

Cabinet  
Council

2<sup>nd</sup> September 2014  
9<sup>th</sup> September 2014

**Name of Cabinet Member:**

Cabinet Member (Business, Enterprise and Employment) – Councillor K Maton

**Director Approving Submission of the report:**

Executive Director, Place

**Ward(s) affected:**

All

**Title:**

New Coventry Local Plan – Delivering Sustainable Growth (2011-2031) and the Updated Local Development Scheme (2014)

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**Is this a key decision?**

Yes - The proposals in the report are likely to have an impact on all wards across the City

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**Executive Summary:**

In April 2013, as a result of Planning Inspectorate recommendations, the Council withdrew a previous version of its Core Strategy from examination. This was due to issues with the Duty to Cooperate, which requires the Council to work constructively with neighbouring councils. The Inspectorate recommended an independent assessment of housing need for Coventry's wider strategic housing market area (HMA).

In November 2013 independent consultants completed work on the joint strategic housing market assessment (SHMA), which responded to the Inspectorate's recommendations and identified the objectively assessed housing need (OAN) for all six authorities within the Coventry and Warwickshire strategic housing market area.

The Joint SHMA recommended that 23,600 homes needed to be built in Coventry between 2011 and 2031 (1,180 a year). This is referred to as the 'objectively assessed need for housing' (OAN) and is an essential requirement of producing a local plan.

Since the joint SHMA was completed the Office of National Statistics (ONS) has issued new population projections (May 2014). In order to understand the impact of this new data, the six Coventry and Warwickshire authorities jointly commissioned the same independent consultants to produce an Annex to the joint SHMA. This report is now complete and identifies a significant increase in Coventry's housing need, coupled with a significant reduction in the housing needs of Warwickshire.

The Annex recommends a revised need of 36,220 new homes in Coventry between 2011 and 2031 (1,811 a year). The overall total remains broadly consistent with an increase of around 200 homes a year for the whole of Coventry and Warwickshire compared to the original projection in the joint SHMA (2013). The study also considers housing pressures as they may arise from jobs

growth anticipated by the Strategic Economic Plan (SEP), which would place an upward pressure on the housing needs of Coventry and Warwickshire as a whole.

As part of the study's conclusions, and in line with national guidance greater emphasis is placed on the overall needs of Coventry and Warwickshire as a whole. From the Coventry perspective it is reasonable to expect that the OAN identified in the joint SHMA will reflect a minimum requirement for Coventry up to 2031, and that the Duty to Cooperate, will form an integral part of meeting and delivering the city's housing need.

With this in mind the Local Plan commits the Council to continue to work alongside its Warwickshire neighbours to secure the most appropriate and sustainable locations for housing growth across the housing market area. Where need can realistically be considered to originate from the city and where appropriate, sustainable and deliverable the Council will support its Warwickshire neighbours in bringing forward land for housing and employment that sits adjacent to the city's existing boundaries. This will ensure infrastructure needs are met in full across administrative boundaries (where and as appropriate). It will also help to ensure that the planning for the areas housing needs gives consideration to the distribution issues associated with the new ONS based projections and the economic needs of Coventry and Warwickshire.

For too long Coventry has punched below its weight and has lost jobs and employment opportunities to other parts of the country. This is a trend that needs to be reversed to help return Coventry to the status of a 'top 10 city'. As a result of focused action and delivery by the Council and the Local Enterprise Partnership the city's decline has, in recent years, been challenged and is now being reversed. The housing pressures outlined in this report is testimony to the growing demand from people who want to live and work in the city, and who are increasingly attracted to the area as a result of the resurgence of manufacturing industries in the sub-region, the success of our two world class universities and the growth in jobs across many sectors.

Appendix 1 seeks views and opinions on the level of housing need in Coventry, whilst setting it in the context of the city's growth aspirations and the needs of the HMA. It also places the level of housing need in some further context in terms of the step change in housing need, the deliverability of such figures and the impact on the Duty to Cooperate.

In addition to the level of housing need, the paper draws on previous rounds of consultation on the Local Plan (or Core Strategy as it was known) to present three scenarios relating to how housing needs could be delivered.

Scenarios 1 and 2 are presented as extreme positions, with Scenario 1 based on protecting the Green Belt and exporting a proportion of Coventry's need beyond the Green Belt into Warwickshire. Scenario 2 looks to accommodate all of the city's need within its own boundary (regardless of quantum), including on Green Belt land. Scenario 3 proposes a balanced approach based on the most sustainable options, but including some Green Belt development. This is presented as the Council's preferred approach and is considered a sustainable, deliverable and justified approach to meeting Coventry's housing needs.

Furthermore two specific policies are proposed in respect of sustainable development and the Duty to Cooperate, whilst thirteen summary chapters are also presented covering a range of other policy areas, including but not limited to health and wellbeing, design, economic growth and infrastructure.

Accompanying this stage of the new Local Plan is an update of the Local Development Scheme (LDS). The LDS is a mandatory requirement of the Planning and Compulsory Purchase Act and sets out what the Council will produce to set its new planning policies and when they will be produced. The previous LDS was published in 2012 in relation to the now withdrawn Core Strategy.

The LDS contains three separate documents planned for development. These include the Local Plan, the City Centre Area Action Plan and the Community Infrastructure Levy. All are projected to be adopted by the summer of 2016.

**Recommendations:**

The Cabinet is requested to:

- 1) Recommend that the Council approves the "New Local Plan – Delivering Sustainable Growth (2011-2031)" document and authorises a period of seven weeks public engagement beginning on Friday 12<sup>th</sup> September 2014 and ending on Friday 31<sup>st</sup> October 2014.
- 2) Recommend the Council endorse the updated Local Development Scheme (2014) as the timetable by which Coventry's new Local Plan and supporting documents will be prepared.

The Council is recommended to:

- 1) Approve the "New Coventry Local Plan – Delivering Sustainable Growth (2011-2031)" document and authorise a period of seven weeks public engagement beginning on Friday 12<sup>th</sup> September 2014 and ending on Friday 31<sup>st</sup> October 2014.
- 2) Endorse the updated Local Development Scheme (2014) as the timetable by which Coventry's new Local Plan and supporting documents will be prepared.

**List of Appendices included:**

Appendix 1: New Coventry Local Plan – Delivering Sustainable Growth (2011-2031)

Appendix 2: Local Development Scheme (2014)

**Background papers**

None

**Other useful documents:**

- The Coventry and Warwickshire Joint Strategic Housing Market Assessment (Joint SHMA) (2013) available to download via: <http://www.coventry.gov.uk/housingnumbers>
- Annex to the Joint SHMA – 2012 based Sub-National Population Projections: Implications for Housing Need in Coventry and Warwickshire (2014) available to download via: <http://www.coventry.gov.uk/housingnumbers>

**Has it been or will it be considered by Scrutiny?**

The report itself will not be considered by Scrutiny, however the results of this period of public engagement will be considered by Scrutiny Board 3 at its meeting on the 12<sup>th</sup> November 2014.

**Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?**

No

**Will this report go to Council?**

Yes - 9<sup>th</sup> September 2014

**Report title:** New Coventry Local Plan – Delivering Sustainable Growth (2011-2031) and the Updated Local Development Scheme (2014)

**1. Context**

**Background**

- 1.1 In April 2013 the Council was recommended by the Planning Inspectorate to withdraw from examination the previous version of its Core Strategy due to issues with the Duty to Cooperate. As part of the Inspector's recommendation he highlighted a need to undertake an independent assessment of housing need for Coventry's wider (Strategic) Housing Market Area (HMA). This is largely considered to cover the six local authorities within Coventry and Warwickshire and largely reflects a broad area within which people live, work, travel to work and move home.
- 1.2 In November 2013 independent consultants completed work on the Joint Strategic Housing Market Assessment (SHMA), which responded to the Inspector's recommendations and identified the Objectively Assessed Housing Need (OAN) for all six authorities within the Coventry and Warwickshire Strategic Housing Market Area. The study showed that although some relationships between the respective authorities were stronger than others the six authorities together represented an appropriate HMA within which to plan for housing need.

**Identifying Housing Need**

- 1.3 The Joint SHMA used trend data from the Office for National Statistics (The ONS) covering the five year periods to 2010 and 2011 alongside some of the initial data from the 2011 Census, and recommended that 23,600 homes need to be built in Coventry between 2011 and 2031 (1,180 a year). This is referred to as the 'Objectively Assessed Need for Housing' (OAN) and is an essential requirement of producing a local plan.
- 1.4 Since the Joint SHMA was completed, however, the ONS has issued new population projections (May 2014) that are based on new trend data for birth rates, death rates and migration, covering the five year period to 2012. This means the data is '2012 based' and is the first to fully reflect the results of the 2011 Census.
- 1.5 In order to understand the impact of this new data on the recommendations of the Joint SHMA, the six Coventry and Warwickshire authorities jointly commissioned the same independent consultants to produce an Annex to the Joint SHMA.
- 1.6 This report is now complete and identifies a significant increase in Coventry's housing need, coupled with a significant reduction in the housing needs of Warwickshire. This recommends a revised need of 36,220 new homes in Coventry between 2011 and 2031 (1,811 a year). The overall total for the HMA however remains broadly consistent, with an increase of around 200 homes a year for the whole of Coventry and Warwickshire when compared to the Joint SHMA (2013). The study also considers housing pressures as they may arise from jobs growth anticipated by the Strategic Economic Plan (SEP). This could again place an upward pressure on the housing needs of Coventry and Warwickshire as a whole.
- 1.7 As part of the study's conclusions greater emphasis is placed on the overall needs of Coventry and Warwickshire as a whole, which conforms to national guidance. From the Coventry perspective it is reasonable to expect that the OAN identified in the Joint SHMA (23,600 homes) will reflect a minimum requirement for Coventry up to 2031, and that the

Duty to Cooperate, most notably with the city's Warwickshire neighbours, will form an integral part of meeting and delivering this housing need.

- 1.8 With this in mind, it is important to note that the National Planning Policy Framework (NPPF) requires the most up to date demographic information to be used as a starting point when considering housing need, but also requires such need to be established and considered as part of a housing market area. It is also essential that subsequent housing requirements are deliverable and allow for sustainable development.
- 1.9 With this in mind the Local Plan commits the Council to continue to work alongside its Warwickshire neighbours to secure the most appropriate and sustainable locations for housing growth across the Housing Market Area. Where need can realistically be considered to originate from the city and where appropriate, sustainable and deliverable the Council will support its Warwickshire neighbours in bringing forward land for housing and employment that sits adjacent to the city's existing boundaries. This will ensure infrastructure needs are met in full across administrative boundaries (where and as appropriate). It will also help to ensure that the planning for the areas housing needs has regard to the distribution issues associated with the new ONS based projections and the economic needs of Coventry and Warwickshire.
- 1.10 As a result this stage of the new Local Plan seeks views and opinions on the level of housing need in Coventry, whilst setting it in the context of the city's growth aspirations and the needs of the HMA as a whole. It also identifies the number of homes being planned in each of the neighbouring authorities (at the current time) and places the level of housing need for Coventry in some further context in terms of the step change in housing need, the deliverability of such figures and the impact on the Duty to Cooperate
- 1.11 To support this, the table below shows examples of Coventry's house building trends using five year averages alongside the annual requirement identified in the Joint SHMA and its Annex.

5 year period	1951-1955	1961-1965	1981-1985	1991-1995	2001-2005	2009-2013	Joint SHMA	New ONS based Data
Avg. homes built a year	2,150	1,476	795	509	468	759	1,180	1,811

- 1.12 The higher rates of house building suggested by the table above however are not a new phenomenon. Table 4 shows that during the 1950s and 60s the rate of house building in Coventry was significant, reflecting a period of economic growth and prosperity for the city. The data from the ONS shows more people are moving to Coventry and that fewer people are leaving, more people are having children and life expectancy is improving. This means the city demonstrates a significantly younger population profile than its Warwickshire neighbours, providing a growing employment base that will increasingly require high quality jobs and education opportunities. The alternative is to allow these people to leave the city in search of jobs and homes elsewhere in the country.
- 1.13 It is this trend that has been too prevalent in Coventry in recent times, with the city experiencing population decline as recently as the early 2000s and losing jobs and employment opportunities to other parts of the country.

### Delivering New Homes

- 1.14 In addition to considering how many homes are required, the Local Plan must also consider where new homes would be built. As part of this process this paper has drawn on significant amounts of consultation that has been undertaken with local communities and

key stakeholders over the last 10 years and presents three possible scenarios for delivering housing need within and potentially outside of Coventry. For the purposes of this paper these scenarios are presented in broad terms as opposed to specific sites. Scenarios 1 and 2 are presented as extreme positions, or polar opposites, and have again been drawn from consistent consultation responses received to previous versions of the Local Plan (or Core Strategy as it was known). Scenario 3 is presented as the Council's preferred approach and is considered a sustainable, deliverable and justified approach to meeting Coventry's housing needs. The three scenarios can be summarised as follows:

1. Protecting the Green Belt. This would constrain the amount of homes that would be built in Coventry by only planning for the amount of homes that could be accommodated within the existing urban area, with the vast majority on brownfield land. This would deliver up to 16,500 homes in Coventry with the remaining housing need redistributed to Warwickshire, outside of the Coventry Green Belt.
2. Building within the Boundary. This would see the city ensure all of its housing need was met within its own boundary regardless of quantum. Although evidence would be used to protect the most sensitive and valuable Greenfield and Green Belt land, it is possible that negative impacts would be generated with regards landscape character, environmental impact and effect on the Green Belt.
3. Sustainable Growth. This would see Coventry accommodate as much growth as possible within its own boundary, including on its least sensitive and 'valuable' Greenfield and Green Belt land, and then working with Warwickshire authorities to accommodate the remaining need in the most appropriate and sustainable way. This would be heavily dependent on the outcomes of the Joint Green Belt review and other relevant evidence.

1.15 To help inform the period of public engagement, the paper presents a list of strengths and weaknesses alongside basic maps to help illustrate each option. This supporting analysis considers economic, environmental and social factors, such as impact on the environment, investment opportunities around jobs and retail and the provision of infrastructure.

### **Supporting Sustainable Development**

1.16 It is important to note that the new Local Plan will not focus solely on housing growth and delivery. There are many other areas of planning policy that require attention and that will help support the sustainable growth of Coventry. This aspect is important in terms of considering Coventry's growth in a joined up way, creating the necessary links between housing need, jobs growth and improvements to the city's retail and leisure offer for example. As such, the local plan will seek views and comments from stakeholders and local communities on two over-arching policies that focus on sustainable development and the Duty to Cooperate. The first is a specific requirement linked to national guidance and ensures the Council's Local Plan will promote sustainable development in all aspects of its plan. The second identifies the Council's on-going commitment to joint working with its neighbours around evidence and the delivery of strategic matters such as housing, employment and infrastructure.

1.17 Summary notes on thirteen policy chapters are then presented and although no specific policies are proposed each respective chapter provides an overview of the policy direction and highlights key areas of consideration. These should not be read in order of importance or priority. These include:

1. Employment and economic growth. Provides a policy basis that promotes economic growth, job creation and prosperity. It draws links to the LEP and the

SEP, looks to focus new office development to the city centre, protect the best employment land and focus other new employment provisions to the most sustainable locations. It will also retain a 'minimum reservoir' of available employment land to support new development.

2. Wider housing issues. Provides a policy basis for providing new affordable housing, improving the existing stock, prioritising new purposes built student accommodation, care homes and provide adequate sites for gypsies and travellers.
3. Shopping and centres. Promotes a city centre first approach and restricting out of centre retail. Provides a policy basis for considering the impacts of hot food takeaways on public health.
4. Social, community and neighbourhood. Promotes the city centre as a focal point for new social, community and leisure provisions. Includes support for universities and school rebuilding plans whilst providing a basis for considering new school and places of worship applications.
5. Conservation and heritage. Re-confirms the designated conservation areas and looks to protect the city's heritage assets. The loss of such assets will not be accepted whilst a steer is provided about appropriate design within conservation areas.
6. Health and wellbeing. This is the first time that a Coventry Local Plan will contain specific policy guidance on health and wellbeing since the 1950s. It will promote active travel, access to healthy food, improved housing quality, and adequate provision of green spaces and improvements to air quality. Together these factors will help reduce health inequalities and improve life expectancy. The introduction of Health Impact Assessments will also be explored as part of significant new development schemes.
7. Green infrastructure (green spaces). Policy will look to enhance existing green infrastructure and improve the network of green spaces throughout the city. It will look to protect the most valuable and sensitive green spaces, including ancient woodlands and Sites of Special Scientific Interest (SSSI), enhance biodiversity and provide new green infrastructure opportunities throughout the city and as part of new development schemes. Green Belt boundaries will be managed in balance with the need for new homes and employment opportunities as appropriate and as informed by evidence.
8. Urban and landscape design. The chapter promotes excellent design throughout the city, promoting accessible public spaces and connectivity. Any release of land from the Green Belt to support development needs, will be subject to particular design standards.
9. Transport and movement. Existing transport networks will be enhanced and new transport routes provided as and where required to support new homes and employment opportunities. A change in lifestyle choices will be promoted to encourage further increases in walking, cycling and public transport usage. A fluid and well-connected transport network is identified as vital to the city's continued economic growth.
10. Environmental management. To support carbon reduction and improvements to air quality and renewable energy production. Blue and green

infrastructures are highlighted within the context of drainage and flood risk management. Improved building standards are encouraged in conjunction with building regulations, as is climate change adaptation.

11. Minerals and waste. The chapter promotes a reduction of average waste generation whilst encouraging recycling of materials in development and joint working to ensure adequate mineral provision to support development.

12. Infrastructure. This chapter highlights the importance of ensuring adequate infrastructure is provided to support sustainable development. To support the chapter an appendix to the Local Plan is included to provide an initial insight into infrastructure needs associated with growth. This includes necessary provisions to support the delivery of possible urban expansion opportunities. This will also help stimulate debate with service providers to help expand this area of work and knowledge.

13. Monitoring. The final chapter highlights a number of areas for monitoring in order to assess the progress of the plan once it's adopted.

1.18 To summarise, the purpose of this version of the Local Plan (included at Appendix 1) is to actively engage and begin the conversation with all residents and stakeholders with regard to:

- The most appropriate, deliverable and sustainable approach to delivering the housing needs of Coventry within the context of the wider Housing Market Area
- Whether or not the Council's desire to support the city's recent employment growth and continued economic progress through the increased delivery of new, high quality homes is supported by communities and stakeholders
- Whether or not the draft policies relating to sustainable development and the Duty to Cooperate are considered adequate and appropriate to support the Local Plan
- Whether the summary notes for the thirteen policy chapters cover all necessary policy areas and provide a suitable steer to help develop new local policy in the next stage of the Local Plan.

### **The Local Development Scheme (LDS)**

1.19 Accompanying this stage of the new Local Plan is an update of the Local Development Scheme (LDS). The LDS is a mandatory requirement of the Planning and Compulsory Purchase Act and sets out the documents that Coventry City Council intends to prepare as part of the new Local Plan and the timetable within which they will be prepared.

1.20 The Council's LDS was last updated to support the 2012 version of the Core Strategy, and since that document has now been withdrawn there is no up to date LDS to set out how the new Local Plan will be progressed and developed.

1.21 The LDS contains three separate documents planned for development.

1. The first is the Local Plan itself, which is expected to reach public examination late next year with adoption in 2016.
2. The second document is the City Centre Area Action Plan which will be consulted on for the first time in early 2015, and is expected to be adopted in summer 2016.
3. The third is the Community Infrastructure Levy (CIL), which will again be consulted on for the first time in early 2015 before being adopted by summer 2016.



## **2. Options considered and recommended proposal**

- 2.1 In relation to the Local Plan there are three realistic options. The first of these is to do nothing and not progress a Local Plan. This option is not realistic as without a Local Plan the Council will be subject to planning by appeal, having little or no control over planning within its own administrative boundaries.
- 2.2 The second option would be to publish a raft of growth options for detailed consultation. This option would mean the Local Plan would fail to comply with national guidance around objectively assessed housing need, and outlines an approach that could in practical terms result in the managed decline of Coventry. The Council has consulted with local communities and key stakeholders on numerous occasions over the last 10 years, with particular focus on the number of homes proposed for Coventry. The responses received have largely been consistent, well presented and justified in their approach. To consult on a number of detailed options that would not be realistic or appropriate to delivering the growth needs of the city is not considered reasonable or justified and has been discounted for this reason.
- 2.3 The third option is presented within this report and the Paper at Appendix 1. This involves engaging key stakeholders and the local community in relation to the evidenced level of housing need, including the recent information published by the ONS and the delivery pressures associated with it. It also draws on the consistent and well-argued consultation responses received over recent years to identify three scenarios, including a preferred approach, around how growth is provided. With support from the Sustainability Appraisal process and building upon consultation exercises that have covered the previous 10 years, this considers all reasonable alternatives and seeks to engage with local people and key stakeholders in the development of the new Local Plan for Coventry.
- 2.4 In relation to the LDS there are two realistic options. The first is again to do nothing. This option is discounted as to not produce a LDS would prevent the Council from formally setting out its timetable for developing its new Local Plan and supporting documentation. It would also mean the Council would fail to meet one of the statutory requirements of the Planning and Compulsory Purchase Act.
- 2.5 The third option is recommended by this report and would see the Council discharge one of statutory requirements in setting out the timetable for producing its new Local Plan and supporting documents.

## **3. Results of consultation undertaken**

- 3.1 Numerous periods of public consultation have taken place since 2004 that have related to the development of the Local Plan (or the Core Strategy as it was previously known). The results of this consultation have been reported to Council at numerous times in the last ten years.
- 3.2 The recommended seven week period of public engagement will be the first consultation exercise in relation to this version of the Local Plan. The representations received during this period will be analysed by Officers. The outcome of the consultation and any consequent changes to the Local Plan will be reported to Scrutiny in November and Cabinet and Council in early 2015.

## **4. Timetable for implementing this decision**

- 4.1 Subject to approval by Cabinet and Council, the new Local Plan – Delivering Sustainable Growth Paper will be launched for a seven week engagement period with the public from Friday 12 September. The engagement period will close on Friday 31 October 2014.
- 4.2 Subject to the approval by Cabinet and Council the Local Development scheme will then be published on the Council's website with immediate effect and establish the timetable by which the Local Plan and supporting documents will be delivered.

## **5. Comments from the Executive Director, Resources**

### **5.1 Financial implications**

The only costs resulting directly from the recommendations in this report are associated with the proposed public engagement that relates to this stage of the Local Plan paper and are principally concerned with printing and postage of letters and the document itself. These costs will be absorbed within existing budgets.

### **5.2 Legal implications**

The proposed consultation period of seven weeks exceeds the usual minimum specified by the regulations, and by the Council's adopted Statement of Community Involvement, for a planning policy consultation period. This will provide extra time to engage with local people and key stakeholders.

The proposed period of public engagement will help to ensure that the Council can demonstrate that it has considered all reasonable alternatives when considering its approach to housing growth and delivery mechanisms, and that it has involved the local community and others with an interest in the process. This substantially increases the chances that, in due course, the Core Strategy will be found to be legally compliant by the independent Inspector.

In addition, through this version of the Local Plan the Council will continue to engage constructively and actively with its neighbouring authorities as part of the Duty to Cooperate, as set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as introduced by the Localism Act 2011).

It is considered that this period of community and stakeholder engagement confirms to the requirements of the Planning and Compulsory Purchase Act 2004, the Localism Act (2011) and other associated regulations, the National Planning Policy Framework 2012, and National Planning Policy Guidance (2014).

## **6. Other implications**

### **6.1 How will this contribute to achievement of the Council's key objectives / corporate priorities (corporate plan/scorecard) / organisational blueprint / Local Area Agreement (or Coventry Sustainable Community Strategy)?**

- A prosperous Coventry: Choosing the right approach to delivering the city's housing needs will ensure that sufficient new homes are provided to meet the needs of local people, and that businesses are not deprived of staff through a lack of housing;
- Citizens living longer, healthier, independent lives: Choosing the right approach to delivering the city's housing needs will help promote improvements to existing housing stock and provide adequate new housing of high build quality. The most valuable and sensitive green spaces will also be protected from inappropriate development. The new

Local Plan will also contain specific policy promoting improvements to health and wellbeing including improvements to health inequalities and life expectancy.

- Making Coventry an attractive and enjoyable place to be: Choosing the right approach to delivering the city's housing needs will strike the correct balance that provides enough new homes for local people, whilst protecting the most valuable and sensitive areas of green space from inappropriate development
- Providing a good choice of housing: Choosing the right approach to delivering the city's housing needs will ensure that sufficient new homes are provided to meet the needs of local people
- Making places and services easily accessible: Choosing the right approach to delivering the city's housing needs will, in practical terms, ensure that the right amount of new development happens to ensure that services are viable and accessible. The Local Plan will also promote sustainable development with adequate provision of infrastructure and improved accessibility to key services and facilities.
- Encouraging a creative, active and vibrant city: The New Local Plan will promote a city centre first policy, establishing the centre as the hub for new retail, leisure and community investment. Choosing the right approach to delivering the city's housing needs will, in practical terms, ensure that the right amount of new development happens to ensure that new and existing services are viable and accessible.
- Developing a more equal city with cohesive communities and neighbourhoods: One of the benefits of choosing the right approach to delivering the city's housing needs will be that more people will be adequately housed, with greater access to new jobs, leisure provisions and community facilities.
- Improving the environment and tackling climate change: Choosing the right approach to delivering the city's housing needs will, in practical terms, bring about improvements to areas in need of investment, and will protect the most valuable and sensitive areas of green space from inappropriate development.

## **6.2 How is risk being managed?**

Due to the nature of this paper there are limited risks associated with this version of the Local Plan. By virtue of its nature, the paper itself seeks to minimise the risks that may arise at the next stage by engaging with key stakeholders and local people early in the process. The principle risks will become clearer at the next stage of the Local Plan following further consideration of housing growth and distribution through the Duty to Cooperate.

## **6.3 What is the impact on the organisation?**

No direct impact.

## **6.4 Equalities / EIA**

The Council will be undertaking a full Equality and Consultation Analysis (ECA) on the New Local Plan as it is developed over the coming months. The period of community and stakeholder engagement, due to start in September, will inform the ECA and enable the impact of the new Local Plan on key protected groups in the city to be fully understood and considered by elected members prior to finalisation of the Plan.

Notwithstanding, and regardless of the level of housing to be delivered or the geographical distribution of it, there are likely to be significant economic and social benefits to the city through the development of new homes and employment opportunities in Coventry. This will be promoted by urban regeneration and the redevelopment of land currently sitting vacant and derelict as well as increased opportunities for job creation and the delivery of new infrastructure.

## **6.5 Implications for (or impact on) the environment**

At this point, there are expected to be some environmental impacts brought about by the level of housing outlined in this report and the likely need to release land from the Green Belt to meet the development needs of the city. The Local Plan does however contain commitments to protecting the city's highest value and most sensitive green spaces. Detailed assessment of these issues can be found in the Sustainability Appraisal Report (SA/SEA) that will be made available alongside this version of the Local Plan and will help inform community and stakeholder engagement.

## **6.6 Implications for partner organisations?**

There are no implications for partner organisations that cannot be mitigated or managed through the supporting work that has already been undertaken and will be prepared by the Council as it moves towards the final version of its new Local Plan.

There will however be potential implications for the Council's neighbouring authorities as part of the Duty to Cooperate. The extent of these impacts will largely depend upon the distribution of housing growth and how the respective authorities prepare their own Local Plans. These impacts are however expected to be minimised through the on-going development of a shared and consistent evidence base and will be considered through an active, constructive and on-going process as part of the Duty to Cooperate.

**Report author(s):****Name and job title:**

Mark Andrews, Acting Planning Policy Manager

**Directorate:**

Place

**Tel and email contact:**

Tel: 02476 834295

Email: mark.andrews@coventry.gov.uk

Enquiries should be directed to the above person.

<b>Contributor/approver name</b>	<b>Title</b>	<b>Directorate or organisation</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				
Jim Newton	Acting Head of Planning	Place	25/07/14	01/08/14
Colin Knight	Assistant Director (Planning Transportation & Highways)	Place	25/07/14	29/07/14
Lara Knight	Governance Services Team Leader	Resources	25/07/14	30/07/14
<b>Names of approvers for submission:</b> (officers and Members)				
Helen Williamson	Lead Accountant Business Partner (Place)	Resources	25/07/14	28/07/14
Helen Lynch	Place & Regulatory Team Manager (Legal Services)	Resources	25/07/14	04/08/14
Jasbir Bilen	Human Resources Manager	Resources	25/07/14	28/07/14
Martin Yardley	Executive Director, Place	Place	04/08/14	05/08/14
Councillor K Maton	Cabinet Member (Business, Enterprise and Employment)	Place	04/08/14	05/08/14

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