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Cabinet	01 <sup>st</sup> December 2020
Council	08 <sup>th</sup> December 2020

**Name of Cabinet Member:**

Cabinet Member for Housing and Communities – Councillor D Welsh

**Director Approving Submission of the report:**

Director of Streetscene and Regulatory Services

**Ward(s) affected:**

All

**Title:**

Review of Local Plan

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**Is this a key decision?**

Yes - the proposals affect more than two electoral wards

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**Executive Summary:**

Policy DS1 of the Local Plan commits the Council to review certain triggers before March 2021 which, if met, would lead to a review of the current Local Plan. This report reviews these triggers and recommends that there is no requirement to commence a Plan Review in March 2021.

**Recommendation:**

The Cabinet is requested to:

- 1) Note the assessment of the Plan Review triggers
- 2) Recommend that Council approves that there is no requirement to commence a Plan Review in March 2021 as a result of the triggers set out in Policy DS1 of the Local Plan

Council is requested to:

- 1) Note the assessment of the Plan Review triggers
- 2) Approves that there is no requirement to commence a Plan Review as a result of triggers set out in Policy DS1 of the Local Plan

**List of Appendices included:**

Appendix 1 – Local Plan Policy DS1 and explanatory text

**Background papers:**

None

**Other useful documents**

None

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

No

**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 – 8<sup>th</sup> December 2020

**Report title:**

Review of Local Plan

**1. Context (or background)**

- 1.1. The Local Plan was adopted in December 2017 and included, within policy DS1, the following provision;

*“3. The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before 31st March 2021 to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on that review will commence immediately.”*

The full text of the policy and its explanatory notes is included in Appendix 1.

- 1.2. With the conclusion of the most recent housing and employment monitoring, it is an appropriate juncture to review the triggers set out in DS1 to determine whether a review of the Plan is appropriate.

**1.3. National Policy**

1.3.1. Since the adoption of the Local Plan in 2017 the National Planning Policy Framework (NPPF) has undergone revision, the most recent version of which is dated February 2019. By itself this is insufficient to trigger a review, and analysis was undertaken regarding the extent of the changes to the NPPF and the subsequent impact on the adopted Plan.

1.3.2. Whilst the NPPF revisions provide updated provisions and guidance, there are no material changes that result in the current Plan being rendered unsound; it is therefore not considered appropriate to commence a review on this basis.

1.3.3. Since Plan adoption the government has introduced a Standard Methodology which Councils are obliged to use when calculating housing requirements, replacing the method that was used in the Local Plan. This Methodology takes the official government population projections produced by the Office of National Statistics (ONS) and applies a multiplier to them based on average affordability in the City.

1.3.4. Any plan review would need to use this Methodology as a basis for calculating housing need, and then add any additional modifiers driven through previous under-delivery, supporting economic growth or other drivers for additional growth. As the Methodology uses the same ONS population projection principles as the Local Plan there are no significant changes to the growth pattern of the city and sub-region as a result.

1.3.5. The most recent ONS population projections (currently the 2018 projections, released in Summer 2020) would need to be input into the Standard Methodology when conducting a review. These projections show a slight increase in growth over the plan period when compared to the 2012 projections used at plan-making stage. This additional growth is not considered significant enough to trigger a review but will need to be accommodated in any future review, as has been the case in neighbouring authorities where emerging Local Plans have been asked

to demonstrate their ability to accommodate the most recent population projections.

- 1.3.6. A recent government consultation proposed a revision to the Standard Methodology which proposed a significant increase in housing requirement. As there is no established timeline for the review of the consultation responses, or any subsequent changes to the planning system, it is not considered appropriate to delay a decision on Coventry's Plan Review.
- 1.3.7. In addition, there has also been recent public consultation on the future nature of the planning system (Planning for the Future White Paper). Whilst the proposals in the White Paper would constitute a radical change rendering a review, or wholesale new Plan, required there has only been an opening consultation conducted, with several years of further consultation and legislation required before the White Paper is enacted. It is therefore not considered appropriate to commence a Review based on this.
- 1.3.8. The consultations referred to in 1.3.6 and 1.3.7, and the City Council's responses were considered by Council on 13<sup>th</sup> October 2020 and these can be found at <https://edemocracy.coventry.gov.uk/ieListDocuments.aspx?CId=124&MId=12245>.

#### 1.4. Regional context

- 1.4.1. The explanatory text to Policy DS1 makes clear that the Regional triggers refer to the progress of neighbouring authorities in delivery of the City's unmet employment and housing need. The agreement to the delivery of the City's unmet need is shared with neighbouring Warwickshire authorities as part of the Memorandum of Understanding. Significant under delivery may contribute to the need for a Plan Review.
- 1.4.2. A review of neighbouring authority Housing Delivery Test (HDT) results has taken place to assess their delivery against Local Plan targets, which include meeting Coventry's unmet need. A HDT result of 100% means that an authority is fully meeting the housing requirement set out in their Local Plan, measured over the last three years.

Authority	N. Warks	Nun & Bed	Rugby	Warwick	Stratford
HDT result	156%	98%	110%	129%	271%

- 1.4.3. The most recent data available is for the year 2018/19, as the global pandemic has hindered monitoring. As a result, government is likely to publish the most recent results during the Spring of 2021 and therefore after the point a decision is required regarding Plan Review. In addition, officers in the neighbouring authorities indicate that there are no significant changes in the monitoring results currently being processed by government and that we can be confident overall delivery will remain on track.
- 1.4.4. Employment land delivery for neighbouring authorities has also been assessed. The delivery of employment land is not centralised in the same way that housing delivery data is. However, a review of neighbouring authorities employment land delivery is shown in the following table.

Authority	N. Warks	Nun & Bed	Rugby	Warwick	Stratford
Cumulative target to 2018/19	24ha*	43.12ha	83.2ha	29.33ha	21.6ha
Cumulative delivery to 2018/19	166.25ha	9.02ha	89.4ha	14.98ha	83.2ha

\*N. Warks plan currently in Examination and so target is provisional only

1.4.5. It should be noted that the nature of employment land delivery is more erratic than housing delivery, with large allocations often being completed in single developments. It is therefore appropriate to look at the total quantum delivered in the subregion against the total target to assess whether there is a significance issue with employment land delivery. The table below is the total requirement and delivery over the plan periods of the Warwickshire authorities.

Total requirement across subregion	Total delivery across subregion
201.25ha	362.85ha

1.4.6. It is therefore clear that sufficient employment land has been delivered across the subregion and that the Regional trigger is not met.

#### 1.5. Evidence base and monitoring

1.5.1. The Council has recently completed work on the most recent monitoring year (2019/20) for the City, the detailed results of which will shortly be published as part of the Authority Monitoring Report. As this data is produced in-house, we are able to use the most recent dataset.

1.5.2. The key indicators relevant to the Plan Review triggers are housing and employment land delivery. The delivery over the plan period so far, compared to cumulative requirement are set out in the following table.

Dwellings required (2011-20)	Dwellings delivered (2011-20)
10,300	11,775
Employment land required (2011-20)	Employment land delivered (2011-20)
51ha	146.6ha

1.5.3. This clearly demonstrates that both housing and employment land delivery is above the targets set out in the Plan. As such the triggers have not been engaged and there is no requirement to commence a Plan Review.

1.5.4. There have been no material changes in the evidence base underpinning the Local Plan and therefore the second part of this trigger has not been met, and there is no requirement to commence a Plan Review in March 2021.

1.6. As a result of the above analysis it is concluded that the triggers set out in Policy DS1 have not been engaged and that there is no basis to commence a Plan Review in March 2021.

- 1.7. Two petitions were received on 02<sup>nd</sup> September 2020, requesting an urgent review of the Local Plan which will be considered by the Cabinet Member for Housing and Communities at his meeting on 27<sup>th</sup> November 2020. The petition organiser will be invited to the meeting to present the concerns of the petitioners and the outcome of the meeting reported to Cabinet.

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

- 2.1. The City Council could choose to progress with a Plan Review, irrespective of the outcomes of the assessment of the triggers in the Local Plan. Not only would this be contrary to the provisions of the Local Plan, it is deemed unnecessary at this time as the Plan is comprehensively delivering the required growth. Therefore, this option is not recommended.
- 2.2. The recommended option is to confirm the outcomes of the trigger assessment and not to commence a review in March 2021.
- 2.3. It should be noted that the National Planning Policy Framework (NPPF) requires Local Authorities to review their Local Plans every five years. We are, therefore, obliged to commence a review by December 2022 to assess whether the Plan remains a robust and sound document to deliver the growth the City requires. Work will begin in due course to ensure a thorough review of the Plan and its evidence base takes place.

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

- 3.1. This report has not been subject to consultation.

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

- 4.1. The decision will be implemented immediately.

## **5. Comments from the Director of Finance and the Director of Law and Governance**

### **5.1. Financial implications**

There are no financial implications to the recommendation.

### **5.2. Legal implications**

There are no legal implications associated with the recommendations.

## **6. Other implications**

### **6.1. How will this contribute to the Council Plan ([www.coventry.gov.uk/councilplan/](http://www.coventry.gov.uk/councilplan/))**

The submitted and proposed consultation responses contribute to the Council Plan by reiterating our desire to:

- A prosperous Coventry: The Local Plan is guiding the delivery of a prosperous Coventry, and maintaining the current plan will ensure that this continues;
- Increasing the supply, choice and quality of housing; the Local Plan is already delivering the right volume of housing, increasing choice and driving up quality, and maintaining the current Plan will ensure that this

continues;

- Making Coventry an attractive and enjoyable place to be: The provisions of the Local Plan help deliver an attractive and enjoyable city;
- Making places and services easily accessible: The current Local Plan ensures the delivery of accessible places;
- Developing a more equal city with cohesive communities and neighbourhoods: The provisions of the Local Plan help deliver cohesive communities and neighbourhoods;
- Improving the environment and tackling climate change: The current Local Plan has a range of policies covering the environment and climate change.

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

There is no risk associated with the recommendations. The Local Plan continues to deliver the growth required. Further, the Plan will be subject to a mandatory review at the end of 2022 which will allow a further assessment of the delivery and soundness of the Plan.

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

There is no direct impact on the organisation as a result of the recommendation.

## **6.4. Equality/ EIA**

A full Equality and Impact Assessment (ECA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010).

## **6.5. Implications for (or impact on) climate change and the environment**

There is no direct impact from the recommendations of the report.

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

None

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**Service**

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Michelle Salmon	Governance Services Officer	Law and Governance	05/11/2020	05/11/2020
Tracy Miller	Strategic Lead Planning and Major Development	Streetscene and Regulatory Services	05/11/2020	05/11/2020
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Cath Crosby	Lead Accountant, Business Partnering	Finance	05/11/2020	08/11/2020
Stuart Evans (ACS)	Planning and Highways, Legal Services	Law and Governance	05/11/2020	05/11/2020
Andrew Walster	Director of Street Scene and Regulatory Services	-	06/11/2020	07/11/2020
Councillor D Welsh	Cabinet Member for Housing and Communities	-	08/11/2020	10/11/2020

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