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**To: Communities and Neighbourhoods Scrutiny Board (4)**

**Date: 21<sup>st</sup> September 2023**

**Subject: Local Plan Review – Issues and Options**

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## **1 Purpose of the Note**

- 1.1 To enable members of the Communities and Neighbourhoods Scrutiny Board to contribute to the review of the Local Plan

## **2 Recommendations**

- 2.1 The Communities and Neighbourhoods Scrutiny Board are recommended:
  - 1) To consider the information provided in the briefing note and accompanying appendices.
  - 2) Identify any comments or queries to be included as part of the review.

## **Background and Information**

### **3 The need to review the Local Plan**

- 3.1 Coventry City Council adopted its Local Plan and accompanying Area Action Plan for the City Centre in December 2017. These documents set out how much and what kind of development is needed up until the year 2031, where it should go, and what policies should be applied in order to help the Council decide whether planning applications are acceptable or not. They are known as Development Plan Documents (DPDs) and are prepared in line with a strict legal process.
- 3.2 The Government currently requires that the policies of the adopted Local Plan should be reviewed every five years to see if they are up to date or whether they need changing or even rewriting to reflect changes to national policy or other matters.
- 3.3 This is what we are now doing. We are carrying out a full review which means that we are reviewing every policy to see what needs changing and why, and whether there are any new policy areas we should be introducing.

### **4 The One Coventry Plan and Climate Change**

- 4.1 Since the Local Plan was adopted the Council has published a new corporate plan, the One Coventry Plan 2022 – 2030. The vision is set out below, which the reviewed Local Plan will need to play its part in delivering.

## 5 One Coventry Vision

- 5.1 'One Coventry – working together to improve our city and the lives of those who live, work and study here. We will create:
- A city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created
  - A city where our residents get the best possible start in life, experience good health and age well, in a city that embraces diversity, protects the most vulnerable and values its residents and communities
  - A city that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change'

## 6 Climate Change Strategy

- 6.1 The draft Climate Change Strategy was consulted on in spring / summer 2023, and it is intended to publish the final version by the end of 2023. This establishes a framework as to how Coventry City Council plans to work as a local authority, and through its arms-length operating companies, to meet sustainability objectives combatting waste and pollution, promoting biodiversity, focusing on the need to tackle climate change and adapt to the inevitable changes to the climate in Coventry and the UK.
- 6.2 The draft Climate Change Strategy contains the vision:  
*'To make Coventry the UK's leading Sustainable City, improving the quality of life for all'.*
- 6.3 The draft strategy sets out five development pathways to sustainability:
- Low emission – new economic opportunities through decarbonisation and innovation
  - Nature-based – enhance the biodiversity and urban ecosystems of our green and blue infrastructure
  - Circular economy – new models of production and consumption, reducing waste and increasing re-use and recycling
  - Resilient – anticipate, prevent, absorb and recover from the impacts of climate change and changing weather patterns
  - Equitable and people-centred – inclusive urban communities, addressing poverty and ensuring a just transition to ensure our most deprived communities are not disproportionately impacted in our efforts to tackle the causes and consequences of climate change
- 6.4 In terms of the Local Plan review, the draft Climate Change Strategy states that:  
'The Plan Review process will be wide ranging and should in particular consider opportunities to:
- Further promote energy conservation in buildings and the development and use of renewables for energy generation
  - Further protect and enhance biodiversity

- Promote high quality design that promotes active travel
- Ensure accessibility to public transport and minimise the need for the private motor vehicle
- Further reduce the risk of flooding and minimise the opportunities for heat gain'

6.5 It is essential that the Local Plan is prepared in a way which delivers sustainable development and supports our journey to net zero. The National Planning Policy Framework, within Local Plans must be prepared, sets out that there are three overarching objectives:

**an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

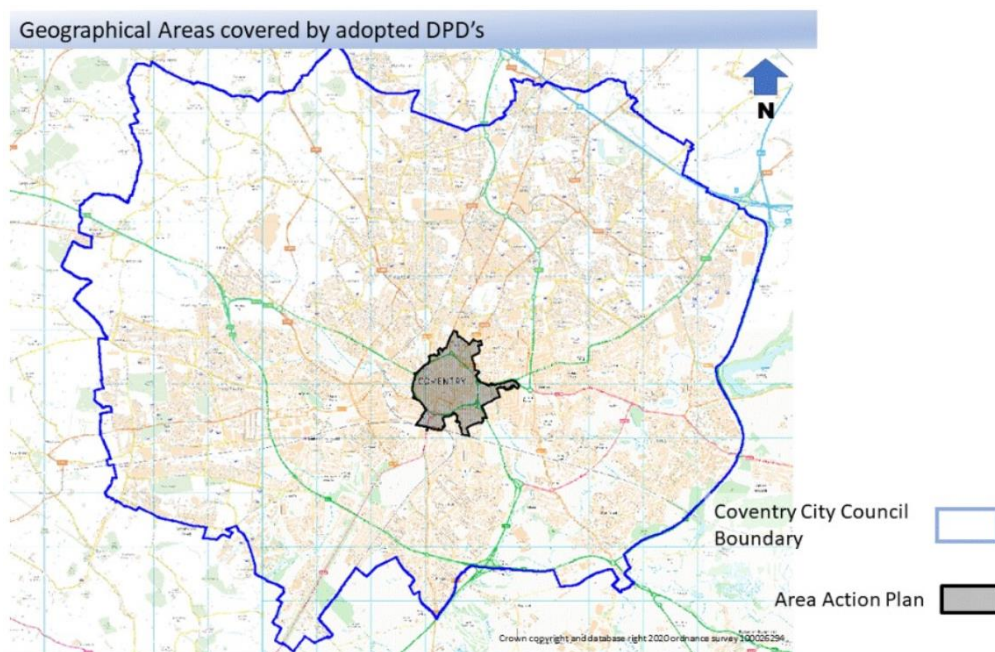
**a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

**an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

6.6 The plan review takes into account the above context, alongside the need to consider changes to national planning policy and guidance and other relevant policy and guidance. These are detailed in the separate chapters of the plan which address different themes.

## 7 The area covered by the Coventry Local Plan and the Coventry City Area Action Plan

7.1 The map below shows the area which each plan relates to. We are reviewing these together through the consultation documents and it is our intention that a final reviewed plan will result in both plans being incorporated into a single document.



## 8 The process of the Local Plan Review

- 8.1 The first stage of the review is the 'Regulation 18' stage as defined in the Town and Country Planning (Local Planning) (England) regulations. This is about setting the scope of the plan and deciding what we need to address. We are calling this our 'Issues and Options' plan as we need to consider what issues have arisen since the plan was adopted, and, where relevant what options we need to consider as well as any suggestions for updating or introducing policy. We are consulting on this and will take account of comments when we move forward to drafting the reviewed plan.
- 8.2 Once we have made any changes, we will consult again through a formal process required by law ('Regulation 19') before submitting the proposed plan to the Secretary of State for Levelling Up, Housing and Communities who will appoint an independent Planning Inspector to examine the plan and decide if it is sound and can therefore be adopted by the Council.
- 8.3 Any changes to our planning policies, including developing new policy, must be supported by robust evidence and we will publish this when we consult so you can see our reasoning, as well as making clear where we think we may need further evidence. We also need to ensure our policies are sustainable, have regard to environmental and health matters and consider impacts upon our communities. We therefore also prepare a Sustainability Appraisal and an Equality and Health Impact Assessment and these are also available for comment when we consult as these help us to shape our policies.
- 8.4 It is important to note that **this is not a NEW Local Plan**. It is important that the review is proportionate and focuses upon areas which need updating, in particular any strategic areas of change as these will have the most impact.

## 9 How the Issues and Options consultation document works

- 9.1 The starting point is the adopted 2017 Local Plan and City Centre Area Action Plan, as the task is to review these adopted documents to see what is up to date, what needs updating, and whether any new policies are required.
- 9.2 To keep the process of the review as simple as possible, the Issues and Options document (Appendices 1 and 2) follows the topic order of the adopted Local Plan and Area Action Plan as it will be easier to follow. The policies may well be re-ordered in the final version to reflect changed priorities.
- 9.3 For the Local Plan we have summarised each current policy for ease of reference, and then explained where we think it needs changing and why, and where we may need to introduce new policy. **We have not replicated each existing policy in full, as this would be too unwieldy, however the existing adopted Local Plan and Area Action Plan and accompanying policies map** can be seen on our website <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031>
- 9.4 We have provided the references to the evidence we have used in reviewing our policies so you can read further detail if you so wish, and we have produced a series of topic papers to help steer the debate.
- 9.5 For the Area Action Plan (AAP) review, the adopted plan contains a series of localised policies relating to the city centre, so in Chapter 14 we consider these, and we are asking for your comments as to the future of the AAP.
- 9.6 We are providing opportunities to comment throughout the process so that we can clearly see what people think about our suggestions and so that we can make any changes necessary. We are asking a series of questions, some of which are general and some of which are more technical in nature to help us understand detailed

change which has taken place since the Local Plan was adopted and to help us gather evidence to understand this and justify any alteration to policy which might be needed. Not all of the questions need to be answered, choose only those you wish to respond to.

- 9.7 We are also consulting on a Sustainability Appraisal which accompanies the Issues and Options consultation document. The Sustainability Appraisal, including Strategic Environmental Assessment, is a legal requirement. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

## **10 Health Inequalities**

- 10.1 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). The Development Planning Document creates additional policy and so a further EIA has been undertaken. A refreshed EqIA will be produced as part of the Plan Review.

Appendix 1: Issues and Options consultation document

Appendix 2: Non-technical summary

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