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Cabinet	15 November 2022
Council	06 December 2022

**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 Wards

**Title:**

**Local Plan Review**

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**Is this a key decision?**

Yes – significantly effects more than 2 wards in the City etc

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**Executive Summary:**

The Coventry Local Plan was adopted in 2017. The Council is obliged to consider whether the Plan needs reviewing every five years. This consideration is based on whether the Plan has been effective in meeting the policy objectives it set out, whether there have been substantive policy changes at a local or national level, or whether there has been a significant change in the housing need.

Given that the Government's "Standard Method" for calculating Housing Need was introduced after the adoption of the current plan it is considered that a significant change has occurred. Furthermore, a comprehensive review of the policies in the Plan will give an opportunity to ensure greater consideration of environmental issues as well as wider national changes.

It is therefore proposed to conduct a full review of the Local Plan, and an indicative timeline is included as part of a refreshed Local Development Scheme. Adoption of a reviewed Local Plan is anticipated to take place in early 2025.

**Recommendation:**

Cabinet is requested to;

- 1) Note the timeline indicated in the Report.
- 2) Recommend that Council approve the commencement of a full Local Plan Review.
- 3) Adopt the draft Local Development Scheme 2022-2025.

Council is recommended to;

- 1) Note the timeline indicated in the Report.
- 2) Approve commencement of a full Review of the Local Plan.

**List of Appendices included:**

Appendix 1: Draft Local Development Scheme 2022-2025

**Background papers:**

Cabinet 1 December 2020, Item 47

**Other useful documents**

2017 Local Plan

**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?**

Yes – Cabinet Advisory Panel – Local Development Plan – 12 October 2022

**Will this report go to Council?**

Yes – 6 December, 2022

## **Report title: Local Plan Review**

### **1. Context (or background)**

- 1.1. Local Plans must be considered for review at least once every five years, as laid out in Paragraph 33 of the National Planning Policy Framework:

“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary”

- 1.2. Paragraph 33 further states that:

“Reviews should be completed no later than five years from the adoption date of a plan”

Recognising the importance of the results of the 2021 Census, Members determined at Cabinet on 1 December 2020 that Plan Review should only come forward once this data was able to be incorporated into a decision. The report before Members is the earliest possible opportunity following the release of the first tranche of 2021 Census data in late June 2022.

- 1.3. When considering a Local Plan review, Members should take into account changes in local and national policy, the efficacy of the Local Plan and any significant changes to the local housing need. The Planning Practice Guidance (PPG) tells us that where a Plan was adopted prior to the introduction of the Standard Method – as is the case here - it should be considered that a significant change in local housing need has occurred.
- 1.4. Since the Plan was adopted in 2017 there have been a number of wider reaching changes in the national context such as the pandemic and Brexit, and in the local context too. Members have given a clear commitment to give even greater priority to environmental policies within a Plan Review. It is therefore considered that this trigger has also been met.
- 1.5. The provision of dwellings over the Plan period so far has been slightly above that anticipated at the adoption of the Plan, and therefore the principal land use policy can be considered to be effective. However, a review will allow for more granular data to be collected and considered with regards to house typology, tenure and so forth, as well as considering the other policies within the Plan.
- 1.6. Given the conclusions of the preceding paragraphs it is recommended that a review of the Local Plan is appropriate.
- 1.7. Local Plan Reviews can take two forms. Firstly, a Partial Review can take place looking at only a few strategic policies in the Plan, with the majority of the plan untouched. Alternatively, a Full Review can take place, which considers the Plan in its entirety and allows for much greater scope of change. In either case, strategic policies must cover a minimum of 15 years from the point of adoption and therefore either option will result in an according extension of the current Plan Period.
- 1.8. Due to the level of changes since the adoption of the current Plan, and the desire to maximise the opportunity to embed the environment at the heart of a revised Plan, it is proposed to undertake a full Plan Review. It is anticipated that this might take somewhere between 24 and 30 months to complete.

1.9. An indicative timeline is below and is included in a refreshed Local Development Scheme at Appendix 1.

	2023												2024												2025						
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J
Cabinet			■		■											■															
Reg 18 consultation (Issues & Options)				■		■	■	■			■																				
Analyse reps / update evidence				■				■	■	■	■						■														
Reg 19 (Publication) Plan to Cabinet				■							■																				
Reg 19 consultation				■								■	■	■																	
Prep for submission				■									■	■	■																
Council authority to submit plan				■										■																	
Submit				■												■															
Examination in public				■														■	■	■	■	■									
Inspector's report / prep report to Council				■																			■	■							
Adoption				■																					■						

1.10. There are a number of variables that may lead to that timeline being extended including the unavailability of Inspectors to convene the Examination in Public or a longer time needed to assess and integrate complex representations to the consultations. Any significant delays will be reported to Cabinet in future reports.

1.11. The first stage of the Review will be an “Issues and Options” consultation. This will lay out the policy areas that have been identified for review and potential amendment, along with some options regarding those amendments. This draft document will be brought before Cabinet and Council in March 2023 for approval to consult with the public and statutory bodies following the local elections taking place in May.

1.12. Officers will produce detailed topic papers to review the policies of the Plan, working closely with colleagues across the Council. That work is given oversight and steer by the Cabinet Advisory Panel – Coventry Local Development Plan, which meets regularly to discuss progress and ensure the Review progresses in a timely and appropriate manner.

**2. Options considered and recommended proposal**

2.1. The Council could choose not to progress with a review of the Local Plan. However, irrespective of any policy context changes, the introduction of the Standard Method necessitates a degree of review, as outlined in para 1.3 above and para 062 of the PPG. Therefore, this option is not recommended.

2.2. The Council could choose to undertake a partial Plan Review. This would allow for a limited number of strategic policies to be considered, consulted upon, and updated. Whilst this might comply with the requirements of the NPPF, it would not offer the

opportunities to consider the impacts of the Plan holistically nor to deliver the kind of meaningful change that members want. As such this option is not recommended.

- 2.3. The Council could choose to not progress with a review of the Local Plan and instead start the process of developing a completely new Local Plan. This would extend the timeline and costs of production and is not likely to add significant benefit to the City above the more succinct Review options. Therefore, this option is not recommended.
- 2.4. The Council could choose to undertake a full review of the Local Plan, looking at all policy areas and making proposed amendments, additions and changes to improve them. This offers the Council the best mix of opportunity for improvement but on a comparatively shorter timescale. This option is recommended for approval.

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

- 3.1. No formal consultation has taken place yet. Public involvement is a key element of the Plan Review and will be undertaken as set out in the Local Development Scheme.

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

- 4.1. The decision will be implemented as soon as practicable

### **5. Comments from the Chief Operating Officer (Section 151 Officer) and the Director of Law and Governance**

#### **5.1. Financial implications**

There are significant unavoidable costs associated with reviewing the Local Plan, contained primarily in the costs of commissioning a refreshed evidence base and the cost of the Examination in Public. At this stage costs are estimations, with greater accuracy possible as the various tender processes conclude. However, the Policy team have identified 11 key pieces of evidence that need to be commissioned, at a combined estimated cost of £172,000.

Whilst the exact timing of these costs is not known, it is estimated to be as follows:

	£000's
2022/23 (Current Year)	72
2023/24	100
Total	172

None of the above is currently budgeted for, therefore these costs will result in in-year budgetary control pressures as indicated.

The cost of the Examination will be estimated in a future report closer to the time, which will allow for a more accurate estimation of both time and location costs.

#### **5.2. Legal implications**

There are no direct implications as a result of this report. The process for preparing a Local Plan is contained within the Planning and Compulsory Purchase Act 2004, Localism Act 2011 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

## **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 process of reviewing the Local Plan is a statutory requirement. However, through the process the Local Plan will continue to contribute to aims of the Council Plan such as improving the lives of current and future residents, ensuring the delivery of affordable homes, employment opportunities and accessible open space.

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

An internal risk log has been developed and will be updated as progress is made or changes occur, and will be reviewed at the monthly Plan Review meeting held between officers and the Cabinet Member for Communities and Housing.

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

There will be staffing and resource impact from these proposals, however these are anticipated to be absorbed within current staffing provision.

### **6.4. Equality/ EIA**

A full Equality and Impact Assessment (EqIA) 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**

The development of a reviewed Plan will allow the Council to consider additional policies related to climate change and the environment.

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

None

## **Report author:**

### **Name and job title:**

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### **Service**

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Councillor D Welsh	Cabinet Member for Housing and Communities	-	07/10/2022	31/10/22

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