

Cabinet
Council

7th March 2017
14th March 2017

Name of Cabinet Member:

Cabinet Member for Community Development – Councillor Bigham

Director Approving Submission of the report:

Executive Director Place

Ward(s) affected:

All

Title:

Proposed Modifications to the Coventry City Council Draft Local Plan and City Centre Area
Action Plan

Is this a key decision?

Yes.

The proposals in the report are likely to have an impact on all wards across the city as they relate to the City's new emerging Local Development Plan and City Centre Area Action Plan.

Executive Summary:

The Coventry Draft Local Plan and City Centre Area Action Plan were submitted to the Secretary of State (SoS) on 1st April 2016. Following its submission, the SoS appointed an independent Inspector – Rebecca Phillips – to oversee the public examination of the Plans and their evidence base. The public examination hearing sessions took place between July 2016 and January 2017. Following this examination process the Inspector has now indicated that the Council should consult on proposed modifications in order to ensure both Plans can be considered 'sound' in accordance with the Town and Country Planning (Local Planning) (England) Regulations (2012). The majority of the proposed modifications are minor in their nature and none of them fundamentally affect either Plan or their overall objectives or direction. The vast majority of proposed changes reflect Action Points raised by the Inspector during the hearing sessions or consultation responses received during the statutory period of consultation in early 2016. Indeed, proposed modifications can only reflect changes to the Plan that make technical or factual corrections, respond to consultation responses or issues that have been raised during the examination process. For example:

- The introduction sections to both Plans are updated to reflect the movement of Plans from consultation stages to possible adoption;
- Although the most recent national data continues to show the city's housing need is increasing this is offset by need across Warwickshire falling. As such, need at the Coventry and Warwickshire level remains stable with no significant change. This is explained within the proposed modifications;

- A review mechanism is added to the Plan should any issues arise with delivery of new development or a fundamental failing of either Memorandum of Understanding (MOU);
- A new Masterplan principles policy is added to guide new development proposals with a specific focus on sites at Whitley, Keresley and Eastern Green;
- The threshold for Health Impact Assessments increases to 150 dwellings and sites over 5ha. This reflects national legislation;
- References to Jaguar Land Rover (JLR), its supply chain and the Universities are strengthened to highlight their importance to the local economy;
- The list of proposed site allocations remains unchanged although some small adjustments to site boundaries are proposed at Keresley, Eastern Green, Cromwell Lane, London Road / Allard Way and the Browns Lane Nursery Site (Appendix 3);
- Infrastructure requirements and considerations for site allocations are strengthened and clarified – especially around highway improvements. This is also reflected in an updated Infrastructure Delivery Plan;
- The new Parish Council status at Finham is recognised;
- The threshold for retail impact assessments is increased to 1,000sq.m;
- Additional references are added to strengthen the protection of ecology and biodiversity value as well as overall green infrastructure;
- The management of Local Green Space is strengthened within Policy GB1. The boundaries for Local Green Space have also been slightly amended to reflect the presence of existing development and to correct historic cartographical errors. These are set out in Appendix 3;
- Policy GB2 is amended to reference ‘safeguarded land’ as opposed to ‘reserved land’. This relates to a small number of land parcels on the city’s southern boundary;
- Heritage policies are strengthened to reflect the city centre’s Heritage Action Zone status, with additional clarification added around the Heritage Park proposals;
- Additional clarity is added around transport infrastructure and the links to regional strategies such as Midlands Connect. Additional references are also added to strengthen the importance of public transport provisions and city wide connectivity;
- Flood risk, drainage and water resources policies have been strengthened in partnership with the Environment Agency. This reflects the most up to date national guidance;
- References to deculverting are increased with such proposals being encouraged where appropriate and viable;
- A new policy is to be added to cover non-mineral developments within mineral safeguarding areas. This will ensure consistency with national guidance; and
- Both monitoring frameworks have been updated to ensure appropriate indicators and targets are identified.

Recommendations:

The Cabinet is requested to recommend that the Council:

- 1) Approves the Proposed Modifications to the "Local Plan Publication Draft (2011-2031)" and the "City Centre Area Action Plan Publication Draft (2011-2031)";
- 2) Authorises a period of statutory public consultation beginning on 15th March 2017 and ending on 28th April 2017; and
- 3) Delegates authority to the Executive Director of Place, in consultation with the Cabinet Member for Community Development, the Chair of Scrutiny Coordination Board and the Chair of Planning Committee, to take full account of the responses received to the statutory period of public consultation, propose any further minor amendments to both Plans (where this is necessary to correct any errors and aid clarity) and submit the Plans back to the Secretary of State’s nominated Inspector for her final consideration.

The Council is recommended to:

- 1) Approve the Proposed Modifications to the "Local Plan Publication Draft (2011-2031)" and the "City Centre Area Action Plan Publication Draft (2011-2031)";
- 2) Authorise a period of statutory public consultation beginning on 15th March 2017 and ending on 28th April 2017; and
- 3) Delegate authority to the Executive Director of Place, in consultation with the Cabinet Member for Community Development, the Chair of Scrutiny Coordination Board and the Chair of Planning Committee, to take full account of the responses received to the statutory period of public consultation, propose any further minor amendments to both Plans (where this is necessary to correct any errors and aid clarity) and submit the Plans back to the Secretary of States nominated Inspector for her final consideration.

List of Appendices included:

Appendix 1: Schedule of proposed modifications to the draft Local Plan – presented as a tracked change version of the original Publication Draft (January 2016).

Appendix 2: Schedule of Proposed Modifications to the draft City Centre Area Action Plan (AAP) – presented as a tracked change version of the original Publication Draft (January 2016).

Appendix 3: Inset maps showing the proposed adjustments to the draft Local Plan Policies Map.

Background papers

None

Other useful documents:

The initial Publication Drafts of the Local Plan and City Centre Area Action Plan were considered at Council on the 12th January 2016. The Coventry and Warwickshire Housing Requirements Memorandum of Understanding was also agreed at the same meeting. All papers are available under agenda items 109, 111 and 112 via the following link:

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=130&MId=10701&Ver=4>

A summary note of all responses received to this period of consultation as provided to Scrutiny Board 3 at its meeting on the 16th March 2016. All papers are available under agenda item 39 via the following link:

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=570&MId=10808&Ver=4>

Full coverage of all consultation responses received during this period are available under reference LP16 via the following link:

http://www.coventry.gov.uk/downloads/download/4070/coventry_local_plan_2016

The Coventry and Warwickshire Employment Land Memorandum of Understanding was considered at Council on the 11th October 2016. All papers are available under agenda item 63 via the following link:

<http://democraticservices.coventry.gov.uk/ieListDocuments.aspx?CId=130&MId=11139&Ver=4>

The Coventry and Warwickshire review of the 2014 based sub-national population projections and household projections is available via the following link:

http://www.coventry.gov.uk/downloads/file/21921/lp231_cw_2014-based_projections

Has it been or will it be considered by Scrutiny?

A summary of responses received to the previous rounds of public engagement were reported to Scrutiny Board 3 at its meetings on the 12th November 2014 and 16th March 2016.

The responses received to this period of statutory representations will also be presented to a special meeting of Scrutiny Coordination Board and the Planning Committee in May 2017 prior to

submission back to the Secretary of State's nominated Inspector. This will help to inform the delegated process referred to in recommendation 3 to Cabinet and Council.

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

A summary of the proposed modifications and the Inspectors relating Action Points have been presented to the Coventry Local Plan Advisory Panel.

Will this report go to Council?

Yes, 14th March 2017

Report title: Proposed Modifications to the Coventry City Council Draft Local Plan and City Centre Area Action Plan

1. Context (or Background)

1.1 The Coventry Draft Local Plan and City Centre Area Action Plan (AAP) were submitted to the Secretary of State (SoS) on 1st April 2016. This followed a period of statutory public consultation in January and February 2016. Following its submission, the SoS appointed an independent Inspector – Rebecca Phillips – to oversee the public examination of the Plans and their evidence base. The public examination hearing sessions took place over 3 stages in July and October 2016 and January 2017. Following this examination process the Inspector has now indicated that the Council should consult on proposed modifications in order to ensure both Plans can be considered ‘sound’. The process of consulting on proposed modifications is governed by regulations 19-22 of the Town and Country Planning (Local Planning) (England) Regulations (2012). The majority of the proposed modifications are minor in their nature and none of them fundamentally affect either Plan or their overall objectives or direction. The vast majority of proposed changes reflect action points raised by the Inspector during the hearing sessions or consultation responses received during the statutory period of consultation in early 2016. Indeed, proposed modifications can only reflect changes to the Plan that make technical or factual corrections, respond to consultation responses or issues that have been raised during the examination process. The sections below reflect the different sections of the Local Plan and AAP and summarise the proposed modifications accordingly.

1.2 Introductory Section

This section of the Plan is updated to progress the Draft Plan from a consultation document to one that can be adopted and used for determining planning applications. As such, it updates the context around the Duty to Cooperate and removes aspects that focused on consultation arrangements.

1.3 Development Strategy

1.3.1 On the first day of the Local Plan examination the Office for National Statistics (ONS) and Department for Communities and Local Government (DCLG) published new data around population and household projections. This data was assessed in partnership with our Warwickshire neighbours to understand if it had any impact on the growth proposals within the Draft Local Plan. The assessment showed that the city’s need continues to rise but that it is more than offset by a fall in need within Warwickshire. As such, the overall need of the Housing Market Area (Coventry and Warwickshire) falls by approximately 35 homes a year. Due to the insignificance of such a change (less than 1% of total need) it is not felt appropriate to amend the Plan or the Housing Requirements Memorandum of Understanding (MOU). Instead this section of the Plan is amended to acknowledge this new data and its outcomes, highlighting the lack of significance the new data has on the Plan as a whole. The growth figures within the Plan are also identified as a minimum to conform with national policy.

1.3.2 The Employment Land MOU (agreed at Council in October) is also now referenced in this section of the Plan, whilst there is additional reference to the importance of key employers within the city such as JLR and the two universities.

1.3.3 Policy DS1 has been updated to add a clear review mechanism to the Local Plan. This review mechanism will be triggered should the Plan not deliver the homes, jobs and infrastructure it sets out or if one of our neighbouring authorities is proven to be unable to accommodate the city’s unmet need as identified through the MOU. To be proven this will need to be tested through public examination of the respective Plan. Notwithstanding the

potential triggers, the proposed amendment to Policy DS1 also commits to a report being presented to Council by March 31st 2021 which reviews the Plan's progress, its evidence base and its Duty to Cooperate aspects to determine whether or not a Plan review is required. Such a review could be of the Plan as a whole or in part. This review mechanism has been designed in partnership with neighbouring authorities and will be broadly consistent across Coventry and Warwickshire.

- 1.3.4 Policy DS2 is updated to clearly identify sites and schemes where cross boundary cooperation will be important. This includes the growth around Whitley Business Park, Warwick University and Ansty Park amongst others.
- 1.3.5 At the request of the Inspector a new policy is proposed to cover Masterplan Principles. This is included as Policy DS4 (Parts A-D). Part A covers a wide range of principles that will be applied to all proposed site allocations and any other major development. Part B relates specifically to the growth around Whitley Business Park, Part C relates to the proposed Sustainable Urban Extension (SUE) at Keresley and Part D to the proposed SUE at Eastern Green. The latter 3 parts of the policy major on the importance of infrastructure including highway provisions, public transport and green infrastructure (including biodiversity and ecology management).

1.4 Health and Wellbeing

The explanatory text to Policy HW1 is proposed to be amended to reflect a range of consultation responses and the Inspector's recommendations. This is primarily linked to the threshold at which Health Impact Assessments (HIA's) will be required to support planning applications. This mainly effects residential developments and increases the threshold from 0.5ha and 10 dwellings to 5ha and 150 dwellings. This reflects the government's new Environmental Impact Assessment Guidance and will be consistent with Rugby Borough Council's proposals. To offset this change though additional text is to be added to strengthen the links with other Plan policies on air quality, green spaces and active travel. A recommendation is also added to make use of the evolving Birmingham City and Public Health England HIA toolkit which is expected to be rolled out across the Combined Authority area later this year.

1.5 Jobs and Economy

Small adjustments are proposed to policies and supporting text which add further support for some of the city's key employers – most notably JLR, its supply chain and both universities. The employment land delivery and supply position is also updated to reflect the most up to date data.

1.6 Delivering Coventry's Housing Needs

- 1.6.1 Following a range of consultation responses and the Inspector's recommendations, the housing section has been amended to clarify how future land supply will be calculated and recorded. This will ensure a consistent approach is managed for planning applications and in light of any potential appeals. It will also support the Plan's annual monitoring approach. The current housing land supply position is also updated to reflect the most up to date data.
- 1.6.2 Table 4.2 of the Plan, which forms part of Policy H2 identifies the site allocations for new homes. Despite a number of additional sites being proposed during the examination process, the list of sites remains unchanged although some small adjustments to site boundaries are proposed at Keresley, Eastern Green, Cromwell Lane, London Road / Allard Way and the Browns Lane Nursery Site (Appendix 3). These adjustments reflect previous cartographical errors and consultation responses to the Plan and have been considered through the examination process. They make no impact on the amount of Green Belt land that is to be developed through this Plan. Amendments are proposed

however to the list of essential requirements. This is with a view to strengthening the links to necessary infrastructure and highlighting key areas of consideration for the planning application stage. Proposed modifications in this regard relate to the proposed allocations at Keresley, Eastern Green, Walsgrave Hill Farm, Browns Lane, Sutton Stop, Cromwell Lane, London Road / Allard Way and Grange Farm. Additional clarification around transport infrastructure delivery is also added in to ensure consistency with national guidance and allow sustainable delivery of infrastructure where necessary and appropriate.

- 1.6.3 Policy H6 is to be amended to be more explicit about development viability being a consideration when planning for affordable homes.
- 1.6.4 The supporting text for policy H7 is to be updated in relation to how the city meets its needs for Gypsy and Traveller sites. The policy remains unchanged, but should adequate provisions not be forthcoming in the coming years and/or recent patterns of illegal encampments indicate a consistent departure from long term trends then this may prompt a targeted review of the Plan in order to provide additional sites.
- 1.6.5 The supporting text to Policy H8 has been amended to remove reference to lifetime homes as this has now been overtaken by changes to national guidance.
- 1.6.6 Policy H11 has also been adjusted to add clarity about both large and small HiMO's being monitored, whilst an additional consideration is to be added to the policy. This will ensure the policy takes into account the amenity value of the property for future occupants around room sizes and garden space.

1.7 Retail and Town Centre Uses

- 1.7.1 The primary adjustment to this section of the Plan is to ensure the policy and requirements are clear and fully reflective of the evidence base. To ensure this is the case retail based floor space requirements are to be split by use class, which means existing tables are to be subdivided. The end requirements remain unchanged.
- 1.7.2 The threshold for impact assessments (for out of centre retail proposals) is to be increased from 400sq.m to 1,000sq.m, which reflects one of the Inspector's Action Points. This has regard to the average size of existing out of centre units around Coventry. As such, it responds to a review of local evidence and remains below the national threshold of 2,500sq.m.

1.8 Communities

The only modification to this section is to ensure the new Parish Council at Finham is recognised alongside those at Keresley and Allesley.

1.9 Green Belt and Green Environment

- 1.9.1 Additional criteria is to be added to Policy GB1 alongside extra supporting text, which will ensure the policy is clear about how Local Green Space will be managed. This confirms that the creation of small buildings and structures will be acceptable, but only where they are ancillary to the primary use of the land as green space. For example, this could include sports changing rooms, play equipment or appropriate lighting. Additional supporting text is also to be added to strengthen the intention of new areas of Local Green Space being designated within key sites such as Whitley, Keresley, Eastern Green, London Road / Allard Way and as part of the Heritage Park. The integrity of the Local Green Space designation has also been enhanced by removing areas of existing built development (such as schools, sports centres and homes). Opportunity has also been taken to correct a small number of historic cartographical errors with the proposed boundary lines. Maps of these adjustments are included within Appendix 3. This has no

impact on the amount of green space that is to be protected through the Local Plan or the amount of land to be lost to development.

1.9.2 Policy GB2 is also to be amended which will define the small number of Green Belt parcels along the city's southern boundary as safeguarded land instead of reserved land. This ensures consistency with national guidance and responds to the Inspector's action points. It does mean though that the next Local Plan will need to consider the future policy basis for these areas having regard to any developments that are brought forward by Warwick District Council on the adjoining land.

1.9.3 Policies GE1-GE4 are proposed for minor amendment to reflect consultation responses and discussions with The Environment Agency, Natural England and Warwickshire Wildlife Trust amongst others. Such changes also reflect the Inspector's action points. The purpose of these changes is to strengthen further the importance and protection of ecology and biodiversity value as well as overall green infrastructure.

1.10 Design

The only minor adjustment to Policy DE1 is to add additional reference to ensuring public transport provisions are integrated into new sites where appropriate to do so.

1.11 Heritage

The primary adjustment to this section focuses on Policy HE3. This policy has been developed in partnership with Bluecoats School and the Charterhouse Trust and clarifies the position around how the heritage park will be delivered and how the future expansion of the school can be supported. It also brings into the policy the specific requirement for a comprehensive Masterplan developed in partnership with both parties alongside the city council and local community.

1.12 Accessibility

Joint working with colleagues at Transport for West Midlands (TfWM) has led to a number of minor proposals throughout this section of the Plan which strengthen the links and commentary around regional transport plans, public transport and regional connectivity. Additional technical information has been added regarding the most recent transport modelling and references to SPRINT have been removed to reflect on-going work through the Combined Authority.

1.13 Environmental Management, Minerals and Waste

1.13.1 Additional reference is proposed to be added to Policy EM1 with regards blue infrastructure, whilst Policy EM2 is amended to include reference to the city's coal mining legacy.

1.13.2 Policy EM4 and EM5 are proposed to be amended following engagement with the Environment Agency. This ensures both policies will appropriately reflect the most up to date flood risk and mitigation information and guidance available nationally. Further to this, a new Policy (Policy EM6) is proposed to cover groundwater management and drainage on previously developed land.

1.13.3 The amended Policy EM8 – waste management is then strengthened again in discussion with the Environment Agency whilst a new policy (EM10) is added to cover non-mineral development within Mineral Safeguarding areas. This is to ensure that new development does not unnecessarily sterilise possible mineral extraction and is consistent with national guidance.

1.14 Connectivity – Telecommunications, Broadband and Mobile Internet

There are no proposed modifications to this section.

1.15 Infrastructure Delivery, Implementation and Monitoring

The Inspector's action points require additional clarification be added to Policy IM1 in order to highlight the importance of certain infrastructure proposals relative to others. This will see specific infrastructure projects deemed as category 1 proposals within the Infrastructure Delivery Plan (IDP). For clarity, additional reference is added to the Combined Authority and Devolution Deal proposals as well as continued cross boundary working on infrastructure projects.

1.16 Infrastructure Delivery Plan (IDP)

The IDP is a live document and is appended to the draft Local Plan. This has been enhanced following the examination process with an additional section added around cross boundary infrastructure as well as additional clarity around timing, costs and triggers for infrastructure projects. It also reflects the updated Station Masterplan and Combined Authority proposals.

1.17 Monitoring Framework

The monitoring frameworks are live documents appended to the draft Local Plan and City Centre AAP. These set out how both plans will be monitored on an annual basis. Following the examination process both monitoring frameworks have been updated to reflect new indicators and targets.

1.18 City Centre Area Action Plan

1.18.1 The introductory section of the AAP is proposed to be updated in the same way as the draft Local Plan.

1.18.2 The proposed amendments to the retail based requirements set out in the draft Local Plan are also reflected within the AAP. This does not change the overall policy approach for new retail developments to be focused within the city centre.

1.18.3 Additional supporting text is added to the Heritage section to reflect on-going work with Historic England as well as make reference to the city centre obtaining Heritage Action Zone Status. This is also reflected by additional reference within the supporting text to Policy CC14 – the Civic Area.

1.18.4 A number of small adjustments are proposed to Policy CC8 and CC9 and supporting text in various parts of the AAP to reflect the updated flood risk and drainage policies in the draft Local Plan. This reflects the Council's on-going work with the Environment Agency and the most up to date national guidance. It also helps to support further encouragement for deculverting within the city centre wherever this is appropriate and viable.

1.18.5 Continued engagement with TfWM has led to a small number of adjustments to Policy CC11 and its supporting text to strengthen links to sub-regional and regional public transport and cycle networks. This also strengthens further the importance of local connectivity.

2. Options considered and recommended proposal

2.1 At this stage of Plan preparation there are only 2 realistic options available to the Council.

2.2 The first of these options is set out in the recommendations to this report. This would see a further round of statutory consultation on the proposed modifications to both Plans. These proposed modifications primarily respond to the action points identified by the

Inspector during the examination period which have, in part at least, been informed by both written and verbal representations made to the Plans and the Hearing Sessions. The Inspector has indicated that without such modifications the Plans cannot be found sound and could not therefore be adopted.

- 2.3 As such, the second option would be to not consult on the proposed modifications, withdraw the Plans from the examination process and start work on new Plans. This option is not recommended as it would mean the Council being without an up to date Development Plan for at least another 3 years and incur further significant costs in preparation and examination time. Being without a Development Plan for this time period would significantly increase the risk of planning by appeal, having little or no control over planning within its own administrative boundaries. Indeed, central Government have indicated that they may step in and produce Plans themselves on behalf of Local Authorities who do not have an up to date Plan in place by 2017. Furthermore, and having regard to the work undertaken with neighbouring authorities in the preparation of the current draft Development Plan to date, this option would also raise significant risks and concerns over the Duty to Cooperate process.

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 various times in the last ten years. Likewise, the City Centre AAP has been subject to previous rounds of consultation dating back to 2010 with results of such consultation reported accordingly.
- 3.2 This process culminated in the statutory period of public consultation between January and February 2016 which focused on the proposed Local Plan and the City Centre AAP. A full Equalities and Consultation Assessment was undertaken at this time to support this consultation. With regards the draft Local Plan approximately 740 responses were received from local communities, local business, professional organisations and key stakeholders, with additional views and opinions expressed and recorded at Ward Forums and drop in sessions. This showed that the greatest area of objection was around potential development within the city's Green Belt, most notably at Keresley, Eastern Green, Cromwell Lane and Baginton Fields. With regards the City Centre AAP approximately 400 responses were received from local communities, local business, professional organisations and key stakeholders, with additional views and opinions expressed and recorded at Ward Forums and drop in sessions. This showed that the greatest area of concern was around the growth of Coventry University, however there was also significant levels of support for regenerating the city centre.
- 3.3 The responses received during this period were presented to a special meeting of Scrutiny Board 3 and Planning Committee in March 2016.

4. Timetable for implementing this decision

- 4.1 Subject to approval by Cabinet and Council, the proposed modifications to both the draft Local Plan and City Centre AAP will be published for a period of 6 weeks and 3 days statutory consultation. The additional 3 days reflect the period covering the Easter Bank Holidays.
- 4.2 All responses to this period of statutory consultation will then be presented to a special meeting of the Scrutiny Coordination Board and Planning Committee for their consideration, with additional approval from the executive Director for Place and the

Cabinet Member for Community Development (which reflects recommendation 3 to both Cabinet and Council). Subject to this approval, the proposed modifications and the consultation responses will be provided back to the Secretary of State's nominated Inspector for her final consideration. This is expected to occur before the end of May 2017. It is then anticipated that the Inspector will release her final report allowing the Council to move forward and adopt both Plans. It is hoped the Inspector's final report will be presented to Council at its meeting in August or September 2017.

5. Comments from the Director of Finance and Corporate Services

5.1 Financial implications

The primary costs associated with this process include the publication of the documents for representations and the costs of public consultation. These are considered to be minimal and will be funded from existing budget provisions.

The preparation of both Plans to date however has incurred significant costs through the development and examination process. Whilst the cost of developing the Plans has already been covered through previous annual budgets, the cost of the examination process is yet to be realised. Money is set aside within Council Reserves however to meet the anticipated examination costs, which will only be fully known and invoiced for at the end of the examination process. This is expected within the 2017/18 financial year.

5.2 Legal implications

The development of both Plans and the consultation period on the proposed modifications reflects the statutory requirements set out in the Planning and Compulsory Purchase Act 2004, the Localism Act 2011, the Town and Country Planning Act 1990 and other associated regulations, the National Planning Policy Framework (2012), and Planning Policy Guidance (2014). This also reflects the Council's adopted Statement of Community Involvement.

The progress to date through public examination and the Inspector's direction to consult on proposed modifications is a strong indication that both Plans have been found to be legally compliant in accordance with the above legislation. This also indicates that the Council has appropriately discharged its responsibilities under 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).

The provisions of the Planning & Compulsory Purchase Act 2004 and Localism Act 2011 set out the relevant provisions governing the matters raised in this report, including that the Council has a duty to have a development plan.

The proposed consultation period will help to ensure that the Council can demonstrate that it has continued to consider all reasonable alternatives when considering its approach to developing its Local Plan and City Centre AAP, and that it has continued to involve the local community and others with an interest in the process.

Once adopted by the Council, the Local Plan and the City Centre AAP will become the starting point for determining any planning applications that are submitted to the Council for consideration.

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: The plans have sought to deliver a range of opportunities to deliver new homes and employment land across the city for the next 15-20 years. This will help to ensure that sufficient new homes are provided to meet the needs of local people and sufficient jobs are created and facilitated. It will also help ensure that businesses are not deprived of staff through a lack of housing and land opportunities;
- Citizens living longer, healthier, independent lives: Choosing the right approach to delivering the city's housing, employment, retail and infrastructure needs will help promote improvements to the existing built environment. The most valuable and sensitive green spaces will also be protected from inappropriate development. Both Plans 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, employment, retail and infrastructure needs will help promote improvements to the existing built environment. This will also create opportunities for the city centre to develop and regenerate supporting increased tourism and ensuring the most valuable and sensitive green spaces will also be protected from inappropriate development.
- Providing a good choice of housing: In partnership with neighbouring authorities both Plans make provisions to fully meet the city's housing needs. This will ensure that sufficient new homes are provided to meet the needs of local people within the Housing Market Area.
- Making places and services easily accessible: New homes and job opportunities will be brought forward in a planned and sustainable way. In practical terms this will help ensure the right amount of new development happens to ensure that services are viable and accessible. Both Plans 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: Both Plans promote a centres first policy, establishing designated centres as the hub for new retail, leisure and community investments within their surrounding communities. New homes and job opportunities will be brought forward in a planned and sustainable way. In practical terms this will help ensure the right amount of new development happens to ensure that services are viable and accessible.
- Developing a more equal city with cohesive communities and neighbourhoods: By planning proactively for the city's housing and employment needs both Plans can help to ensure 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: The Plans proactively seek to mitigate the impacts on the environment brought about by development and include specific policy on combating climate change. The Plans will help 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?

Issues of potential risk, such as the Duty to Cooperate, have been carefully managed throughout the development of both Plans. This period of statutory consultation on the proposed modifications of the Plans will further reduce any risk associated with their soundness.

6.3 What is the impact on the organisation?

No direct impact.

6.4 Equalities / EIA

A full Equality and Consultation Assessment (ECA) was undertaken as part of previous Local Plan and City Centre AAP engagement processes. These were updated to reflect the statutory consultation period in January 2016 and formed part of the Council's submission to the Secretary of State. This stage of the consultation process focuses on modifications to the Plans that do not fundamentally impact on the aims, objectives and direction, therefore a further update of the ECA has not been deemed appropriate at this stage. As part of developing its ECA considerations therefore the Council has had due regard to its public sector equality duty under section 149 of the Equality Act 2010.

In summary, there will 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

A detailed assessment of potential environmental implications and issues has been undertaken as part of the Sustainability Appraisal Report (SA/SEA) for both the draft Local Plan and the City Centre AAP. These reports have been consistently available as part of all periods of engagement and consultation. Furthermore a separate update of the supporting SA/SEA reports has been prepared to specifically consider the modification proposals and will help to inform community and stakeholder engagement.

In summary this highlights potential increases in carbon emissions and air quality issues generated by new developments and an increased population. There are also accepted environmental impacts brought about by the proposed development of Green Belt land, however the provision of new green and blue infrastructure as part of such development is likely to support increased biodiversity and quality of space. The plan also encourages climate change adaptation and the provisions of renewable energy and energy efficient buildings. The proposed modifications to both Plans also strengthen the policy platform around drainage and flood risk in accordance with the latest Environment Agency advice.

6.6 Implications for partner organisations?

Partner organisations, notably neighbouring Councils and the Local Enterprise Partnership, will be impacted because they have a responsibility to formally engage with the Council with respect to strategic matters such as the Local Plan and AAP. This is to discharge the Duty to Cooperate, as described by the Localism Act 2011 and NPPF. Of principle impact in this respect is the need for neighbouring authorities to plan for the city's unmet housing and employment land needs within their respective authority areas. This is also expected to have implications for strategic infrastructure. All issues are expected to be mitigated by the on-going work between the seven Coventry and Warwickshire authorities as evidenced by the recent Memorandum of Understanding on housing and employment requirements and continued development of respective plans.

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Tracy Miller	Head of Planning and Regulatory Services	Place	27/01/2017	03/02/2017
Andrew Walster	Assistant Director (Street Scene and Regulatory Services)	Place	27/01/2017	06/02/2017
Lara Knight	Governance Services Co-ordinator	Resources	27/01/2017	06/02/2017
Names of approvers for submission: (officers and members)				
Finance: Phil Helm	Finance Manager (Place)	Resources	27/01/2017	31/01/2017
Legal: Sam McGinty	Place Team Leader	Resources	27/01/2017	02/02/2017
HR: Myran Larkin	Senior HR Advisor	Resources	27/01/2017	08/02/2017
Executive Director: Martin Yardley	Executive Director (Place)	Place	08/02/2017	09/02/2017
Members: Cllr Linda Bigham	Cabinet Member for Community Development	Place	08/02/2017	14/02/2017

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Appendices