

Cabinet
Council

26th August 2025
2nd September 2025

Name of Cabinet Member:

Cabinet Member for Housing and Communities – Councillor N Akhtar

Director approving submission of the report:

Director of Regeneration and Economy

Ward(s) affected:

All Wards

Title: Local Plan Review – Submission for Examination

Is this a key decision?

Yes - the proposals are likely to have a significant impact on residents or businesses in two or more electoral wards in the City

Executive summary:

On 14th January 2025, Council resolved to progress the Local Plan Review to 'Regulation 19' stage of publication, this being the final consultation stage in plan-making which precedes submission to the Secretary of State for examination.

The Local Plan has undertaken two formal consultation stages, these being at Regulation 18 and Regulation 19 stages, during which the Council received 1,719 comments from 930 respondents at Regulation 18 stage and 402 comments from 75 respondents at Regulation 19 stage.

Following the conclusion of the Regulation 19 publication on 3rd March 2025 a review of representations has been undertaken, alongside an advisory visit from the Planning Inspectorate. This report now seeks authority to submit the reviewed Coventry Local Plan for examination to the Planning Inspectorate, this being a mandatory stage of plan making which must take place prior to adoption. The decision to submit will have direct financial implications, including the costs charged to the authority by the Planning Inspectorate. Should the Plan then be found 'sound' by the Inspectorate, the Local Plan Review will return to Cabinet and Council for approval for formal adoption.

Recommendations:

Cabinet, having considered the response from the formal consultation, is requested to:

- (1) Endorse the submission of the draft Coventry Local Plan at Appendix 1 – 5 together with relevant associated documentation for independent examination by the Secretary of State.

Cabinet, having considered the response from the formal consultation, is requested to recommend that Council:

- (1) approve the submission of the draft Coventry Local Plan at Appendix 1 – 5 together with relevant associated documentation for independent examination by the Secretary of State.
- (2) Directs that submission is accompanied by a request that the Inspector appointed to carry out the examination recommends any modifications necessary to make the Coventry Local Plan sound and legally compliant in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).
- (3) Delegate authority to the Director of Regeneration and Economy, following consultation with Cabinet Member for Housing and Communities, to take or authorise such steps as may be necessary for the independent examination of the Coventry Local Plan to be completed including but not limited to:
 - a) make appropriate arrangements for submission of the Coventry Local Plan and the completion and submission of all documents relating to the Coventry Local Plan;
 - b) Make all necessary arrangements for examination including:
 - the appointment of a Programme Officer;
 - the undertaking and/or commissioning of other work necessary to prepare for and participate at examination;
 - proposing main and/or minor modifications to the Plan and/or modifications to the Policies Map;
 - entering into Memorandums of Understanding and Statements of Common Ground; and
 - the delegation to officers and other commissioned experts to prepare and submit evidence, representations and submissions to the examination and, where necessary, appear at any hearing sessions and represent the council; and
 - c) implement any consequential actions relating to the examination, including undertaking any consultation that may be necessary, and

publishing the recommendations and reasons of the person appointed to carry out the examination. .

Council having considered the response from the formal consultation is recommended to:-

- (1) Approve the submission of the draft Coventry Local Plan at Appendix 1 – 5 together with relevant associated documentation for independent examination by the Secretary of State.
- (2) Directs that submission is accompanied by a request that the Inspector appointed to carry out the examination recommends any modifications necessary to make the Coventry Local Plan sound and legally compliant in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).
- (3) Delegate authority to the Director of Regeneration and Economy, following consultation with Cabinet Member for Housing and Communities, to take or authorise such steps as may be necessary for the independent examination of the Coventry Local Plan to be completed including but not limited to:
 - a) make appropriate arrangements for submission of the Coventry Local Plan and the completion and submission of all documents relating to the Coventry Local Plan;
 - b) Make all necessary arrangements for examination including:
 - the appointment of a Programme Officer;
 - the undertaking and/or commissioning of other work necessary to prepare for and participate at examination;
 - proposing main and/or minor modifications to the Plan and/or modifications to the Policies Map;
 - entering into Memorandums of Understanding and Statements of Common Ground; and
 - the delegation to officers and other commissioned experts to prepare and submit evidence, representations and submissions to the examination and, where necessary, appear at any hearing sessions and represent the council; and
 - c) Implement any consequential actions relating to the examination, including undertaking any consultation that may be necessary, and publishing the recommendations and reasons of the person appointed to carry out the examination.

List of Appendices included:

The following appendices are attached to the report:

- Appendix 1 – CCC Local Plan Regulation 19 (inc erratum statement)
- Appendix 2 – CCC Local Plan Regulation 19 Appendices
- Appendix 3 – Summary of key issues from Regulation 19
- Appendix 4 – Current Housing Supply Trajectory (August 2025)
- Appendix 5 – Sustainability Appraisal

Background papers:

- Adopted Local Plan 2017
- Adopted Coventry City Area Action Plan 2017
- Regulation 19 Reports to Cabinet and Council (10th December 2024 and 14th January 2025).
- Statement of Community Involvement July 2021
- Regulation 19 full responses –
<https://www.coventry.gov.uk/planning-policy/local-plan-review/4>
- Background Papers and Evidence base available at :
<https://www.coventry.gov.uk/planning-policy/local-plan-review>
- Local Development Scheme September 2025 (Cabinet 26th August 2025)

Has it or will it be considered by scrutiny?

The Local Plan review was presented to the Communities and Neighbourhoods Scrutiny Board (4) in September 2023 during the Regulation 18 stage to inform the ongoing development of the Plan, and further on the 18th December 2024 to inform upon the Regulation 19 stage.

Has it or will it be considered by any other council committee, advisory panel or other body?

Ongoing Member engagement has been undertaken through meetings of the Local Plan Advisory Group upon the formulation of the Plan prior to seeking authority for submission for examination, this included support of the recommendation of submission, presented to the Advisory Panel on the 2nd June 2025.

Will this report go to Council?

Yes – 2 September, 2025

Report title: Local Plan Review – Submission for Examination

1. Context (or background)

- 1.1 Local Plans should be considered for review at least once every five years, as laid out in Paragraph 33 of the National Planning Policy Framework and (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).
- 1.2 As the Local Plan was adopted in December 2017, Council approved the commencement of a full review of the Local Plan on 6th December 2022 with the objective of ensuring policies are up to date, in line with changes to national policy and guidance, and that they continue to reflect local priorities. It should be noted that the Coventry City Area Action Plan, was adopted alongside the Local Plan, and this will be incorporated in this review. Therefore, all references to 'The Local Plan', 'The Plan' and 'Plan Review' incorporate both documents.
- 1.3 It should also be noted that the Government published a revision to the National Planning Policy Framework (NPPF), this revision to the NPPF has implications for the Local Plan Review process which are outlined later in this report.
- 1.4 Each policy in the 2017 Local Plan has been considered in turn in the context of current legislation and guidance and, where appropriate, updated evidence. The Reviewed Local Plan includes some policies that are unchanged from 2017, some with varying degrees of change and, where necessary, some new policies.
- 1.5 Consultation has been undertaken in line with the relevant regulations and the adopted Statement of Community Involvement to ensure that individuals, communities, stakeholders, and other organisations have ample opportunity to engage through a variety of means. The established planning policy database will directly notify those registered at the launch of the consultation.
- 1.6 Having completed the mandatory stages of consultation in Plan making, approval is now sought from Council to submit the reviewed Local Plan for examination with the Planning Inspectorate and delegate authority to the Director of Regeneration and Economy, following consultation to the Cabinet Member for Housing and Communities to make the necessary arrangements for examination including any modifications requested to the Plan during the examination period.
- 1.7 Further to examination and upon receipt of a report from the Planning Inspectorate that the Plan has been found to be 'sound', the Local Plan will return to Council for adoption.

2. Local Plan Review – Key Matters

- 2.1. The Regulation 19 Version of the full Local Plan has been produced further to earlier stages of consultation and engagement, and officers consider should be submitted to the Secretary of State for public examination. It therefore contains the information and detail that would be found in an adopted Local Plan.

- 2.2. The Regulation 19 Plan is informed by an up-to-date evidence base, which has been published in full alongside the Regulation 19 consultation. In the formulation of the reviewed Plan, officers and the Local Plan Advisory Panel have considered feedback from the Regulation 18 and Regulation 19 consultations, alongside the relevant expert evidence. The following paragraphs are a summary of the key matters contained in the reviewed Plan.
- 2.3 The Local Plan Review contains the following development targets for the 2021-2041 plan period:
- 29,100 dwellings;
 - 60ha employment land;
- 2.4 The proposed development targets are informed by the 2022 Coventry and Warwickshire HEDNA (Housing and Economic Development Needs Assessment) and additional updated evidence.
- 2.5 Development that has already been completed in the 2021-2041 period counts towards these targets and therefore new allocations proposed within the plan are for the quantities of additional development required to achieve these overall targets.
- 2.6 The Local Plan Review does not propose any changes in respect of Greenbelt boundaries or designations. All newly proposed development allocations are on previously developed land and therefore in line with the Local Authorities 'brownfield first' approach to identifying development land. In pursuing an approach of 'brownfield first' and protection of the City's remaining areas of Greenbelt, the Regulation 19 Version also reviews the policy areas of development density and design. This approach is in alignment with National Governments priority for higher density development within urban areas, alongside locally embedding high quality standards upon design and internal living spaces.
- 2.7 The City of Coventry has a tightly-drawn administrative boundary and therefore development land is always in short supply. Through the allocation of brownfield development sites, the Council is able to identify land to meet the overall target of 29,100 dwellings. However, at this stage and notwithstanding a dedicated 'call for sites' being undertaken for employment land, identification of land to meet the overall employment land need has not been possible. The Council recognises the need to support the local economy and enable job creation and continues to work with our Duty to Cooperate partners to consider strategic options for meeting this need in the absence of suitable available sites within the city.
- 2.8 The Local Plan Advisory Panel has made clear the priority for the delivery of Social Rented housing and a suitable mix of house types to meet the needs of communities within the city. To the end, the policies proposed within the Reviewed Local Plan include the following changes:
- Reduced threshold for the provision of Affordable Housing on new development sites – any site over 10 dwellings should now provide Affordable Housing

- An increased proportion of Social Rented housing on all qualifying sites
- Adoption of Nationally Described Space Standards for all new housing developments

- 2.9 In respect of Climate Change, the Regulation 19 Plan includes new and revised policies seeking to reduce the negative environmental impacts of new development. These policies are proposed to surpass current Building Regulations requirements for both residential and non-residential new build requirements, and policies are included for the setting of new standards for developers to meet for on-site renewable energy generation, restrictions in the use of fossil fuels and improved thermal efficiency.
- 2.10 The Plan review has undertaken to develop policy to guide the highest possible quality of development throughout the city, this includes both the development of new policy standards, and also a review of the engagement of current policy in the past plan period. Where additional clarity has been identified as being required, or modifications to be responsive to market delivery this has also been incorporated into policy development.
- 2.11 There are several policy areas where the Council would have wished to set higher and more ambitious standards for new development to meet our wider aspirations for the city and its communities, however national planning guidance requires that the viability of development is considered when formulating local planning policy. To that end, the viability implications of the policy proposals within the Reviewed Local Plan have been fully assessed and have iteratively informed the policy detail. The Plan therefore seeks to deliver a balanced set of changes to policy that will enable development to sustainably meet the needs of the city.

3 Changes to the National Planning Policy Framework

- 3.1 In February 2025, the Government published a revised National Planning Policy Framework. This was inclusive of 'transitional arrangements' for Plan making to allow the progression of plans to submission which had been prepared under the previous NPPF.
- 3.2 Having undertaken the Regulation 19 stage of Plan making in January to March 2025, alongside the levels of housing requirement set out in the Plan being over 80% of the current Standard Method, the Plan satisfies the requirements of the transitional arrangements, and is able to continue its progression to examination, being tested under the December 2023 NPPF.

4 Technical Requirements

- 4.1 There is a wide range of statutory requirements that must be followed in the formulation of a Local Plan in order for it to be found legally compliant and sound by the Planning Inspectorate. Key amongst these is the process of Sustainability Appraisal and Strategic Environmental Assessment. This involves the assessment of all objectives and options considered in the formulation of the Local Plan against a range of sustainability objectives.

- 4.2. The Sustainability Appraisal has been published as part of the publication process and is contained at Appendix Five of this report.
- 4.3. Regulation 19 of the Town and Country Planning Regulations 2012 requires that all documents that are to be submitted to the Secretary of State must be made available for public inspection. The full evidence base that has informed the Local Plan Review has been published as part of the public consultation alongside background papers which have been prepared to articulate the policy proposals made.
- 4.4 Work with all statutory consultees and Duty to Cooperate Partners has been ongoing throughout the process of the Local Plan Review. Details are available within the evidence base and supporting documents, inclusive of an updated DtC statement to accompany the submitted plan.
- 4.5 Submission for examination also requires the appointment of an independent Programme Officer. The role of the Programme Officer is to act as a conduit for information sharing between the Council, Third Party representors and the Inspector . In anticipation of submission, officers have established a contract for this appointment which will be enacted upon submission.

5. Public Consultation on the Proposed Submission

- 5.1. Public consultation must be undertaken in line with the Town and Country Planning Regulations 2012, The Town and Country Planning (Assessment of Environmental Effects) Regulations 1988 and the Council's Statement of Community Involvement (SCI).
- 5.2. Two public consultations have been undertaken in preparation for submission, these being the 'issues and options consultation undertaken between July and September 2023, and consultation upon the proposed submission plan 'Regulation 19' held between 20th January and 3rd March 2025. The Council received 1,719 comments from 930 respondents at Regulation 18 stage and 402 comments from 75 respondents at Regulation 19 stage.
- 5.3 A summary of the main issues raised at the Regulation 19 stage is available at Appendix Three of this report. A detailed record of representations to the Regulation 19 consultation stage alongside proposed modifications to be presented to the Planning Inspectorate in response will be published on the Local Plan Review webpage upon submission.

6. Options considered and recommended proposal

- 6.1 Cabinet and Council could choose to not progress the Local Plan Review to submission for examination, however, this would not address the need to review the Local Plan or be in accordance with the Local Development Scheme (LDS) and as such this option is not recommended.

- 6.2 Cabinet and Council could choose to instruct officers to undertake a further consultation round ahead of submission for examination. However, this option would necessitate further costs being incurred of updating the evidence base and lengthen the plan period. This option would also not be in line with the process of the Local Plan Review outlined in the LDS and is therefore not recommended.
- 6.3 The Council could choose to approve submission for examination of the Plan and delegate authority to the Director of Regeneration and Economy to undertake any directed revisions and associated consultation to the plan. This option would align to the LDS and the recommendations of the Local Plan Advisory Panel.

The Local Plan will then return to Cabinet and Council for a decision upon adoption further to examination should the Plan be found 'sound' by the Inspectorate. This option is recommended.

7. Results of consultation undertaken

- 7.1 The consultation outcomes of the Regulation 19 stage are included at Appendix Three of this report.

8. Timetable for implementing this decision

- 8.1 The decision will be implemented at the earliest opportunity following approval.

9. Comments from the Director of Finance and Resources and the Director of Law and Governance

9.1 Financial Implications

- 9.1.1 The Local Plan Review must be supported by robust evidence, the costs of which are being managed within existing departmental budgets but have resulted in managed overspends as reported through regular budget reports. Costs of evidence base procurement to date have totalled circa £310,000 over several years from 2022 to 2025.
- 9.1.2 The recommendation of submission for examination carries further financial impact through the mandatory requirement to appoint a programme officer and the costs billed to the City Council by the Planning Inspectorate.
- 9.1.3 The most significant element of cost implication will be that charged to the City Council from the Planning Inspectorate, which may be anticipated to be in the region of £10,000 per month. The total cost of this phase of plan making is therefore dependent upon the time spent in examination. It is anticipated that these costs of examination may total in the region of £250,000.
- 9.1.4 Potentially there could be other additional costs, for example additional consultant costs may incur during the examination process. Therefore the total anticipated costs of examination could exceed the estimate shown above.

9.2 Legal Implications

- 9.2.1 The main legislation governing plan-making is found in the Planning and Compulsory Purchase Act 2004 (“the 2004 Act”) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (“the 2012 Regulations”). In accordance with Sections 19 and 20 of the 2004 Act, the council has a statutory duty to prepare planning policies and maintain an up-to-date development plan (this is further reinforced through the NPPF and Planning Practice Guidance). The draft Plan has therefore been prepared in compliance with primary legislation.
- 9.2.2 In preparing the Plan, it is considered that the council has complied with the statutory duty to co-operate and engaged with prescribed bodies, local communities and other stakeholders throughout the plan making process in accordance with its Statement of Community Involvement.
- 9.2.3 Reflecting on the entire process to date, it is considered that the council has discharged its functions in respect of Regulation 18 (Preparation of a local plan) and Regulation 19 (Publication of a local plan) of the 2012 Regulations. Representations relating to the draft Plan submitted at the Regulation 19 consultation stage have been duly recorded in accordance with Regulation 20.
- 9.2.4 The next stage of the process (if authorised by Cabinet and Council) is submission of the Plan to the Secretary of State for independent examination. By section 20(2) of the 2004 Act, the council can only submit the Plan for independent examination if:
- (a) they have complied with any relevant requirements contained in the 2012 regulations; and
 - (b) they think the Plan is ready for independent examination.
- 9.2.5 It is considered that the council has complied with the relevant requirements in the Regulations and will continue to do so. As such, it is considered that there is no impediment to submitting the draft Plan and all supporting documents.
- 9.2.6 Once submitted to the Secretary of State, the draft Plan will be examined by an independent Inspector whose role is to consider compliance with section 20(5) of the 2004 Act, in essence whether the Plan is legally compliant and sound and whether the council has complied with the duty to cooperate. Under section 20(7C) of the 2004 Act, if formally requested by the council, the Inspector can recommend main modifications to the Plan if they are necessary to make it sound and/or legally compliant. As set out above, it is considered that the draft Plan is a sound and legally compliant plan (subject to any potential main modifications as discussed above) and that the council has complied with the duty to cooperate.
- 9.2.7 If the Plan passes the examination and is adopted, it will form part of the statutory development plan for the area and be used as such for the purpose of determining relevant planning applications and appeals.

Procurement Implications

9.2.8 The examination of the draft Coventry Local Plan will entail the need to procure the services of a suitably experienced Programme Officer to help support the appointed Inspector. The role of the Programme Officer is to act as a conduit for information sharing between the council, Third Party representors and the Inspector. The appointment of a Programme Officer is mandatory and as such, any contract to be put enacted shall be in accordance with the Council's procurement process and any associated legislative requirements.

10. Other implications

How will this contribute to the Council Plan

A reviewed Local Plan will enable the corporate priorities to be reflected as they are set out in the One Coventry Plan 2022 - 2030

How is risk being managed?

There is a risk that the reviewed policies could be found unsound by a Planning Inspector, however this is minimised by producing a thorough evidence base and having undertaken extensive consultation prior to submission of the Plan.

What is the impact on the organisation?

No direct impact from having additional planning policies.

Equalities / EIA?

A full Equality and Impact Assessment (EIA) has been undertaken as part of developing the Proposed Submission Local Plan and this has shaped policy preparation. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010).

Implications for (or impact on) climate change and the environment?

The Proposed Submission Version contains new planning policies which seek to address the Councils' priorities for climate change. These policy areas have been informed by specialist evidence which has been jointly considered by CCC planning policy and climate change teams.

Implications for partner organisations?

None

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