Just so you are aware, our Plan Review is being taken to Cabinet on 26th August and Council on 2nd September and subject to authority to proceed we aim to submit early September.

Kind regards

Clare Eggington

Planning Policy Manager

Regeneration and Economy

Coventry City Council

02476 972751

coventry.gov.uk

Coventry City Council Local Plan Review: Regulation 19 Duty to Co-operate with Network Rail

Date: 17th June 2025

Venue: Meeting conducted via Teams

Attendees

Richard Brown	CBRE
Michael Gradwell	Network Rail
Clare Eggington	Coventry City Council Planning Policy
Daniel Taylor	Coventry City Council Planning Policy
Rosie Coyle	Coventry City Council Highways

Minutes

AGENDA ITEMS		
1	<u>Update on the Local Plan Review - CCC</u>	
	CE – gave a high-level overview of the where the Local Plan Review is currently at and the anticipated forward timeline for submission.	
2	<u>Network Rail Representations at Regulation 19</u>	
	SUMMARY OF NETWORK RAIL'S REPRESENTATIONS	MEETING DISCUSSION ON THE REPRESENTATIONS
H3	<ul style="list-style-type: none"> Network Rail should be referenced under criterion 3 relating to existing businesses not having unreasonable restrictions placed on them because of new residential development (agent of change). Reference for appropriate Asset Protection Agreements to be entered into should be included. 	<p>RB – The requests do not need to go into policy, but reference made to Network Rail somewhere in terms of the agent of change and reference to Asset Protection is sought.</p> <p>CE – Reference could be made in the explanatory text of policy AC6.</p> <p>In terms of the operation railway, there are already statutory provisions in place and these can be taken account of and circumstances considered on a case-by-case basis, so not necessarily needed to be repeated in planning policy.</p>
A6	<ul style="list-style-type: none"> Reference to the West Midlands Strategic Advice 2022 and relevant emerging local studies should be made in criterion 2. Policy should state the projects listed in criterion 2 are not exhaustive; are subject to change; and that other priorities may arise. 	CE – Reference to the additional guidance and clarification that the project list is not exhaustive could be included.
GE3	<ul style="list-style-type: none"> Should be stated in the policy that there may be circumstances where 	RB – Seeking something like the exception for trees in policy GE4.

	<p>rail maintenance and improvement proposals will be exceptionally permitted where the strategic benefits of the proposal clearly outweigh protection of nature conservation resources.</p>	<p>CE – Examples of wording used by other authorities would be useful to see. RB – We do not have example wording, but similar representations have been made to other authorities' local plan consultations. CE – We will take your proposed amendment away and discuss.</p>
GE4	<ul style="list-style-type: none"> Clarity should be provided to supporting text paragraph 9.28 (exceptional circumstances where the protection of trees could be superseded) through specific reference made to operational and rail safety considerations as circumstances that would fall under criterion 1a of the policy. 	<p>CE – We will take your proposed amendment away and discuss.</p> <p>In terms of the operation railway, there are already statutory provisions in place and these can be taken account of and circumstances considered on a case-by-case basis, so not necessarily needed to be repeated in planning policy.</p>
IM1	<ul style="list-style-type: none"> Network Rail supports the provision / contributions for associated necessary infrastructure from development. 	<p>CE – Support is noted.</p>
3	<p><u>Duty to Cooperate and Statement of Common Ground</u></p> <p>MG – In terms of who is the DtC body, the Office of Rail and Road (ORR) is the prescribed body listed in the planning regulations and therefore there isn't a statutory duty to cooperate from Network Rail.</p> <p>CE advised that the ORR's response to the Council was that the Council should pursue direct engagement with Network Rail and National Highways.</p> <p>MG – it is in NR's interest to engage with the Council on strategic matters of policy development and NR is happy in principle to sign a SoCG.</p> <p>MG – will discuss with colleagues about how to address the ORR and DtC issue and whether this has been raised before.</p>	
4	<p>AOB</p> <p>N/A</p>	

CCC Responses to Network Rail Reps - Regulation 19

Policy	Summary of Network Rail's Representations	CCC Response	CCC Explanation
H3 Provision of new housing	<ul style="list-style-type: none"> The policy or the supporting text should state that businesses referenced under Criterion 3 (existing businesses not having unreasonable restrictions placed on them because of new residential development) includes bodies such as Network Rail. Developments should not restrict existing or likely future operational rail requirements in line with the 'agent of change' principle established in the NPPF. The plan should refer to the need for appropriate Asset Protection Agreements to be entered into to protect railway infrastructure as part of future development. 	NO MODIFICATION NECESSARY	The Council does not consider it is necessary to include additional wording as there are already statutory provisions in place for rail and where appropriate these would be taken account of. There is not considered a need to repeat this in planning policy and where Network Rail proposals require planning permission from the LPA these will be considered on a case-by-case basis.
AC6 Rail	<ul style="list-style-type: none"> Reference to the West Midlands Strategic Advice 2022 and relevant emerging local studies should be made in criterion 2. 	POTENTIAL MODIFICATION	Reference to this additional guidance will be inserted given other guidance is mentioned and Coventry Highways has approved its inclusion.
	<ul style="list-style-type: none"> Projects listed are not exhaustive and it should be stated in policy that projects listed may be subject to change in the future and other priorities may arise over the plan period. 	POTENTIAL MODIFICATION	Wording will be inserted that says priorities may change in the future and therefore the list of initiatives is not exhaustive.
GE3 Biodiversity, Geological, Landscape and Archaeological Conservation	<ul style="list-style-type: none"> Should be stated in the policy that there may be circumstances where rail maintenance and improvement proposals will be exceptionally permitted 	NO MODIFICATION NECESSARY	The Council does not consider it is necessary to include additional wording as there are already statutory provisions in

	<p>where the strategic benefits of the proposal clearly outweigh protection of nature conservation resources. (Similar to the exception for trees in policy GE4).</p>		<p>place for rail and where appropriate these would be taken account of. Where Network Rail proposals require planning permission from the LPA, these will be considered on a case-by-case basis.</p> <p>It should be noted that the exceptional circumstances in policy GE4 for the loss of protected trees still requires development to provide adequate compensatory provision. Therefore, Policy GE3 will retain this consistent position.</p>
	<ul style="list-style-type: none"> It is not always safe or practical to avoid all impacts on existing biodiversity features as part of the balance between biodiversity objectives and the ability to maintain and improve the railway to keep it running safely and smoothly. In situations where certain on-site impacts are unavoidable, Network Rail will seek to create appropriate habitats elsewhere, (in the local area where possible), to mitigate for and offset any impacts, also having regard to national legislative requirements. 	NO MODIFICATION NECESSARY	Comment noted.
GE4 Tree Protection	<ul style="list-style-type: none"> Network Rail is supportive of the supporting text in paragraph 9.28 which states there may be exceptional circumstances 	NO MODIFICATION NECESSARY	The sentence in the supporting text of policy GE4 which states: <i>"In exceptional circumstances where</i>

	<p>where the benefits of development are considered to outweigh the benefit of preserving protected trees. To provide clarity to this, specific reference should be made to operational and rail safety considerations as circumstances that would fall under criterion 1a of the policy (which identifies that development will be positively considered provided there is no reasonably unavoidable loss of, or damage to, existing trees or woodlands during or because of development).</p>		<p><i>the benefits of development are considered to outweigh the benefit of preserving protected trees"</i> continues on to say: <i>"development will be permitted subject to adequate compensatory provision being made."</i></p> <p>There is therefore a requirement for all developments to mitigate the impact of the loss of protected trees and the Council does not consider it is necessary to include additional wording as there are already statutory provisions in place for rail and where Network Rail proposals require planning permission from the LPA, these will be considered on a case-by-case basis consistent with other developments.</p>
<p>IM1 Developer Contributions for Infrastructure</p>	<ul style="list-style-type: none"> • Network Rail supports this policy that states developments should make provision for associated necessary infrastructure as contributions from development will be an important aspect to ensuring the delivery of the new and improved rail infrastructure needed. 	<p>NO MODIFICATION NECESSARY</p>	<p>Comment noted.</p>

From: Michael Gradwell <Michael.Gradwell@networkrail.co.uk>
Sent: 09 July 2025 11:04
To: Taylor, Daniel; Brown, Richard @ Birmingham
Cc: Eggington, Clare
Subject: RE: Coventry Local Plan Review - DtC catch up meeting

OFFICIAL

Hi Dan,

Thanks for your commentary on the potential mods requested by NR. I've reviewed and can confirm agreement to all of the responses. As there aren't any significant strategic issues or large scale developments that will interface with NR, I don't think we need to consider a SoCG at this moment?

Kind regards,



Michael Gradwell
Town Planning Manager
Network Rail Property (NW&C)
Square One, 4 Travis Street, Manchester, M1 2NY
07801907275

Appendix 9 Transport for West Midlands

Local Plan Review Regulation 19 Duty to Co-operate Meeting – CCC and TfWM

30/01/2025, 11am, via Teams

Attendees

Clare Eggington	Planning Policy Manager, CCC
Dan Taylor	Planning Policy, CCC
Chris Berry	Planning Policy, CCC
Jasmine Couchman	Planning Policy, CCC
David Pipe	Transport Strategy, CCC
Gurdip Nagra	Planning and Land use, WMCA
Leo Pollack	Head of Policy and Planning at WMCA

Minutes

1.	Introductions
2.	Overview on the Regulation 19 Local Plan CE gave an update on the Regulation 19 publication, including the employment land shortfall.
3. 4.	Approach to transport through the Local Plan and TfWM Key Update The following matters were discussed: TfWM - Ensure WCC highways are engaged: CCC confirmed ongoing discussions with partner bodies. TfWM explained that the Local Transport Plan is currently being developed and Local Plan policies should accord with that & under the LTP will be the Coventry Area Action Plan. CCC confirmed their adopted transport strategy has taken account of the emerging LTP, and Local Plan policy formulated accordingly. TfWM - Local Plan should include infrastructure detail – CCC confirmed this is in the Infrastructure Delivery Plan (IDP) in the appendices. TfWM - Allocations and growth sites in the city should align with the site-specific schemes and City Regional Sustainable Transport Settlements (CRST). – CCC confirmed funding and CRST schemes have been included in the modelling.

	<p>TfWM queried – does the plan intend to include accessibility standards i.e. distances to bus stops, amenities, etc? This was in the adopted plan but approach has been changed in line with ‘liveable neighbourhoods’.</p> <p>There was a discussion around the transitional arrangements and CCC explained the rationale for proceeding under the 2023 NPPF.</p> <p>There was a discussion around the employment land shortfall and how CCC was addressing this.</p> <p>There was a discussion around broader Planning and Local Government reform.</p>
--	---

5.	<p>Developing the Statement of Common Ground: Scope, process, governance</p> <p>TfWM felt that in terms of the draft framework for a SoCG, there is nothing in it that isn’t picked up elsewhere but happy to do one if it helps the local plan process.</p> <p>CCC advised they would be happy to review the need for a SoCG following review of the reps.</p>
6.	<p>AOB</p> <p>N/A</p>

Appendix 10 National Highways



Minutes Planning Policy

Time and Date: 25th March 2025

Venue: Teams

Meeting between Coventry City Council and National Highways

Present:

Clare Eggington (CCC Planning Policy)
David Pipe (CCC Transport)
Chris Berry (CCC Planning Policy)
Patrick Thomas (National Highways (NH))
Jennifer Searle (Aecom, for National Highways)

Purpose of meeting: to discuss National Highways representation to the Regulation 19 Local Plan and ensure outstanding issues are resolved.

1. Reference to the MoU – a copy of this was requested as most staff at both CCC and NH only came into post more recently since the date this was produced.
2. DP explained that CASM had now been replaced by CSMT. The latter was not ready in time for the Plan Review timetable but it is broadly similar to CASM, with the same geographical area. It has a base year of 2023 and a forecast year to 2041. CSMT also has additional functionality for public transport including VLR whereas CASM is more focused upon highways.
3. It was agreed that NH has always been involved in the build of CASM, and PT confirmed he was reassured that this was now being replaced. He advised he would want to review the base year and forecast year and that any further modelling would be in CSMT. DP wanted to understand what engagement NH requires. PT said the methodology would be commented on by the modellers at Aecom.
4. DP agreed to send NH the LNVR and forecast reports asap. PT advised he was hopeful that this information would demonstrate broad suitability in regard to the issues raised and he would feed back if anything further is needed, bearing in mind the tight timescales for the plan review process which were outlined.
5. DP confirmed that Walsgrave Junction had been included in the CSMT baseline.
6. PT confirmed that NH had applied for a DCO in the last few days.
7. In terms of infrastructure planning all agreed the updated information from NH was very helpful and would be included in an updated IDP. PT requested further information on infrastructure funding gaps if it was possible to ascertain this.
8. In terms of the M6 J3 Neil Benison would be asked to provide an update.

9. In terms of blue light access to Walsgrave Hospital, the new roundabout would provide an 'arm' as part of the Walsgrave Junction improvements to enable this to be delivered at a later date if required. It is understood that the project manager for Walsgrave (Ben Marchant) has had discussions with the developers (SEGRO)
10. There was a discussion on key employment sites and CCC confirmed that the identification of these was through the Employment Land Review and this was about giving these sites additional protections as employment uses, not allocating new employment land.
11. PT advised that NH were looking at cumulative impacts of development relating to the M6 J2 and broader implications between the M6 J2 and J3 but at present have nothing committed - the DCO is the only committed scheme in the programme. DP confirmed that the modelling for CSMT picks up the two NH schemes in the 2041 modelling – the A46 Binley, and the A46 Walsgrave. There was a discussion around Project Alpha (in Rugby) but as this is called in its status is yet to be confirmed and as such this has not been modelled but consideration would need to be given to the matter and how to address.
12. It was agreed that if NH were content with the updated evidence an SoCG may not be needed, and NH / Aecom would review the information supplied by CCC and discuss further if needed.

Appendix 11 Coventry City Council and Warwickshire County Council Highways Teams



Coventry City Council

Minutes

12:30

Online via Teams

Attendees:

Clare Eggington	Coventry City Council Planning Policy Manager
Dan Taylor	Coventry City Council Planning Policy Officer
David Pipe	Coventry City Council Transport Strategy
Alan Law	WCC Service Manager
Seb Burch	WCC Strategy Manager Transport Planning
Adrian Hart	WCC Strategic Transport Lead

Introduction from CCC

- As part of its Local Plan review, CCC has also held Duty to Cooperate meetings with Network Rail, TfWM and National Highways and has contacted the ORR.
- The ORR has in the last week provided comments that the Council will formulate a response to.

CCC transport modelling update

- The Local Plan evidence base and the Regulation 19 submission used modelling carried out under the Coventry Area Strategic Model (CASM). This compared expected future traffic volumes across the city based on delivery of the existing Local Plan, with those based on the proposed revised Local Plan.
- CCC is currently re-running the CASM modelling using its new modelling platform – the Coventry Strategic Modelling Tool (CSMT). CSMT is broadly similar to

CASM, in terms of its coverage and functionality, but has been built using new data, collected after the pandemic. This ensures that it more accurately reflects the latest travel trends.

- CSMT has a 'base year' of 2023 and a 'forecast year' of 2041. The 2041 forecast year includes current and planned development sites in Coventry and in neighbouring authority areas. Committed infrastructure, like the A46 Walsgrave Junction improvements, has also been included.
- CVLR has not been included as currently only the demo project is fully committed.
- The results of the CSMT modelling will be released in September 2025.
- Project Alpha (Fraser Group's new Headquarters in Ansty in Rugby Borough Council's administrative area, but on Coventry's border) was not part of the modelling at Regulation 19 as there was insufficient certainty it would come forward. However, it is now being included in the CSMT modelling as an additional 'sensitivity test' (i.e. results will be presented with and without Project Alpha), as it is considered that it would have a significant impact on the transport network.

WCC considerations

- WCC advised that the A444 and M6 junction is a priority and they are factoring in the potential new link road, new railway station and possible CVLR connections to the area around Warwick University.
- This feeds into the South Warwickshire Local Plan that WCC are reviewing along with the Kenilworth Road corridor and NOKSOC area.
- The A45 and Kenilworth Road junction was also discussed. While not part of the Local Plan modelling, CCC are separately developing plans for a segregated cycleway through the junction and along Kenilworth Road. It is likely that separate, local junction modelling, will be carried out as part of the development of these plans.

Further meetings

- A further meeting will be arranged once the new CSMT modelling results are ready.

AOB

- CCC will organise with WCC Highways to attend CSWAPO in the Autumn to provide an update on their transport strategy.

Appendix 12 NHS / Coventry and Warwickshire NHS Integrated Care Board



Coventry City Council

Minutes

Local Plan Review – NHS Property Services

28th July 2025
14:00

Online via Teams

Attendees:

Clare Eggington	Coventry City Council Planning Policy Manager
Chris Berry	Coventry City Council Planning Policy Officer
Dan Taylor	Coventry City Council Planning Policy Officer
Andrew Stirling	NHSPS Senior Strategy Manager
Hyacynth Cabiles	NHSPS Town Planner

Local Plan Regulation 19 Representations

- It was confirmed that the scope of this meeting was specifically to focus upon the representations from NHS Property Services (NHSPS). AS confirmed that he would co-ordinate a separate meeting with Simon Doble, Deputy Director of Primary Care at the ICB regarding their role as lead NHS body for the Duty to Co-operate.

Policy CO2

- HC advised that the representations made were to reflect the concern from the NHS that the revised policy may not take account of NHS internal processes when it comes to determining need for services in a local area, with the wording of points 1a-c of policy CO2 being of particular concern.
- CE advised that it is a challenge for policy to cater for the requirements of different sectors and services, but it does allow for justification to be considered at the planning application stage including taking account of the

ICB infrastructure strategy and estates planning. The Council and the ICB (including the Local Estates Forum (LEF)) already work closely together regarding infrastructure provision and this process works well.

- It was agreed that the updated Infrastructure Delivery Plan (IDP) will take account of the ICB Infrastructure Strategy and that additional explanatory text to the policy chapter could be added to better acknowledge ICB processes and how this links to the IDP.

Policy IM1

- In terms of securing and delivering health infrastructure, it was agreed that the existing S106 process provides a sufficient mechanism for securing contributions for health and care services where a need can be demonstrated in compliance with the relevant legal tests. Engagement with the ICB and the Local Estates Forum (LEF) regularly takes place to determine delivery in line with the relevant Infrastructure Delivery Strategies and NHS Estates plan.
- It was agreed that the updated IDP which supports the delivery of the Local Plan will take account of ICB strategies including the Infrastructure Strategy.

H2:31 (Paybody allocation)

- It was agreed that the updated position from the NHS to turn the Paybody Building into a Community Diagnostic Centre has been confirmed and the Council will withdraw the proposed site allocation.

Infrastructure Delivery Plan

- In terms of ensuring that health infrastructure can accommodate the level of growth proposed by the local plan, it was agreed that the S106 process provides a sufficient mechanism for this, where regular engagement with the ICB and LEF already successfully takes place, along with specific discussions on a case-by-case basis with planning application case officers.
- It was agreed that the updated IDP will take account of ICB strategies including the Infrastructure Strategy, with the IDP stating that “new / expanded health facilities to support population growth are to be provided in accordance with the ICB Infrastructure Strategy.” This also provides flexibility and resilience.

Viability Assessment

- The approach to the viability of the Local plan, where explicit allowance for contributions towards health are not included, was agreed by both parties, following an explanation as to why this was the case. Council officers explained that the viability assessment, in line with case law, has not considered specific S106 costs for health as part of the area typologies, as developer contributions for health should only be considered where there is a genuine and demonstrable gap which meets the relevant legal tests in regulation 122 of the Community Infrastructure Levy Regulations 2010. This means that S106 funding can only be considered on a case-by-case basis at

the planning application stage. As acknowledged by NHSPS in the representations, the viability assessment allows sufficient headroom for negotiations to be undertaken, in line with NHS growth plans, where such a need can be demonstrated. It was also confirmed that Coventry does not operate CIL.

- It was confirmed and agreed that the Council engages regularly with the Local Estates Forum to understand infrastructure needs and to hold detailed conversations where applicable to ensure the delivery of appropriate health infrastructure.

Appendix 13 Warwickshire, Coventry, Solihull Local Nature Partnership



Christopher Berry
Planning and Development
Coventry City Council
PO Box 7097
Coventry
CV6 9SL

20.3.2025

Dear Christopher

Re Coventry City Council Local Plan and LNRS aspects across Coventry and Warwickshire

Thank you for the opportunity to comment on the development of the Local Plan. We discussed your request at the LNP Board meeting on 19th March 2025 and agreed that the LNP would write to you.

The LNP Board considers that the Coventry City Council Local Plan must have regard to the WMCA LNRS, the direct LNRS for the Coventry area, and also synergy with Warwickshire LNRS for consistency across the local authority boundaries.

Connectivity will be of key importance to enable nature recovery and to meet Government stated targets for biodiversity and the environment. It is vital that connecting corridors that cross or are adjacent to the boundaries including rivers Sowe and Sherbourne, street tree and hedgerow connections, and adjoining habitat areas are taken as material considerations in the plan, as of high importance for nature recovery and retention of biodiversity value. Local Nature Reserves, Dunsmore Living Landscape NIA, Local Wildlife Sites and potential Local Wildlife Sites should also be of material consideration and should be avoided in allocation of sites.

Our LNRS is in draft currently. Coventry City Council Local Plan should include reference to being consistent with the emerging LNRSs and be able to review allocations in line with the detailed mapping and identified areas for potential for improving biodiversity as these are finalised.

On behalf of the LNP Board



Gina Rowe

Secretariat for Local Nature Partnership for Warwickshire, Coventry and Solihull

Chair of LNP Board: David Lowe

Secretariat at Warwickshire Wildlife Trust, Brandon Marsh Nature Centre, Brandon Lane, Coventry CV3 3GW

Appendix 14 Civil Aviation Authority

Coventry Local Plan Duty to Co-operate



Eggington, Clare
To: arops@caa.co.uk

[Reply](#) [Reply All](#) [Forward](#) [Share](#) [More](#)

Thu 07/08/2025 11:18

Good morning

The Coventry Local Plan Review is due to be submitted shortly to the Planning Inspectorate for examination in public, submission is anticipated to be early September 2025.

The CAA has been consulted at all stages of the plan review but has made no response.

However as a Duty to Co-operate body, in order to assist us in showing that we have complied with the DtC it would be helpful for us to have on record that the CAA has no issues they wish to raise with us as part of the review. If someone could confirm this within the next couple of weeks (ie by 21st August) that would be appreciated.

Kind regards

Clare Eggington
Planning Policy Manager
Regeneration and Economy
Coventry City Council
02476 972751
coventry.gov.uk

From: Ashley Dawkins <Ashley.Dawkins@caa.co.uk>
Sent: 18 August 2025 11:28
To: Eggington, Clare <Clare.Eggington@coventry.gov.uk>
Subject: RE: [External] Coventry Local Plan Duty to Co-operate

OFFICIAL - Public. This email and any files transmitted with it have been cleared for unrestricted distribution.

Good morning,

Thank you for your email.

I can confirm there are no issues the CAA wishes to raise. Please note we cannot provide any indication of the position of any other party, whether they be an airport, Air Navigation Service Provider, airspace user or otherwise. The Local Planning Authority would need to consult such stakeholders directly.

Kind regards,

Ashley Dawkins
Airspace Regulation (SARG)
UK Civil Aviation Authority
Tel: +443301382567
www.caa.co.uk



Please consider the environment. Think before printing this email.

OFFICIAL - Public

Appendix 15 Homes England

Coventry Local Plan Regulation 19 Duty to Co-operate



Eggington, Clare

To enquiries@homesengland.gov.uk



Mon 20/01/2025 15:38

Good afternoon

You will have received an email this morning regarding our Local Plan Review Regulation 19 consultation which runs from 20th January to 3rd March 2025, please see <https://www.coventry.gov.uk/localplanreview> for more information.

As Homes England is a Duty to Co-operate Prescribed Body we would like to request a discussion with yourselves once you have had time to absorb the consultation documents.

We appreciate you will be preparing representations, however under the Duty to Co-operate we will also wish to prepare a Statement of Common Ground with yourselves and of course to understand any issues you wish to raise.

If you could come back to myself so we can get a Teams discussion in the diary at your earliest convenience that would be very much appreciated

Kind regards

Clare Eggington
Planning Policy Manager
City Services
Coventry City Council
02476 972751
coventry.gov.uk

From: Eggington, Clare <Clare.Eggington@coventry.gov.uk>
Sent on: Thursday, August 7, 2025 10:04:34 AM
To: enquiries@homesengland.gov.uk
Subject: Coventry Local Plan

Good morning

The Coventry Local Plan Review is due to be submitted shortly to the Planning Inspectorate for examination in public, submission is anticipated to be early September 2025.

Homes England has been consulted at all stages of the plan review but has made no response.

However as a Duty to Co-operate body, in order to assist us in showing that we have complied with the DTC it would be helpful for us to have on record that Homes England have no issues they wish to raise with us as part of the review. If someone could confirm this within the next couple of weeks (ie by 21st August) that would be appreciated.

Kind regards

Clare Eggington
Planning Policy Manager
Regeneration and Economy
Coventry City Council
02476 972751
coventry.gov.uk

Enquiries email



Homes England Enquiries <enquiries@homesengland.gov.uk>

To Eggington, Clare



Thu 07/08/2025 11:05

Thank you for contacting the Homes England Enquiries team. We aim to reply to online enquiries within 10 working days. If your enquiry is complex, it may take longer to answer and we will let you know when to expect a reply.

Appendix 16 Coventry and Warwickshire Sub-Regional Joint Method Statement

Coventry and Warwickshire Sub-Regional Joint Method Statement

Housing and Economic Land Availability Assessment - Methodology

February 2022

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1. Introduction

- 1.1 The National Planning Policy Framework (the “NPPF”) specifies that policy-making authorities should prepare strategic assessments of land availability for their areas. Arising from this assessment, strategic policies can be formulated to identify areas and locations for growth that can meet development need.
- 1.2 This joint statement has been prepared between the authorities that comprise the Coventry and Warwickshire sub-regional area and is an update from the Joint Statement published in May 2015 to ensure that it reflects the most up to date national guidance from Government.
- 1.3 In line with the recommendations of the Planning Practice Guidance (PPG)²⁶ the methodology is an agreed approach between the Local Planning Authorities (LPAs) that make up the Coventry and Warwickshire Housing Market Area (the HMA) and the Functional Economic Market Area (FEMA) where these two areas overlap. The LPAs are:
- Nuneaton and Bedworth Borough Council
 - Coventry City Council
 - Rugby Borough Council
 - Warwick District Council
 - Stratford on Avon District Council
 - North Warwickshire Borough Council
- 1.4 Forming part of this update is a joint movement away from the original sole focus on housing land assessment, which was referenced as a Strategic Housing Land Availability Assessment (SHLAA) to a **Housing and Economic Land Availability Assessment (HELAA)**, which considers both housing and employment sites . This has been agreed by the LPAs to more appropriately reflect the updates made by the PPG in 2019:

“Plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) that is most appropriate.”

- 1.5 It is not the objective of this joint methodology to standardise the methods made to assess land availability in each Local Authority, but rather provide a broad framework to ensure a consistent approach, which each Local Authority can then use to inform more detailed assessment work. The Planning Practice Guidance provides the context in terms of development types which could be considered:

“Suggested potential type of development (eg economic development uses – retail, leisure, cultural, office, warehousing etc; residential – by different tenures, types and needs of different groups such as older people housing, private rented housing and people wishing to build or commission their own

²⁶ Paragraph 007 Reference 3-007-20190722

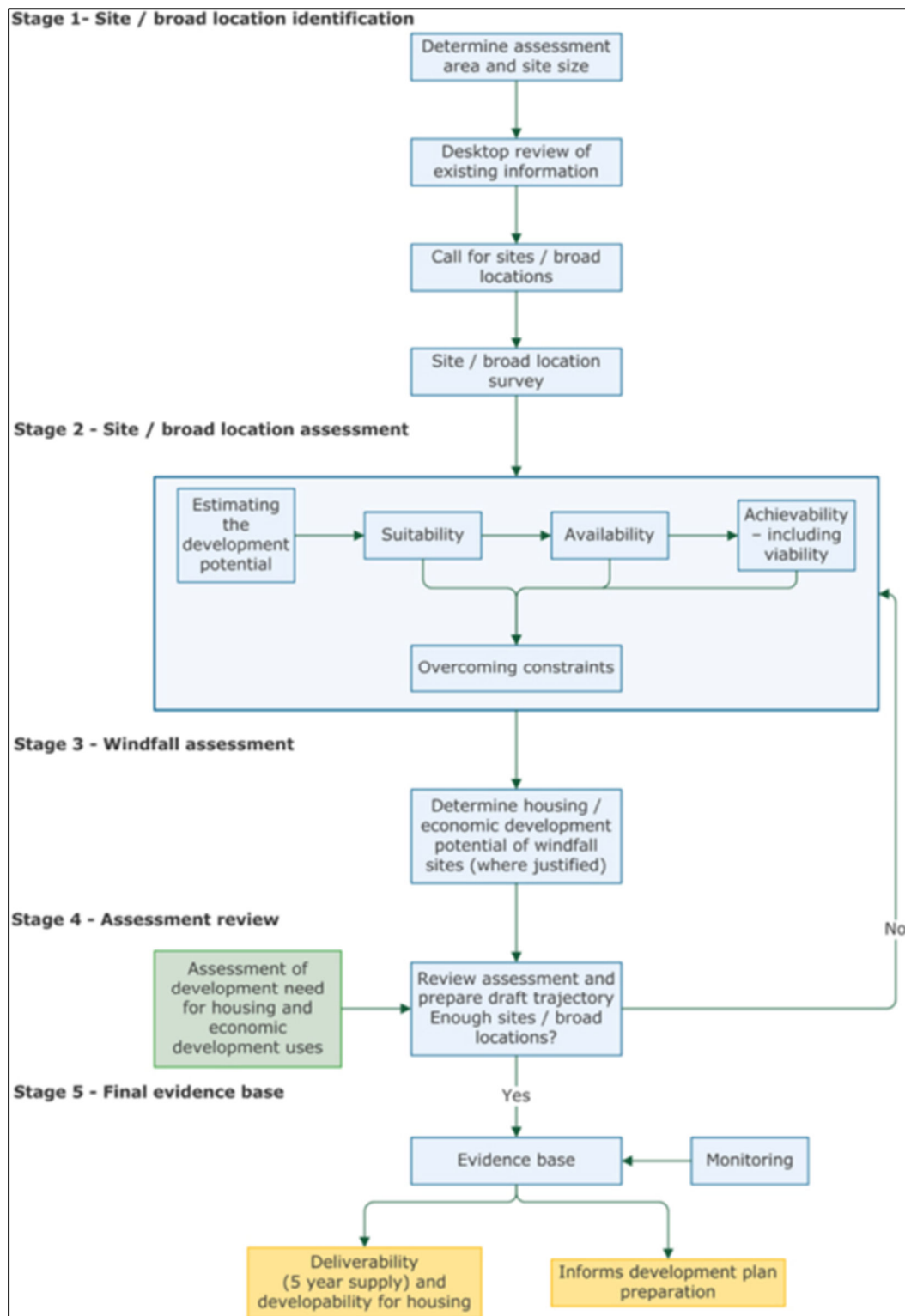
homes)²⁷

- 1.6 The detailed HELAA produced by each Local Authority should:
- Identify sites and broad locations with development potential (housing, economic or other);
 - Assess their potential for development in terms of:
 - o their availability for development and whether they can be brought forward as locations for housing, economic or other form of development;
 - o their suitability to accommodate development, taking into consideration their context, constraints and policy designations;
 - o their achievability in terms of market desirability and viability for development.
- 1.7 Sites that are identified through the HELAA are assessed as to whether they could be developed. The assessment does not make a judgement whether they should be developed. **Assessment does not allocate land for development, nor does it determine the acceptability of development on any site.**
- 1.8 The HELAA will form a part of the Local Plan evidence base for each Local Authority, and sites identified as being developable will need to be considered further in the light of additional evidence.
- 1.9 It will also assist in the preparation of Local Plans by quantifying the availability of land for housing, economic and other development
- 1.10 In preparing the update to the joint methodology, the LPAs consider it to be good practice to publish a draft (this document) and invite feedback for a six-week consultation period to be held in Autumn 2022.
- 1.11 In terms of the further work which each Local Authority will undertake relating to their detailed Call for Sites and assessment processes, it will be the decision of individual Authorities to develop the detail and separately consult on this in a way in which they feel most appropriate within their local context.

2. Methodology

- 2.1 The methodology will establish the basis of the approach to site assessment, but will allow appropriate provisions for further detail to be made to reflect the individual contexts of each LPA area.
- 2.2 The Planning Practice Guidance provides the following flow chart which establishes the basis of the approach to site selection and assessment:

²⁷ Paragraph: 012 Reference ID: 3-012-20190722, 22/07/2019



Stage 1: Identification of sites and broad locations

- 2.3 The PPG establishes that a geographical extent of site selection and assessment should be the plan-making area. This joint statement seeks to

establish the basis of a consistent methodology between the parties involved to reflect the functionality of the HMA and FEMA and comply with the provisions of the Duty to Cooperate.

- 2.4 Guidance states that in the first instance, sites of a smaller size than 0.25ha, or with a capacity fewer than 5 dwellings, should not be considered as part of the HELAA process. The joint methodology will adopt this approach, but LPAs which comprise this joint method may individually opt to consider smaller sites where appropriate justification can be made.

Site Identification

- 2.5 National Guidance stipulates two primary sources in identifying sites:

- Desktop Review
- Call for Sites Exercise

- 2.6 Active desktop review ensures that all suitable sites can be identified even in the case where they have not been submitted to an LPA for consideration.

- 2.7 A desktop review of sites may utilise, but not limited to, the following sources²⁸:

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning application records Development briefs Local Economic Partnerships, business groups etc
Planning Permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completion records Local Economic Partnerships, business groups etc
Planning applications that have been refused or withdrawn	Planning application records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, parish councils, central government, NHS, police, fire services, utilities services, statutory undertakers
Sites with permission in principle, and	Brownfield land registers (parts 1 and 2)

²⁸ Extracted from PPG Paragraph 011 ID: 3-011-20190722

identified brownfield land	National Land Use Database Valuation Office database Active engagement with sector
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, eg offices to residential)	Local Authority empty property register English Housing Survey National Land Use Database Commercial property databases (eg estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers Local Economic Partnerships, business groups, retail forums etc
Additional opportunities for un-established uses (eg making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys County, district and parish council assets
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector Local Economic Partnerships, business groups, retail forums etc
Sites in rural locations	Local and neighbourhood plans Local Economic Partnerships, business groups etc Planning applications Ordnance Survey maps Aerial photography Site surveys
Large scale redevelopment and redesign of existing residential or economic areas	
Sites in adjoining villages and rural exception sites	
Potential urban extensions and new free-standing settlements	

2.8 In addition to a desktop review, a Call for Sites exercise can also enable third parties to promote sites to the LPAs for assessment. This ensures completeness in the HELAA process.

2.9 A Call for Sites conducted independently by each LPA (or LPAs where a joint plan is being prepared) will ensure that sites suitable for all land uses can be submitted for assessment. Submissions can be from any third party, with information stored to comply with data protection regulations.

2.10 A proforma, a copy of which can be seen at **Appendix 1**, will be provided to third parties to provide site submissions to the LPAs. This will provide as much information as possible, including the following details:

- Site location
- Suggested potential type of development
- Scale of development
- Constraints to development

2.11 In respect of constraints, the proforma at Appendix 1 has been developed to allow submissions to establish any mitigations possible to overcome identified constraints. This is to “front-load” site assessment as far as possible and assist in the overall assessment process. This will ensure a more comprehensive assessment of proposed broad locations and potential sites as established in the PPG. It could also help identify potential new broad locations where development may be suitable, such as clusters of individual sites for example where cumulatively they could provide suitable infrastructure to deliver growth in a sustainable way.

2.12 Significant constraints should be considered at this stage where they will affect the assessment of broad locations and sites. This is to ensure that they are appropriately assessed before the detailed assessment stage. The joint statement allows provisions for LPAs to decide on what designations / limitations / constraints might result in site omission at this stage, given the unique contexts of each administrative area.

Stage 2: Site/broad location assessment

2.13 The PPG outlines that at this stage site assessments should analyse sites for their capacity, developability, suitability and achievability.

2.14 *Capacity* should be determined by adopted and/or emerging policy determining appropriate densities, in the context of the National Planning Policy Framework in achieving efficient use of land. This should also take into consideration viability, given the quantum may affect viability and therefore, achievability and so inform developability within 5 years or beyond.

2.15 *Suitability* should be assessed against locational factors, identifiable constraints, their potential for mitigation as well as balancing on their potential impacts as a result of their development. Relevant information to inform this assessment may include:

- National and local policy designations
- Appropriateness and likely market desirability of potential development
- Contribution towards regeneration areas and priorities

- Potential impacts on landscape, natural and heritage designations
- 2.16 Assessment should take into consideration existing Local Plans, but also emerging policy as well as the principle of development established by planning permissions or permissions in principle.
- 2.17 *Availability* can be assessed on the best information obtainable by the LPAs. This can be confirmed through submissions via Call for Sites by agents, landowners and/or promoters. Extant or expired planning permission can also inform availability and will establish 5-year timeframes, or beyond, of developability.
- 2.18 *Achievability* is assessed through best judgement on the economic viability of a site and its desirability to be delivered within particular market conditions. This can also be informed via submissions by third parties, where indication can be made of the potential type of development and how this will influence viability/desirability.
- 2.19 Assessment of overall developability should take into consideration any constraints and how they may influence the suitability of the site and its achievability. Desktop review will take this into account but this will need to draw on various sources of information to make an appropriate best judgement. In the case of a submission via a Call for Sites, front-loading information will be vital in identifying constraints and establishing mitigation. This will provide evidence in presenting the overall developability of a site.
- 2.20 When taking all of the above into account, the LPAs will be able to identify a timescale and rate of development that could be realised on those sites determined as deliverable and developable (suitable, available and achievable). This will take into account size, scale and quantum of development, which in turn should take into consideration lead-in times and build-out rates.
- 2.21 Whilst best judgement by the LPAs can guide these timescales and development rates, advice will also be sought from developers and other third parties submitting sites for assessment.

Stage 3: Windfall assessment

- 2.22 Development sites that come forward outside of identification through the HELAA (or any other Planning Authority spatial assessment) are defined as windfall sites.
- 2.23 The PPG outlines that an allowance of windfall sites may be included within the land supply identified through the HELAA, but must be appropriately justified as established at Paragraph 71 of the National Planning Policy

Framework (July 2021);

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

- 2.24 It is not the objective of this joint statement to establish windfall allowances for each LPA. The windfall allowance is specific to each Local Authority area and the local evidence base for each will be used to inform this work and decide the extent to which windfall development should be considered in the HELAA process. An explanation of this assessment, with justification of conclusions will be provided by each LPA individually.

Stage 4: Review of the assessment

- 2.25 Following assessment of sites and broad locations, an indicative trajectory will be produced. This will express the development quantum potentially available in terms of housing numbers and employment land and potentially the amount of other land uses that have been identified.
- 2.26 The trajectory will outline the forecasted delivery of development in three increments; 1 to 5 years, 6 to 10 years and 11 years and beyond. A risk assessment will accompany any trajectory, explaining specific issues to delivery which may impact on the trajectory.
- 2.27 At this stage, an LPA may identify a shortfall in supply to meet the needs of the plan area. The PPG advises that a Local Authority should re-visit their assessment, including enhancing or changing site capacities and densities in line with the NPPF's promotion of efficient use of land.
- 2.28 If evidence shows that a shortfall in provision continues to exist, LPAs should consider continued cross-boundary provisions in accordance with the statutory Duty to Co-operate. This will enable the necessary Statements of Common Ground and other joint agreements to be formulated as Local Plan work progresses, helping to achieve sound Local Plans.

Stage 5: Final evidence base

- 2.29 The final HELAA report for each Local Authority (or Authorities where a joint plan is being prepared) will establish the approaches taken and identify the deliverable and developable sites and show a clear supply trajectory. All sites

will be cross-referenced with location maps and their site assessments. The final report should also include sites that have been omitted from the supply, with reasons why.

- 2.30 The HELAA will be used by the Local Authorities to demonstrate a 5-year housing land supply position, as well as informing other strategic policies within the plan preparation process. Paragraphs 20-23 of the National Planning Policy Framework provide more detail on what is meant by 'strategic policy'.
- 2.31 A final report with appendices where appropriate and relevant will be published on each Authority's website for public view.

3. Implementation

- 3.1 This statement establishes the joint methodology in implementing a HELAA across the Coventry and Warwickshire sub-region.
- 3.2 The Planning Practice Guidance determines how housing and economic land assessment should be conducted and this has been closely woven into the joint methodology.
- 3.3 How this is implemented in practical terms is dependent on the local context. As such, this joint methodology references the functional relationships of the HMA and FEMA, whilst also providing sufficient flexibility for assessing sites in a range of contexts.
- 3.4 For example, the LPAs have agreed the importance of "front loading" information as far as possible. Previous experience has identified issues with understanding constraints and how they can be mitigated. The model Call for Sites proforma (Appendix 1) has therefore been updated from the previous version, allowing for additional information to be submitted, and each LPA can adapt this as it sees fit. This will assist in the site assessment stage.
- 3.5 Understanding the broader context of promoted sites is helpful and this is also reflected in the model proforma, where promoters are encouraged to indicate land for assessment (red line), and other land under the same ownership (blue outline). This provides additional flexibility in site assessment, especially in the case where the 'red-line' areas may be particularly constrained, but the additional 'blue-line' land may be available for mitigation purposes.
- 3.6 Although a detailed approach to assessment is not specified in this joint statement, to allow for flexibility for each individual LPA, it is expected that final assessments will produce conclusive commentary as to how sites have been assessed in either narrative or pictorial form, or both, presented in a clear, transparent and accessible manner.
- 3.7 To illustrate this point, an example is set out below. In this instance, a 'red-amber/yellow -green' approach (RAG) has been used. Sites would be scored

using particular suitability, achievability and availability considerations. Those sites for which constraints are absolute and cannot be mitigated would be scored red. Amber sites would have the potential to be mitigated and could be 'upgraded' to yellow depending on the level of information supplied which could demonstrate this mitigation. Green sites would have no constraints and could readily form part of the short-term supply.

Figure1: Example of a site assessment matrix (illustrative: each LPA would develop its own methodology for this level of detail)

		Availability & Achievability		
		Red	Amber	Green
Suitability	Red	Red	Red	Red
	Amber	Amber	Amber	Yellow
	Green	Green	Amber	Green

3.8 To summarise: this document has been prepared jointly to ensure a consistent shared approach to identifying and assessing sites for housing and employment uses, which will be used by each Local Authority (or alliance of Local Authorities where shared plans are developed) as the framework within which they will develop their detailed assessment and selection processes.

Appendix 1 Example Call for Sites Proforma

Housing and Economic Land Availability Assessment (HELAA)

Call for Sites Proforma

- Please complete this form if you would like to suggest proposals for future land use and development within XX Council on sites capable of delivery 5 or more homes, sites larger than 0.25ha or sites which are to be considered for economic uses (see Planning Practice Guidance for further information).
- The sites will be assessed as part of the HELAA and used as an evidence base document for the Local Plan preparation process.
- Please complete a separate form for each site. Complete each section clearly and legibly to the best of your knowledge. If you require more space, please use Section 9, or append additional pages.
- You must attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site and details of site ownership.

Data Protection Disclaimer

Details submitted to the Council as part of a Call for Sites will help inform the HELAA and assist in identifying land for development to contribute to a land supply to meet local need. The submitted information will not be confidential as it will be published as part of a comprehensive land assessment via published reports available for public consumption. This information will also be shared with other parties, including employees of the Council, other Council departments and third parties, such as the Planning Inspectorate and other Local Planning Authorities.

Details provided in Section 1 will be kept and stored confidentially by the Council. Details in Section 2, the names of which should match those provided in Section 1, will be made publicly available as established above. As such, only names of organisations/agents/applications will be made public where it has been clearly declared through this submission form. No other details, such as addresses or contact information, will be made available.

By submitting this form to the Council, you are providing consent for us to retain your details on our Planning Policy as part of the Call for Sites process, the HELAA and to enter your details to our consultation database so that we may contact you in future to advise on the Local Plan preparation process.

1. Your Confidentially Held Details			
Title		Name	
Organisation (if relevant)			Representing
Address			
Postcode		Telephone	
Email			
Signature			
Date			

2. Your Publicly Viewable Details	
Name/Organisation	
Status in relation to site	
Representing (if applicable)	

3. Site Location			
Site Name			
Site address (inc. postcode if known)			
OS Grid Easting		OS Grid Northing	
Total Site Area		Developable Area	
<p>Please attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site. The area of the site you wish to be formally assessed should be enclosed by a red line. Any other relevant land under your ownership should be enclosed by a blue line</p>			

4. Site ownership (please tick as appropriate and/or provide details)				
Do you own the site?	Yes – sole owner	Yes – part owner	Yes – acting on behalf of the owner(s)	No
Is the site available?	Yes – immediately	Yes – In 5-10 years	Yes – 11+ years	No
Have you notified the landowner/other landowners that you have submitted the site?			Yes	No
Other relevant information eg is there a promotion / option agreement, is a developer on board etc				

5. Site Constraints (on site or at boundary – please mark as appropriate and/or provide details)					
Current/previous use					
Adjacent land uses					
Planning History					
Existing Infrastructure	Electricity	Gas	Mains Sewer	Mains Water	Telecoms
Access from Highway	Yes – Classified Road		Yes – Unclassified Road		No
Highway Works					
Ransom Strips / third party land required etc					
Legal Issues					

Existing Occupiers			
Public Access/Rights of Way			
Topography			
Ecology/Wildlife Designations and other known issues	Yes – Details:	Reports/Mitigation Strategy:	No
Trees, hedgerows and woodlands (eg TPOs, other protections and designations)			No
Land Contamination / unexploded ordnance (in areas where this is relevant)	Yes – Details:	Reports/Mitigation Strategy:	No
Heritage Designations (eg listed buildings, conservation areas, local list, archaeology etc)	Yes – Details:	Reports/Mitigation Strategy:	No
Flooding	Yes - details	Reports/Mitigation Strategy:	No
Other Physical Constraints (eg water bodies, ditches etc)	Yes – Details:	Reports/Mitigation Strategy:	No
Infrastructure	Yes – Details:	Reports/Mitigation	No

Constraints (eg pylons, gas mains, telecommunications etc)		Strategy:	
Open space and recreation E.g. playing pitches, parks and gardens, allotments and orchards etc	Yes - details	Reports/Mitigation Strategy:	No
Other Knowns Issues/Constraints			

6. Site Accessibility (please provide distance as measured from the middle of the site “as the crow flies” and utilise journey planner to determine walking time)			
Distance to closest bus stop (m/km)		Walking time to closest bus stop (mins)	
Distance to closest amenities (m/km)		Walking time to closest amenities (mins)	
Distance to closest rail station (m/km)		Walking time to closest rail station (mins)	
Any known issues with public transport – frequency of services etc		Any known issues with amenities eg limited capacity at schools, GPs etc	

Other accessibility issues relevant to the nature of the proposal			
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7. Previous site promotional work (please cross reference with Section 5 where relevant)		
Has any work been undertaken to promote the site and/or to overcome constraints?	Yes	No
If yes, please provide more details and copies of reports where available:		
Have any viability appraisals been undertaken?	Yes	No
If yes, please provide more details and provide copies of reports where available:		
Are there any specific or immediate intentions to start development?	Yes	No
If yes, please provide more details (such as Pre-application discussions)		

8. Proposal Details (please mark as appropriate and/or provide details)					
Description of Proposed Development					
Proposed Land Use	Residential	Employment	Retail	Mixed	Other
Site capacity/density (homes/floor space)			Details of mixed/other land uses		

Potential Development	For sale/marketed for development	Negotiations with developer	In control of developer	Ready for release by owner
Development time scales	Short term (within 5 years)	Medium term (6-10 years)	Long term (11-15 years)	Beyond (16+ years)
Development Timescale/Phasing (incl. build-out rates)				

9. Additional information eg relevant evidence, other constraints and challenges, market desirability, planned infrastructure, opportunities etc

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10. If the site fits the criteria for a brownfield site are you happy for us to include it on the relevant LPA brownfield land register (tick as appropriate)

Yes	No

If you need this information in another format or language,
please contact us

e-mail: planningpolicy@coventry.gov.uk