

To: The Chairman and Members of the Local Development Framework Sub-Committee

(Councillors Reilly, Humphreys, Osborne, Ridley, Simpson and Taylor)

For the information of the other Members of the Council

For general enquiries please contact Democratic Services on 01827 719226 or via e-mail: democraticservices@northwarks.gov.uk

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LOCAL DEVELOPMENT FRAMEWORK SUB-COMMITTEE

11 SEPTEMBER 2023

The Local Development Framework Sub-Committee will meet on Monday, 11 September 2023 at 6.30pm in the Council Chamber at The Council House, South Street, Atherstone, Warwickshire.

The meeting can also be viewed on the Council's YouTube channel at [NorthWarks - YouTube](#).

AGENDA

- 1 Evacuation Procedure.**
- 2 Apologies for Absence/ Members away on official Council business.**
- 3 Disclosable Pecuniary and Non-Pecuniary Interests.**
- 4 Minutes of the meeting of the Local Development Framework Sub-Committee held on 4 July 2023 - copy herewith, to be approved as a correct record and signed by the Chairman.**

ITEMS FOR DISCUSSION AND DECISION

(WHITE PAPERS)

- 5 **Summary of Sustainability Appraisal Scoping Report for Consultation** – Report of the Chief Executive

Summary

Members requested at the meeting on 4 July a simplified summary of the Sustainability Appraisal (SA) to be brought to the Sub-Committee for consideration prior to approval for consultation. This report brings that summary for consideration.

The Contact Officer for this report is Dorothy Barratt (719250).

- 6 **Draft Gypsy and Travellers Development Plan Document – Scope, Issues and Options for Consultation** – Report of the Chief Executive

Summary

A verbal update will be given to the Sub-Committee following the Member consultation on the Draft DPD and meeting on 6 September 2023.

The Contact Officer for this report is Dorothy Barratt (719250).

- 7 **Statement of Community Involvement (SCI)** – Report of the Chief Executive

Summary

The report seeks approval for consultation on an updated Statement of Community Involvement (SCI).

The Contact Officer for this report is Dorothy Barratt (719250).

- 8 **Draft Employment Development Plan Document – Scope, Issues and Options for Consultation** – Report of the Chief Executive

Summary

This report seeks authority to consult on a Draft Employment Development Plan Document – Scope, Issues and Options.

The Contact Officer for this report is Mike Dittman (719451).

9 **The Coventry Local Plan Review Issues and Options (Regulation 18) Consultation (2023)** – Report of the Chief Executive

Summary

This report brings the Coventry Local Plan Review Issues and Options (Regulation 18) Consultation (2023) for consideration by Members.

The Contact Officer for this report is Mike Dittman (719451).

10 **Plan-Making Reforms: Consultation on Implementation** - Report of the Chief Executive

Summary

The report brings information on the plan making reforms consultation by national Government and seeks Members support for the views expressed in the report and to make any additional comments for consideration by Executive Board.

The Contact Officer for this report is Dorothy Barratt (719250).

STEVE MAXEY
Chief Executive

NORTH WARWICKSHIRE BOROUGH COUNCIL

MINUTES OF THE LOCAL DEVELOPMENT FRAMEWORK SUB-COMMITTEE

4 July 2023

Present: Councillor Reilly in the Chair.

Councillors Humphreys, Osborne, Ridley, Simpson and Taylor.

Councillors H Phillips and Parsons were also in attendance.

1 **Disclosable Pecuniary and Non-Pecuniary Interests**

There were none declared at the meeting.

2 **Minutes of the meeting of the Local Development Framework Sub-Committee held on 20 February 2023.**

The minutes of the meeting of the Local Development Framework Sub-Committee held on 20 February 2023, copies having been previously circulated, were approved as a correct record and signed by the Chairman.

3 **North Warwickshire Local Plan – Process for Review**

The Chief Executive explored the various timelines and options for taking forward a review of the North Warwickshire Local Plan.

Recommended to Executive Board:

- a **That the Local Development Scheme be updated to reflect the continued production of the Employment and Gypsy and Traveller Development Plan Documents; and**
- b **Following the publication of the AMR 2022/23 a further report be brought to Board to consider the next steps in terms of plan making.**

4 **Local Development Scheme (LDS) July 2023**

The Chief Executive presented a revised up to date Local Development Scheme.

Recommended to Executive Board:

That the Local Development Scheme be approved.

5 Draft Scoping Report for Consultation

The Chief Executive Informed Members of the update to the 2006 Scoping Report and sought approval for a formal 6-week consultation to be carried out.

Recommended to the Sub-Committee:

That the Scoping Report be approved for a 6-week public consultation, subject to producing a user-friendly guide.

6 Draft Gypsy and Travellers Development Plan Document – Scope, Issues and Options for consultation

The Chief Executive sought authority to consult on a Draft Gypsy and Travellers Development Plan Document – Scope, Issues and Options.

Resolved:

- a That approval be given for Member Consultation to be carried out on the Draft Gypsy and Travellers Development Plan Document - Scope, Issues and Options; and**
- b To report back to the meeting of the Local Development Framework on 11 September 2023.**

D Reilly
Chairman

Agenda Item 5

Local Development Framework Sub-Committee

11 September 2023

Report of the Chief Executive

Summary of Sustainability Appraisal Scoping Report for Consultation

1 Summary

- 1.1 Members requested at the meeting on 4 July a simplified summary of the Sustainability Appraisal (SA) to be brought to the Sub-Committee for consideration prior to approval for consultation. This report brings that summary for consideration.

Recommendation to the Sub-Committee

That the summary of the Sustainability Appraisal, which will accompany the Draft Sustainability Appraisal Scoping Report, be approved for consultation.

2 Consultation

- 2.1 Consultation has taken place with Councillors Reilly and Taylor. Any comments received will be reported at the meeting.

3 Background

- 3.1 Members requested at the last sub-committee that a simplified summary be prepared to explain the sustainability process which would help to explain the SA Scoping Report. A summary is attached as Appendix A for Members' consideration.

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- 3.2 If approved, the summary will be included in the consultation on a range of documents, which will include the following:
- a. Draft SA Scoping Report
 - b. Updated Statement of Community Involvement (SCI)
 - c. Draft Employment DPD
 - d. Draft Economic Development Strategy
 - e. Draft Gypsy and Traveller DPD
 - f. Call for Sites

4 Report Implications

4.1 Finance and Value for Money Implications

4.1.1 Further work could be needed to be undertaken by consultants in a critical friend capacity. If this is considered necessary, it would be funded from the Local Plan budget (code 2009).

4.2 Legal and Human Rights Implications

4.2.1 This work will be undertaken in line with the requirements of the Planning and Compulsory Purchase Act 2004 and European Directive 2001/42/EC on Strategic Environmental Assessment Directive the provisions of the latter of which must still currently be considered notwithstanding Brexit.

4.3 Human Resources Implications

4.3.1 In the past consultants have been commissioned to prepare the SA from scope to final adoption of a planning policy document. This initial scoping document has been prepared in-house. With the proposed changes to the process with the introduction of an Environmental Outcome Report for a Local Plan it is proposed at the present time to keep the process in-house. However, this will be reassessed at each stage due to the impact on staff time as SA's are very intensive to prepare.

4.4 Environment, Sustainability and Health Implications

4.4.1 The Scoping Report and then the full Sustainability Appraisal will help identify any social, economic or environmental issues that need to be address by avoidance or through mitigation where possible in all future Development Plan Documents.

The Contact Officer for this report is Dorothy Barratt (719250).

Background Papers

Local Government Act 1972 Section 100D, as substituted by the Local Government Act, 2000 Section 97

Background Paper No	Author	Nature of Background Paper	Date

Summary of Sustainability Appraisal Scoping Report to accompany planning policies for the Borough of North Warwickshire

What is a Sustainability Appraisal?

Completing an SA is a legal requirement of plan making and its purpose is to promote sustainable development during process. The key part is to assess the emerging plan, when compared with reasonable alternatives. It will help to achieve social, environmental, and economic objectives. It sets out a Framework for all future planning policies to be assessed.

The SA process comprises several stages from evidence gathering, to assessment and monitoring the effects of the plan once completed. The Scoping Report sets out the framework of SA objectives and related assumptions which will be used to assess the plan and alternative strategy/ policy options. It also lists the existing plans, policies, programmes, evidence, and sustainability issues to create the SA Objectives.

What is a Scoping Report for the Sustainability Appraisal?

The Scoping Report explains the steps North Warwickshire Borough Council (NWBC) will take to ensure future planning policies deliver sustainable development. This Summary outlines the background to the Sustainability Appraisal (SA) and the next steps.

Consultation

We are consulting the general public and a range of stakeholders on the SA Scoping Report for a period of six weeks. There are two key questions which are shown below. When answering these questions please provide as much information for your reasons and provide any evidence you may have as this will help us to understand your response.

Key

All comments to be submitted by:

Date

XX January 2024

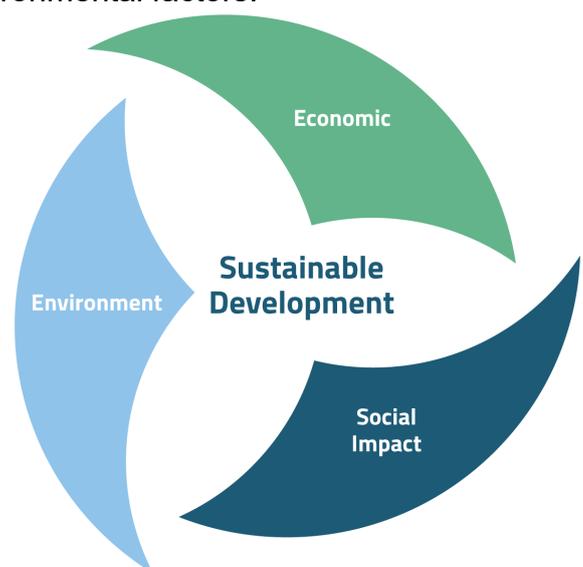
Key Questions

Question 1 Do you agree with the key issues and objectives identified in the proposed scoping report?

Question 2 Are there any other issues and/or objectives that need to be considered in the report?

Key Parts of Sustainability

Sustainable development is where economic, social and environmental factors are balanced against each other. The National Planning Policy Framework and the North Warwickshire Local adopted in Sept 2021 have sustainable development at their heart. Going forward, any planning policies prepared for North Warwickshire will continue to do so but the SA will help in achieving this by looking at the keys factors from the economic, social and environmental factors.



Proposed Approach

Sustainability issues will need to be addressed by planning policies, to ensure the delivery of sustainable development. These issues and problems relate to the following broad themes in the plan-making process: population change, crime, health, housing and regeneration, economy and skills, transport, historic environment and heritage, water, pollution, climate change, natural environment, biodiversity, minerals, and waste.

To assess if the planning policies will deliver sustainable development, a list of SA Objectives has been created. These will be used to test the economic, social, and environmental impacts of development strategies and planning policies. Table 1 below contains the list of SA Objectives.

Table 1: Sustainability Objectives

Topic 1: Housing (including Gypsy and Traveller)	1) To meet housing needs of the current and future resident and by providing decent affordable homes of right quality and type.	
2a) To promote safer communities and reduce the fear of crime and antisocial behaviour. 2b) To reduce Index of Multiple Deprivation (IMD) to address poverty and help improve access to facilities and services for disadvantaged individuals and communities 2c) Ensure easy and equitable access to services, facilities and opportunities. 2d) Support, empower and connect communities to create a healthier and just society.	Topic 2: Equality, Diversity and Community Development	
Topic 3: Health and Wellbeing	3a) To improve the health of the population and reduce health inequalities 3b) To improve access and availability of sports and recreation facilities 3c) To improve access and availability to open spaces	
4a) Encourage and enable waste minimisation, reuse, recycling and recovery 4b) To ensure a sustainable and efficient use of natural resources such as water and minerals	Topic 4: Waste and Resource Use	
Topic 5: Economy and Employment	5a) Achieve a strong, stable and sustainable economy and prosperity for the benefit of all of North Warwickshire residents 5b) To achieve sustainable levels of prosperity and growth throughout the Borough 5c) To improve educational skills of the overall population 5d) To maintain and enhance the vitality and viability of town and retail centres	
6a) Minimise air pollution levels and create good quality air 6b) Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the major urban areas, making efficient use of existing physical transport infrastructure	Topic 6: Air Quality	

Sustainability Objectives Continued

Topic 7: Water Quality

7) Minimise water pollution levels and create good quality water

- 8a) Minimise soil pollution levels and create good quality soil
- 8b) Encourage land use and development that creates and sustain well-designed, high quality distinctive and sustainable places
- 8c) Encourage the efficient use of previously developed land and buildings and encourage efficient use of land

Topic 8: Land and Soil

Topic 9: Achieving Zero Carbon Living

- 9a) Minimise North Warwickshire's contribution to the cause of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources
- 9b) Promote and ensure high standards of sustainable resource
- 9c) Reduce carbon emissions from transport to contribute to the Council's decarbonisation

10) To reduce vulnerability to climatic events and flooding

Topic 10: Flooding

Topic 11: Historic Environment

11) Value, protect, enhance North Warwickshire's built and historic and archaeological environment and landscape

12) Value, protect and enhance North Warwickshire's natural landscape

Topic 12: Natural Landscape

Topic 13: Biodiversity and Geodiversity

- 13a) Valuing, enhancing and protecting the biodiversity of North Warwickshire
- 13b) Valuing, enhancing and protecting the geodiversity of North Warwickshire

- 14a) Increase use of public transport, cycling and walking as a proportion of total travel and ensure development is primarily focused in the urban areas, making efficient use of existing physical transport infrastructure
- 14b) Ensure development reduces the need to travel and reduce the negative impacts of transport on the environment
- 14c) Urgently and drastically reduce carbon emissions from transport to contribute to the Council's decarbonisation commitment

Topic 14: Accessibility and Transport

Topic 15: Light

15) North Warwickshire is a rural area, whose character and distinctiveness arises from the lack of urban developments and characteristics associated with urban landscapes. Lighting is often seen as intrusive, indicative of increasing "urbanisation"

Sustainability Objectives Continued

16) Finding the qualities of places which generate tranquil feelings and protecting those locations and attributes is vital for a country pressured by development. Hartshill Hayes Country Park is shown on the tranquillity mapping carried out during 2006 by Northumbria University, commissioned by CPRE. It builds on previous methodology led by individual feelings about tranquil places with a simpler quantitative consultation approach, giving a 'national' understanding of the concept of tranquillity.

Within North Warwickshire the areas least disturbed by the presence of noise and visual intrusion from major infrastructure such as motorways and A roads, urban areas and airports lies south of Baxterley, north of Meriden covering the central rural area of North Warwickshire. This is shown on the natural England maps indicating change in the extent of intrusion and the resulting fragmentation of the undisturbed countryside from the early 1960s to the early 1990s to 2007

Topic 16: Tranquillity

Topic 17: Energy

- 17a) Reducing overall energy use through sustainable design, increasing energy efficiency and increasing the proportion of energy generated from renewable sources
- 17b) Ensure development maximises the potential for sustainable on-site generation while minimising the negative impacts of energy use and generation on the environment
- 17c) Urgently and drastically seek to reduce carbon emissions from energy production and use by the Council (where relevant) and by development within the Borough to contribute to the Council's decarbonisation commitment

Following the end of the consultation, the Borough Council will review all comments received and make changes to the proposed SA Framework where relevant, in line with national policy and legislation. It will then use the SA Framework to assess future planning policies and publish a report detailing how this has taken place when these plans are being prepared.

Next Steps

Further information



North Warwickshire
Borough Council

Please contact the Forward Planning Team using any of the following methods if you have any queries or require any further information:

Email: planning.policy@northwarks.gov.uk

Telephone: 08127 7192249/251

Post: NWBC—Forward Planning Team, The Council House, South Stret, Atherstone, CV9 1DE

To keep up to date on the work of the Forward Planning Team please join the Council's subscription service at www.northwarks.gov.uk and tick Forward Planning

Agenda Item No 6

Local Development Framework Sub-committee

11 September 2023

Report of the Chief Executive

Draft Gypsy and Travellers Development Plan Document – Scope, Issues and Options for consultation

1 Summary

- 1.1 A verbal update will be given to the Sub-Committee following the Member consultation on the Draft DPD and meeting on 6 September 2023.

Recommendation to the Sub-Committee:

That the Draft Gypsy and Traveller DPD – Scope, Issues and Options incorporate any changes identified by the Sub-Committee and be approved for public consultation.

2 Member Consultation

- 2.1 Following discussion at the last LDF Sub-Committee meeting consultation has taken place with members to seek their view of the Draft Gypsy and Travellers Development Plan Document – Scope, Issues and Options for consultation (item 8, 4 July 2023 [Agendas, reports and minutes | North Warwickshire \(northwarks.gov.uk\)](https://www.northwarks.gov.uk/agendas-reports-and-minutes)).
- 2.2 The draft development plan document was circulated to all members and a member consultation meeting has been arranged for 6 September to discuss the document in detail. A verbal update will be provided at the sub-committee meeting following the consultation meeting and any potential changes identified for the Sub-committee's consideration.

3 Report Implications

3.1 Legal, Data Protection and Human Rights Implications

- 3.1.1 The production of a Gypsy and Travellers DPD will contribute toward the Council's compliance with various legal responsibilities. First, under the Housing Act 1985 in its capacity as a local housing authority, the Council must consider housing conditions in its area and the needs of the district with respect to provision of further housing accommodation. This includes the needs of people residing in or resorting to its area for provision of sites on

which caravans can be stationed or places on inland waterways at which houseboats can be moored. The purpose of this is to identify sites where caravans can be situated as part of the assessment of mainstream housing need.

3.1.2 Other legislative provisions can also be relevant to assessment and provision of Gypsy and Traveller accommodation including Section 11 of the Children Act 2004, various provisions of the Equality Act 2010 and the European Human Rights Convention.

3.1.3 Production of the DPD will help to ensure that the accommodation needs of the Gypsy and Traveller community can be properly identified and considered in determination of planning applications.

3.2 Equalities Implications

3.2.1 The production of a Gypsy and Travellers DPD will help meet the Council's various responsibilities under the Equality Act 2010.

3.3 Links to Council's Priorities

3.3.1 Helps address Priority 2, Creating Safer Communities and Priority 5, Promoting Sustainable & Vibrant Communities.

The Contact Officer for this report is Dorothy Barratt (719250).

Agenda Item No 7

Local Development Framework Sub-committee

11 September 2023

Report of the Chief Executive

Statement of Community Involvement (SCI)

1 Summary

- 1.1 The report seeks approval for consultation on an updated Statement of Community Involvement (SCI).

Recommendation to the Sub-Committee

That the Statement of Community Involvement (SCI) be approved for consultation.

2 Consultation

- 2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.

3 Background

- 3.1 A Statement of Community Involvement (SCI) sets out how a local authority will involve and engage with a range of stakeholders who appear to have an interest in matters relating to development in its area, including the public, during the production of a local plan, the preparation of other local development plan documents and dealing with planning applications. The current SCI was adopted in 2007.

- 3.2 During local plan consultations the SCI sets out the minimum requirements for the type and range of consultation methods to be used. In practice, however, the Forward Planning Team have always tried to add other methods where possible. For example, the use of social media. It is now common practice that we would publicise events and stages on Facebook and Twitter. The pandemic has increased the use of digital technology and this is expected to be reflected in how consultations are carried out.

4 SCI

- 4.1 The Borough Council adopted the SCI in April 2007. It was updated as a result of the pandemic indicating that documents would be available at the Council House for inspection by appointment. It has now been refreshed again and is attached as Appendix A.

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- 4.2 The SCI shows a range of methods that will be used in the event of a consultation. In the 2007 version there was a method G, the use of North Talk. North Talk is not currently produced and therefore is deleted from the consultation methods to be used. This is not seen as a major issue as the increased use of social media, use of the Council's website and its online subscription service mean that the cost benefit of North Talk was diminishing. Also, North Talk did not always fit in with consultations timelines. Therefore, its deletion is not seen as a major issue. However, if reintroduced, the Forward Planning Team will seek to use it if timelines coincide.
- 4.3 As well as consideration of the planning policy consultation methods the section relating to planning applications has also been reviewed to reflect current methods of consultation.

5 Next Steps

- 5.1 It is proposed that the SCI be consulted on alongside a range of other documents later in the year. Any comments made will be brought back to the sub-committee for consideration.

6 Report Implications

6.1 Legal, Data Protection and Human Rights Implications

- 6.1.1 The SCI is a requirement of the Planning and Compulsory Purchase Act 2004. Local Plans must also comply with legislation relating to production of a Local Plan. The relevant regulations in this case are the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 6.1.2 An SCI must set out the Council's policies for giving advice or assistance in relation to proposals for making a neighbourhood development order or neighbourhood plan. There is now a statutory requirement to review the SCI every five years starting from the date of its adoption.

- 6.1.3 The proposed SCI meets the requirements of these regulations.

6.2 Human Resources Implications

- 6.2.1 The proposed changes will mean that consultations for plan making will be both virtual and in person. Other ways of presenting information in a digital world will require learning new techniques which may have an impact on other work as, it is normal, that a consultation period consumes most of the Forward Planning team's time.

6.3 Equalities Implications

- 6.3.1 One of the key issues that the Borough Council must consider is whether people are being adversely affected by the changes to the SCI. An Equalities Impact of these changes has been carried out and is attached to this report.

6.3.2 In order to assist with making documents physically available for inspection Parish and Town Councils have been approached to see if the paper copy which is sent to them could also be made available for inspection if requested. An update of this request will be given at the Board meeting.

6.4 **Links to Council's Priorities**

6.4.1 Progressing planning policy documents is a key priority for the Council.

The Contact Officer for this report is Dorothy Barratt (719250).

North Warwickshire

Statement of Community Involvement

(SCI)

September 2023



**North Warwickshire
Borough Council**

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Legal Requirements

The Council recognises that in some areas of its work there are minimum legal standards for public consultation, and these will always be adhered to. The legal requirements for consultation and community involvement in plan-making and planning applications are set out by Government in legislation.

Abbreviations			
AMR	Annual Monitoring Report	NWLP	North Warwickshire Local Plan
DPD	Development Plan Document	SA	Sustainability Appraisal
LA	Local Authority	SCI	Statement of Community Involvement
LDD	Local Development Document	SPD	Supplementary Planning Document
LDF	Local Development Framework	NPPF	National Planning Policy Framework
LDS	Local Development Scheme		

1 Introduction

- 1.1 A Statement of Community Involvement (SCI) explains how the Local Planning Authority will engage with stakeholders, such as their local community and businesses, to prepare Planning Policy Documents and determine Planning Applications by describing who is consulted, how, and when.
- 1.2 North Warwickshire Borough Council's first Statement of Community Involvement was adopted in 2007 and is now being updated to reflect current legislation and guidance and improved methods of consultation.
- 1.3 The Borough Council is committed to engaging with local people, organisations and businesses to get their views on different aspects of its work. This insight helps improve council services and is a key part of making good policy decisions. Planning directly affects the places where people live and work and meaningful public consultation and engagement on all aspects of planning is vital. By maintaining community involvement at the centre of what the council does, we can gain a real understanding of our communities' priorities. This helps the council to develop the right policies and proposals for the future.
- 1.4 This SCI describes how the Borough Council will involve the community and stakeholders in the preparation and review of planning policy documents and also the consideration of planning applications.
- 1.5 The SCI, which relates to planning only, complements the council's broader commitment to effective consultation and engagement, access to information, and openness, as reflected in the council's Local Code of Corporate Governance, which outlines the core principle of 'ensuring openness and comprehensive stakeholder engagement'. The SCI is also guided by the Government's Consultation Principles: Guidance (2018) which provides guidance on how consultations should be conducted in general, by adopting a more proportionate and targeted approach.
- 1.6 For all non-planning related consultation and engagement activities, the council has developed corporate guidance on consultation, engagement and market research activity which includes an outline of the type of issues that the council consults on.

The Borough of North Warwickshire

- 1.7 North Warwickshire is the most northern Borough within the County of Warwickshire, situated in the very heart of England and covering 110 square miles. Its neighbours include the urban areas of Nuneaton, Bedworth, Tamworth, Birmingham, Coventry and Solihull, and the shire counties of Leicestershire and Staffordshire. Figure 1 below shows the location of the Borough within Warwickshire.
- 1.8 The Borough is predominantly rural in nature, with over half of its area designated as Green Belt. It is estimated that 624,850 people live in the Borough (2018 ONS UK), the population being dispersed between the small Market Towns of Atherstone and Mancetter, Coleshill and Polesworth and Dordon and a number of villages and smaller settlements, many of which are former mining communities.

Figure 1: Location of North Warwickshire within the County of Warwickshire

Source: Warwickshire County Council



2 Policy Framework

- 2.1 The duties to engage the community in planning matters and to prepare the SCI arise from the Planning and Compulsory Purchase Act 2004 (section 18) as amended by the Planning Act 2008, the Localism Act 2011, Neighbourhood Planning (General) (Amendment) Regulations 2015 and the Neighbourhood Planning Act 2017. This legislation requires the Local Planning Authority to prepare a statement for how it will involve those with an interest in development in the area, including the preparation and review of the Local Plan and Supplementary Planning Documents, Neighbourhood Plans/Orders, Community Infrastructure Levy and the consideration of planning applications.
- 2.2 There is a clear emphasis through national policy on encouraging early and consistent community involvement. The National Planning Policy Framework (NPPF) refers to early and meaningful engagement and collaboration with neighbourhoods, local organisations, and businesses so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area. The NPPF also reflects the importance of community engagement before planning applications are submitted.

- 2.3 The role of consultation in the planning system is pivotal. The legislation sets out the minimum standards for publicity and consultation which are set out in the relevant sections below. The council will always meet these requirements and, where appropriate and resources allow, will seek to go beyond them to secure wider-ranging involvement in plan-making.

3 PLANNING POLICY DOCUMENTS

- 3.1 There are various planning policy documents prepared by the council, all with different processes for preparation and public involvement. Legislation details the minimum standards for publicity and consultation. The council will always meet these requirements and, where appropriate, will seek to go beyond them to secure wider-ranging involvement. The SCI sets out the council's policy for discharging its duties by setting out how and when the local planning authority will engage and consult.
- 3.2 The Local Plan (or Development Plan Documents) is the statutory plan setting out the principal policies and proposals for land use and development in the borough. It contains the overall vision and objectives, the development strategy for the area, allocates sites for development and sets out a suite of policies used in decision making on planning matters.
- 3.3 The council maintains an evidence base to support the Local Plan/Development Plan Documents. This evidence base is wide ranging and includes evidence relating to housing, employment and retail requirements, land supply assessments, landscape, biodiversity, green infrastructure, flood risk and infrastructure. The council will undertake targeted consultation on evidence base studies where suitable to the topic and provide notifications when new evidence is published. The complete set of evidence base documents will be published and maintained on the council's website.
- 3.4 Supplementary Planning Documents (SPD) are complementary documents that provide further details and guidance to policies contained in the Local Plan and are used as material considerations in reaching planning decisions. SPD's take many forms, ranging from a master plan or development brief, to design guides and general additional guidance produced by the Council
- 3.5 The programme for the preparation and review of planning policy documents is set out in a Local Development Scheme (LDS) which lists the planning documents that the council intends to produce and the timetables for their preparation. When the LDS is updated it will be published on the council's website.
- 3.6 Neighbourhood Plans and Orders are an alternative means of developing policies and proposals at the local parish or neighbourhood level. In North Warwickshire as it has Parishes they as well as the Town Councils can prepare by the relevant town or parish council; elsewhere, by a duly constituted 'neighbourhood forum'. The council actively supports neighbourhood planning and has an important role in providing advice and support throughout the process. The town or parish council (or forum) is responsible for public consultation and engagement in the earlier stages of the process, whilst the council undertakes consultation on the final draft version of the Plan or Order (Submission stage) and organises the referendum. Following a positive referendum result a neighbourhood plan forms part of the development plan for the borough and will have the same weight as other development plan documents such as the Local Plan.

- 3.7 Each Development Plan Document is accompanied by a Sustainability Appraisal (SA) and/or Strategic Environmental Assessment (SEA) which shows how the policies reflect sustainable development objectives. The council also prepares an Authority Monitoring Report (AMR) on an annual basis to assess whether adopted planning policies are being successfully implemented and achieving the intended aims and objectives.

4 Links with other Plans and Policies

- 4.1 It is vital that the Local Development Framework process ties in with other plans and policies produced by the Council, not only to ensure effective delivery, but also to ensure that consultation on different documents is undertaken in tandem where appropriate, to limit the chances of consultation fatigue.
- 4.2 The North Warwickshire Sustainable Community Strategy will have a particular influence on the LDF. There are many elements of the Sustainable Community Strategy that have land-use or spatial planning implications. The Local Development Framework will be the mechanism by which these elements of the Community Strategy will be implemented.
- 4.3 The North Warwickshire Community Partnership are responsible for production and delivery of the Sustainable Community Strategy. The Partnership has seven theme groups which develop different theme areas of the Sustainable Community Strategy, ensure delivery of actions set out in the Strategy and help to broaden community participation. The theme groups are:
- Children, Young People and Their Families
 - Community Life
 - Education and Lifelong Learning
 - Environment
 - Health & Wellbeing
 - Local Economy
 - Safer Communities
- 4.4 The Local Development Framework will be written to reflect and work alongside the objectives of the different themes of the Sustainable Community Strategy. The Council will work with the North Warwickshire Community Partnership using presentations to the Board, discussions with individual theme groups and joint consultation processes wherever possible.

5 Who will we consult?

- 5.1 All planning policies and decisions have the potential to affect a number of people, including many who are not directly involved. The level of impact would depend on the nature of the proposals. It is important, therefore, to ensure that opportunities for involvement in the decision-making process are as wide as possible. Interested parties can range from individuals living next door to a proposed development, to a local interest group or parish council, a service provider, a government department or a neighbouring authority.
- 5.2 Regulations specify a number of organisations that local planning authorities must consult when preparing planning policy documents (Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended). They include 'specific consultation bodies and various types of 'general consultation

bodies'. Specific consultation bodies include utility companies, government agencies, local authorities and parish councils. General consultation bodies are voluntary bodies active in the area and those bodies which represent the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and persons carrying out business in the area. The council also has a legal 'duty to co-operate' with other local councils and infrastructure providers in relation to strategic cross boundary issues.

- 5.3 In addition to the individuals and organisations referred to above, it is recognised that some parts of the community are not always adequately represented such as gypsy and traveller communities in the area, the young and the elderly. The council will work closely with relevant organisations that have experience in a particular matter to find the best way of consulting and liaising with these groups.
- 5.4 In addition to the specific consultation bodies, Regulations require the Council to consult on a wider basis. The Council will consult with the General Consultation Bodies when it is considered that the matter in hand affects them.
- 5.5 The Forward Planning Team will keep a mailing list of the Consultation Bodies who wish to be kept informed of and be involved in development of the Development Plan for North Warwickshire. In addition, anyone can subscribe, via the Council's website, to a mailing list to be kept informed of the documents that the Forward Planning Team prepare. The public will be consulted through a variety of consultation methods which are detailed within this document.
- 5.6 Different sections of the Community, particularly minorities may have needs or views that are different from those of the majority and if they are not consulted effectively these needs or views may remain invisible. The Council recognises that there are certain groups that are underrepresented or not represented at all. The Council wants to ensure that no ethnic groups are excluded from public consultation exercises that it carries out.
- 5.7 The Council will ensure that consultation activities are as accessible as possible for those groups and individuals who may have an interest in the consultation process. The way in which consultation is carried out, conceived, arranged and undertaken can create or remove barriers to participation. These barriers could include:
- Methods used (for example by relying on methods which use IT or which focus only on written communication)
 - Physical barriers (for example the inaccessibility of venues or the lack of facilities at events)
 - Attitudinal barriers (the ways in which staff approach or respond to groups and individuals and the assumptions they make).
 - Financial (having the resources to undertake effective consultation)
 - Cultural (for example using inappropriate facilities or language).
- 5.8 The Council is committed to promoting equality and to considering equality issues in all aspects of consultation to ensure that its services are available for all. Officers have undertaken an equalities impact assessment on the SCI document. This assessment is a way of systematically assessing the effects that the SCI will have on an equalities group. The results of the equalities impact assessment can be seen in **Appendix B**. The Council will continue to work with existing groups / individuals and build on the links that already exist. The Council will make every effort to meet the requirements of the Equality Act 2010 and the Race Relations Act 2000.

6 How we will consult

6.1 There are a number of consultation methods that can be used to effectively engage the public. It is important that the Council considers which methods are most appropriate for each stage of production of a document. This section sets out the methods of consultation that the Council will employ when preparing its LDDs.

A) Information at the Council House

Forward Planning Officers will be available, through an appointment system, to give information and advice in person at the Council House, Atherstone. They can also be contacted by phone on 01827 719451/499 or by e-mail on planningpolicy@northwarwks.gov.uk

B) Council Website and Social Media

Local Development Documents and their supporting documentation will be available to view on the Forward Planning pages of the Council's website at <http://www.northwarwks.gov.uk/forwardplanning>. This will also include information on how and where the public can get involved in the process. Information will also be given out on the Councils Twitter and Facebook page

C) Local Newspapers

Information regarding consultation on Local Development Documents will be placed in local newspapers where appropriate, including information on how and when the public can get involved. This includes public notices and adverts.

D) E-mails

Emails will be sent out to relevant bodies and individuals on the Forward Planning Mailing List to keep them up-to-date with the progress of the LDDs, including information on how they can get involved. In exceptional circumstances, where the individual has no email address, a letter may be sent out.

E) Libraries and Leisure Centres

Local Development Documents and their supporting documentation will be made available at libraries and North Warwickshire Borough Council leisure centres alongside information on how and when the public can get involved in the process.

F) Town / Parish Councils

Information on Local Development Documents and any consultation that is being carried out will be sent to all Town / Parish Councils with a request that they should publish it on their website and make any hard copies available for public viewing.

G) Leaflets and Posters

Leaflets and / or posters will be distributed around the Borough when considered appropriate, giving information on key milestones in the production of LDDs and how and when the public can get involved in the process. This is dependent on establishments making the leaflets available and displaying the posters.

H) Presentations

Presentations by members of the Forward Planning team will be carried out at meetings such as Parish Council meetings, etc. as and when needed. These meetings may be carried out online and/or in person.

I) Roadshows / Exhibitions / Displays/ Interactive Workshops

Members of the Forward Planning Team will visit locations around the Borough to hold events so that the community can get involved with the process and meet with officer's face to face to discuss proposals. These meetings may be carried out online and/or in person.

6.2 Whilst the Council will use the same broad consultation methods for most of its Local Development Documents, there will be occasions where more in-depth methods of consultation are required. However, more in-depth methods of consultation tend to be those which are most resource intensive. It is important that the Council considers the resource implications of different consultation methods that can be applied.

6.3 Table 1 below identifies the resource implications of the different consultation methods that the Council will use.

Table 1: Consultation Methods

Consultation Methods		Resource Implications
A	Information at the Council House	Low
B	Council Website and social media	Low
C	Local Newspapers	Low
D	Emails	Medium
E	Libraries, Leisure Centres	Low
F	Parish Councils	Low
G	Leaflets and Posters	Medium
H	Presentations - online and/or in person	Medium / High
I	Roadshows / Exhibitions / Displays/ Interactive Workshops - online and/or in person	High

6.4 North Warwickshire is a relatively small Council with limited resources (both in terms of financial and staff resources) and therefore it would be unrealistic to attempt to undertake a significant amount of consultation on a wide scale. For this reason, joint consultation with other departments and organisations will be carried out where possible. The Council believes that the methods set out in this SCI are deliverable, realistic and will result in effective consultation.

7. Local Development Documents (LDDs) and Sustainability Appraisal (SA): When Will We Consult

7.1 Local Development Documents (LDDs) are documents that contain the policies which will guide future development in North Warwickshire. There are two types of LDDs that the Council will consult on: Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).

- 7.2 Development Plan Documents are spatial planning documents that are subjected to independent examination. These documents set out the planning policies relating to the development and use of land in North Warwickshire.
- 7.3 Supplementary Planning Documents expand and provide further information on the policies contained within DPDs. Whilst they are important documents, they do not have Development Plan status.
- 7.4 In writing its DPDs and SPDs the Council must consider the contribution that those documents make to sustainable development. Sustainable Development is at the core of the new planning system and effectively means *“development that meets the needs of the present without compromising the ability of future generations to meet their own needs”*¹.
- 7.5 All DPDs must be subjected to Sustainability Appraisal, which must take into consideration the social, economic and environmental implications that the document could have, in order that decisions can be made which tie in with the objectives of sustainable development. Sustainability appraisals will be subject to consultation at the same time as consultation on the relevant DPDs is undertaken.
- 7.6 The following tables provide further information on how and when the Council will consult on DPDs and SPDs.
- 7.7 The Council’s Local Development Scheme (LDS) sets out a timetable for the DPDs and SPDs that the Council intends to produce over the next 3 years. Please refer to the Council’s LDS for further detailed information on the timetable for adoption of these document

¹ World Commission on Environment and Development.

Development Plan Documents produced by North Warwickshire Borough Council

Key Stages	Opportunities for Engagement
<p>Evidence Gathering/identification of issues and options</p> <p>The council gathers relevant social, economic and environmental information, to establish a comprehensive evidence base. This evidence base is maintained as suitable and the council will provide notifications when any new evidence is published to encourage involvement in the early stages of plan making. This evidence helps to identify opportunities and constraints. Technical studies and topic papers may be prepared, drawing on monitoring of existing policies, any strategic requirements and relevant data. Consultation on the identification of issues and options or particular elements of the evidence base may also be undertaken</p>	<p>The Council will:</p> <ul style="list-style-type: none"> • Consult statutory bodies about the scope of sustainability appraisal (inc. Strategic Environmental Assessment) and relevant issues at an early stage. • Ensure targeted and early involvement of agencies and infrastructure providers to inform the technical studies and identification of issues and options. • Carry out its 'duty to co-operate' on issues which extend beyond the borough boundary with an agreed list of organisations including neighbouring authorities and infrastructure providers. • Undertake ongoing informal consultation with key stakeholders, such as parish councils, interest groups, landowners/ developers. • Notify relevant consultees, including everyone on the planning policy consultation database, when new evidence is available. • Make available all relevant evidence on the council's website and use social media, local media etc. to raise awareness of any issues and options consultations • Carry out targeted consultation on relevant evidence base studies and in relation to the identification of issues and options. • Carry out public workshops/events as appropriate (maybe on Zoom/Teams) depending on the evidence gathered and options being considered and consulted upon. Formal consultation on issues and options for a new DPD will be undertaken in line with consultation arrangements for a draft plan set out below.
<p>Regulation 18 Consultation</p> <p>The draft plan is approved for the purposes of formal public consultation (minimum of six weeks) and sets out the key issues, along with the options for addressing them. It will include preferred options where appropriate. The Plan is accompanied by the Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA) and</p>	<p>The Council will:</p> <ul style="list-style-type: none"> • Email to specific, general and all other consultees who the council consider may have an interest, including everyone on the planning policy consultation database. • Make consultation documents available on the council's website, at the One Stop Shop and other locations as considered appropriate such as libraries and leisure centres and use Social/ Local Media to

<p>also a Habitats Regulations Assessment. There may be more than one consultation on the draft Plan or targeted consultation on certain issues/policy approaches.</p>	<p>raise awareness</p> <ul style="list-style-type: none"> • Make available summary documents, leaflets and posters as appropriate • Hold public exhibitions, events and workshops or more focused meetings where appropriate (these maybe on Zoom/Teams). • Comments received will be made available (in a redacted form) on the council's website along with a summary of their content. • The council will publish a response to the consultation comments made where applicable.
<p>Regulation 19 Consultation (Pre-submission) Having considered the views and evidence gathered in response to consultation the submission Plan will be published for formal consultation (minimum of six weeks). Representations at this stage must relate to specific soundness tests. They will be forwarded for consideration to an independent inspector who will examine the plan</p>	<ul style="list-style-type: none"> • Email to specific, general and all other consultees who the council consider may have an interest, including everyone on the planning policy consultation database. • Make consultation documents available on the council's website, at the One Stop Shop and other locations as considered appropriate such as libraries and leisure centres and use Social/ Local Media to raise awareness • Discuss outstanding issues with existing forums/groups. • Hold events or workshops where appropriate in person or by Zoom/Teams • Comments received will be made available (in a redacted form) on the council's website along with a summary of their content. • The council will publish a response to the consultation comments made where applicable.
<p>Submission / Examination The Submission Plan and relevant supporting information will be submitted to the Secretary of State for independent examination. Supporting information will include representations received, a summary of the main issues raised, the background evidence and a consultation statement setting out how the council has involved the community and other stakeholders. An Inspector, appointed by the Secretary of State, will examine the Plan. It must meet the tests of soundness. The Inspector will</p>	<ul style="list-style-type: none"> • Email to specific consultees who have made representations on the Regulation 19 consultation and in accordance with the regulations • Make all relevant documents available on the council's website and use social media to raise awareness of the submission/examination <p>The Inspector /Programme Officer will</p> <ul style="list-style-type: none"> • Consider all representations made during the council's submission plan consultation • Notify all those who responded to the consultation of the hearing sessions being held to which participants may be invited. Written submissions carry equal weight to those presented at hearings

<p>consider whether the preparation of the plan has been legally compliant. If the Plan is legally compliant the inspector will then consider whether the document is positively prepared, justified, effective and consistent with national policy.</p>	
<p>Publishing the Inspectors report The Inspector who carried out the Examination will produce and publish a report. If the inspector finds the plan sound it can then be adopted in accordance with the inspector's recommendations</p>	<ul style="list-style-type: none"> • Email to specific consultees who have made representations on the Regulation 19 consultation and in accordance with the regulations • Publish the Inspector's recommendations/report on the council's website, at the council offices and other locations as considered to be appropriate. • Where appropriate use social media and local media/ press to publicise the Inspectors report
<p>Adoption If the Plan is recommended for adoption (with or without recommended modifications) the council will consider the Inspector's report and whether it wishes to adopt the document as recommended by the Inspector</p>	<ul style="list-style-type: none"> • Publish the DPD, adoption statement and other relevant evidence base documents on the council's website and use social media to raise awareness • Anyone who has asked to be notified of the adoption of the document will be notified by email.

Supplementary Plan Documents produced by North Warwickshire Borough Council	
Key Stages	Opportunities for Engagement
<p>Evidence Gathering/identification of issues and options Baseline information and evidence gathering. Undertake further technical work; identify reasonable options.</p>	<p>The Council will</p> <ul style="list-style-type: none"> • Consult with councillors, relevant stakeholders, parish/town councils, relevant agencies on the scope and content of the SPD will be undertaken.
<p>Consultation on draft SPD Formal publication for public consultation of the draft SPD along with associated evidence base documents</p>	<ul style="list-style-type: none"> • Email to specific, general and all other consultees who the council consider may have an interest including those on the planning policy consultation database who wish to be informed of planning policy documents. Discuss if relevant with stakeholders etc • Make consultation documents available on the council's website, at the Council Offices and other locations as considered appropriate and use Social/ Local Media to raise awareness. • Depending on the content, consultation may also be supported by workshops/meetings. • If the matter is specific to a location, the council will aim to engage with local residents and groups through any of the methods mentioned in Table 1
<p>Adoption of the SPD SPD is adopted by the Council. It will include a statement explaining what consultation has been undertaken and how the council has dealt with representations.</p>	<ul style="list-style-type: none"> • Make the Supplementary Planning Document, adoption statement and consultation statement available on the council's website and raise awareness by using social media • Notify any person who has asked to be notified when the SPD is adopted.

Neighbourhood Plans		
Key Stages		
	Qualifying Body will:	The Council will:
Designation of Neighbourhood Area	<ul style="list-style-type: none"> • Make request to the Borough Council 	<ul style="list-style-type: none"> • Formally publicise and consult on a neighbourhood designation application (if needed) and will publish details in relation to the designation or refusal of a neighbourhood forum. • Email specific, general and all other consultees who the council consider may have an interest (if consultation is needed). • Make documents available on the council's website, at the council offices and other locations as considered appropriate (if consultation is needed).
Preparation of the Neighbourhood Plan	<ul style="list-style-type: none"> • gather baseline information and evidence • Identify and assess options • Prepare draft Neighbourhood Plan and associated documents 	<ul style="list-style-type: none"> • Assist wherever possible • Provide relevant contact information on planning issues, information to assist consultation and publicity
Consultation	<ul style="list-style-type: none"> • Publicise the draft plan and invite representations for a minimum of 6 weeks • Consult the appropriate consultation bodies as appropriate • Consider the representations and make any amendments if appropriate • Prepare consultation statement and basic conditions statement 	<ul style="list-style-type: none"> • Continue to support and provide informal advice and support and send a formal response to the consultation
Finalise SPD	<ul style="list-style-type: none"> • Review representations received and make any changes to SPD where justified. 	<ul style="list-style-type: none"> • Comments received will be made available on the council's website (in a redacted form) along with a summary of their content. • The council will publish a schedule of its response to the comments made. • Further consultation may be undertaken if responses lead to a significant change of direction.

Submission to LA	<ul style="list-style-type: none"> • Submit plan to LPA along with Basic Condition's Statement and Consultation Statement • Agree to appointment of Independent Examiner 	<ul style="list-style-type: none"> • If plan meets legal requirements it will formally publicise and consult for a minimum period of 6 weeks • Consult with all specific consultees and any others referred to in the consultation statement • Make documents available on website, council offices and other appropriate locations • Use social media if appropriate to publicise the consultation • Appoint Examiner • Send all representations to the Examiner
Examination	<ul style="list-style-type: none"> • Examiner issues a report to the LA and qualifying body • Makes any recommended changes alongside the LA 	<ul style="list-style-type: none"> • Make arrangements for the Examination of the plan • Submit the plan and all relevant documents to the examiner • Publish the examiner's report on the website • If the LA is satisfied the plan meets the basic conditions the neighbourhood plan proceeds to referendum • Makes any recommended changes alongside the qualifying body
Referendum	<ul style="list-style-type: none"> • Raise awareness of referendum through publication of neutral material 	<ul style="list-style-type: none"> • Make arrangements and publish information statement and notice of referendum • Publish referendum results on website
Adoption		<ul style="list-style-type: none"> • If more than 50% vote in favour, the Council "makes" the plan via Full Council • Publish the "made" plan on the website
Monitoring and Review	<ul style="list-style-type: none"> • Qualifying body undertakes monitoring of the plan and review when necessary 	<ul style="list-style-type: none"> • Advise on options, process for reviewing the plan

Reporting Back

- 7.7 It is important that the community and other stakeholders are informed of how their comments are considered by the Council. As part of the process of preparing documents, the Council must prepare a consultation statement for each of its DPDs and SPDs. For Development Plan Documents, the report will be prepared before the DPD is submitted to the Secretary of State. For Supplementary Planning Documents, the report will be produced before the Council adopts the document. The statements will set out who was consulted, how they were consulted and summarise the main issues brought up by the consultations, including how the Council has addressed those issues. Importantly the statement will show whether the Council has followed this SCI in undertaking its consultation. The consultation statements will be made available on the Council's website.

8 CONSULTING ON PLANNING APPLICATIONS

- 8.1 The previous sections of this document have highlighted how the Council will involve the community and other stakeholders in the preparation of its Local Development Documents. However, more often than not, the communities, and particularly an individual's involvement with the planning process will be as a consequence of the submission of a planning application.
- 8.2 The requirements for notification of planning applications are set out primarily in the Town and Country Planning (Development Management Procedure) Order 2015. The Government set out the minimum level of publicity that it expects is needed to enable the community and individuals to have the opportunity to comment on development proposals. However, this is often seen as being too limited, and experience shows that most Local Planning Authorities go beyond this level of notification. However, any system for publicising planning applications cannot be guaranteed, however extensive. The nature, scale and type of planning application will determine how we will engage with the Community. There needs to be a balance between providing a reasonable opportunity for inviting public comment, considerations of speed of decision and the cost of that publicity.

9 The Application Process

- 9.1 When an application for planning permission is submitted to the Council, it is checked to see that the correct information has been submitted with the application. Details on the information that the Council requires to be submitted with an application, is set out in the document 'Checklist for Applicants Submitting Planning Applications' which is available on the Council's website www.northwarks.gov.uk. This document will be updated with a guidance note taking into account any new Government requirements.
- 9.2 If further information is needed in order for a planning officer to determine the application, it is put on hold whilst the applicant or their agent is contacted. If the application includes sufficient information, consultation letters are sent out and the application is passed on to the relevant case officer.
- 9.3 The Case officer then considers the application in accordance with the Development Plan, any other material consideration and any representations that have been submitted through consultation. If any amendments are made to the application there may be a need to re-advertise and consult again on the changes, although this will depend on the changes that have been made to the scheme.

- 9.4 The determination of all planning and related applications is delegated to the Council's Planning and Development Board or delegated to the Head of Development Control. The Scheme of Delegation sets out how planning applications are determined and when and why they are determined by the Planning & Development Board and is available on the Councils' website². There may be occasions where it is necessary for the Council to refer planning applications to the Government Office for the West Midlands, for example in the cases of major departures from the Development Plan.
- 9.5 The majority of planning applications are determined under powers that have been delegated to officers. Only a limited number of applications are considered and determined by the Planning & development Board which meets monthly, in accordance with the Council's constitution. Decisions are taken having regard to the Councils adopted Local Plan, and any adopted Neighbourhood Plans, which are the legal basis for all decisions, unless material considerations indicate otherwise.
- 9.6 The government sets targets for the time taken to determine planning applications. These are currently 13 weeks for major applications and 8 weeks for all others. If an Environmental Impact Assessment is required by the scale of development then this period will extend to 16 weeks. Before a decision is made the case officer will prepare a report with a recommendation. The recommendation will take into account the policies within the adopted Local Plan, the National Planning Policy Framework, Planning Practice Guidance as well as any consultation comments received. The Borough Council can only take into account comments relating to material planning considerations.

Pre-Application Discussions

- 9.5 Applicants or developers are expected to consult with the local community before submitting planning applications which are likely to generate public interest. Such consultation should be accessible and clear to the whole community.
- 9.6 The council welcomes and encourages discussions with applicants before planning applications are submitted. Providing considered advice prior to the formal submission of a planning application can ensure that the quality of a development is improved and that certainty in the outcome can be increased for the applicant.
- 9.7 Seeking pre-application advice gives applicants the opportunity to discuss the principle of the development proposals with an officer. It also enables officers to identify any potential issues and provides a number of benefits:
- Providing an opportunity to better understand how an application will be judged against the policies in the development plan and other material considerations.
 - Identifying, at an early stage, where there is a need for specialist input such as with regard to listed buildings, trees, landscape, green Infrastructure and natural green space noise, health, contaminated land or archaeology.
 - Providing the opportunity to modify a proposal to make it potentially more acceptable to the council and anticipating other regulatory requirements.
 - Improving the design and quality of the finished scheme.
 - Indicating at an early stage if a proposal is unacceptable, saving the cost of pursuing a formal application.
 - Avoiding rejection at registration stage or early refusal of permission because of inadequate or insufficient information.

² Scheme of Delegation in Respect of the Determination of Planning Applications, June 2014

- Allowing discussions on and the preparation of legal agreements, where appropriate, in advance of an application being received and for negotiations to consider land value constraints.

Further information on this service, can be found at:

https://www.northwarks.gov.uk/info/20027/development_control/1142/planning_guidance

- 9.8 For minor developments (such as householder developments) the pre-application discussion may only be a letter from or informal telephone conversation with a planning officer. The planning officer will give their initial comments on the principle of the development and may also consult with officers in the planning policy division to gain their views. Householders are encouraged to discuss any ideas for development with their neighbours.
- 9.9 Major developments are more significant proposals and therefore will involve more discussion at pre-application level. A major application is one which involves either:
- Residential development comprising 10 or more dwellings **or** if the number of dwellings is unknown, the site area is 0.5 hectares or more; **OR**
 - Any other use where the floorspace proposed is 1,000 square metres or more **or** if the site area is one hectare or more.
- 9.10 It is likely that pre-application discussions on a major development will involve an exchange of letters and discussion between the applicant and planning officers. The extent of this exchange will vary depending on the size of the development. Officers recommend that the applicant undertakes consultation at the pre-application stage in order to gain an appreciation of how well the proposal is likely to be considered.
- 9.11 The Council also operates a Duty Planning Officer system to deal with simple enquiries, as well as offering general planning and procedural advice. This is available between 9am and 1pm from the Council Offices or on the phone on 01827 715431.
- 9.12 We will also encourage applicants to undertaken pre-submission consultation with neighbours and local communities prior to making an application. Pre-application discussion should also include the key consultees on the type of development proposed such as the Local Highway Authority, Local Lead Flood Authority, the Highways England, and Environment Agency. These consultees may well charge for any pre-application advice.

10 Consultation During the Application Process

- 10.1 The points at which consultation is undertaken during the application process is shown in **Appendix X**. Consultation / publicity given to planning and related applications can generally be divided into three areas. Each will be looked at in turn below
- Statutory Consultation
 - Community Representation
 - Neighbour Notification
- 10.2 In all cases, only representations that relate to relevant planning considerations will be taken into account by the Council. Too often, comments received relate to considerations that are not planning matters. These have to be given little or no weight. A list of the most common considerations that are not planning matters is attached at **Appendix X**.

- 10.3 Representations made should be in writing so that there is no misunderstanding as to the nature of the content. All representations received have to be placed on the public file, and so any comments made “in confidence” cannot be considered. Because the process has to be transparent and open, anonymous comments will not be given great weight in the assessment of applications. Petitions are often received. It is important to give planning reasons for objections. Furthermore, the determination of applications is based on planning arguments, not the number of signatories. The Council will be mindful of its duties under the various equality and diversity legislation (e.g. Race Relations Amendment Act 2000, Disability Discrimination Act, Sex Discrimination Act) and will disregard any objection which contains unlawful discrimination or discriminatory comments.

Statutory Consultation and Publicity

- 10.4 The Council will consult Statutory Consultees. These are prescribed by Regulation³, and some of which are set out below.
- Ancient Monuments Society
 - Birmingham International Airport Ltd
 - British Waterways Board
 - The Coal Authority
 - Council For British Archaeology
 - Civil Aviation Authority
 - Department for Environment, Food and Rural Affairs
 - English Heritage
 - Environment Agency
 - Georgian Group
 - Government Office for the West Midlands
 - Health and Safety Executive
 - National Highways
 - Natural England
 - North Warwickshire Parish Councils
 - Royal Fine Arts Commission
 - Society for the Protection of Ancient Buildings
 - Sport England
 - Victorian Society
 - Warwickshire County Council
- 10.5 Not all of these bodies are consulted on each application. Who to consult will vary with the nature of the planning application, its location and the requirements of the Regulations. All of the Statutory Consultees are obliged to respond within 28 days. If they wish to extend this period, then they have to do so in writing.
- 10.6 There are also a number of non- statutory consultees who may be consulted depending on the location or type of application. These are set out in **Appendix X**.
- 10.6 Similarly, the Council is under a Statutory Duty to publicise some applications in the press and on-site. A list of these occasions is set out in **Appendix X** and is again prescribed by Regulation⁴.

³ Town and Country Planning (Development Management Procedure) (England) Order 2015, Town and Country Planning (General Development Procedure) Order 1995 (as amended), The Planning (Listed Building and Conservation Areas) Regulations and the Listed Buildings and Conservation Areas Act 1990

- 10.7 In North Warwickshire the papers that receive such Notices are the Atherstone, Coleshill and Tamworth Heralds. The same Notice is also displayed on site where necessary. If it is not possible to attach the Notice to the site, it will be displayed as appropriate so that it can be seen by members of the Public.

Community Representation

- 10.8 A list of planning and related applications registered by the Council is produced each week. Copies are sent to all Councillors, all Parish and Town Councils and to a wide range of interest groups and bodies. Requests to be included for e-mail circulation of this list should be made to the Planning Support Team (01827 719231, 719226, 719233, 719235, 719286). The weekly list can also be viewed and downloaded from the Councils website at www.northwarks.gov.uk/planningcontrol.
- 10.9 Parish Councils are consulted electronically on planning applications within their parish, which means they are able to access the planning application by viewing the details on line.
- 10.10 Applications that are substantive proposals (such as major departures from the Development Plan) will often be made available for inspection in the Public Libraries in the Borough at Atherstone, Baddesley, Dordon, Coleshill, Hartshill, Water Orton, Polesworth and Kingsbury. These occasions will be at the discretion of the Council's Planning Control Manager.
- 10.11 All interest groups, bodies and individuals are requested to respond to the plans, if they wish to do so, within 21 days of notification.

Neighbour Notification

- 10.12 Individual members of the Public can request to be included on the weekly list circulation by E-mail (free), or they can view the list on the Council's website.
- 10.13 Site notices are often displayed at sites so that they are noticeable by members of the public. Where not, the relevant case officer will decide whether it is appropriate or not to display a Notice. This however is not the preferred means of notification.
- 10.14 The preferred method of neighbour notification is a letter inviting comments on the proposal. The letter informs the neighbour of the receipt of the application, what is generally proposed, where the plans can be inspected (online usually, or if necessary at the Council Offices) and the contact information of the case officer. Written observations are invited within 21 days. The Council cannot guarantee that representations submitted after the 21 day period will be taken into account. If a neighbour has particular difficulty in accessing the Council Offices to view plans, then alternative arrangements can be made via the case officer. Copies of plans are available at a charge).
- 10.15 Occupiers of premises most likely to be directly affected by a proposal will receive a neighbour notification letter. As a general rule this means that at a minimum, the adjoining occupiers to a proposal, and / or those occupiers who may face the proposed development, for instance on the opposite side of a road. The most common form of planning application received is for 'householder' development –

⁴ Town and Country Planning (General Development Procedure) Order 1995 (as amended), and the Listed Buildings and Conservation Areas Act 1990 & Circular 15/92

e.g. extensions, loft conversions, conservatories. Where these are single storey proposals then only immediate neighbours will be notified, but where they are for two-storey proposals, then notification will be wider. Appendix X illustrates how this might work in practice. If there is doubt concerning whether a notification should take place, then that notification will happen.

10.16 For all other types of application, notification will be undertaken using the following factors for guidance:

- Those neighbouring a site
- Those overlooked by a proposal
- Those where there may be an environmental impact
- Those where the character or appearance of an area may be affected, visually or physically.

10.17 Case officers will have discretion on whom to notify, but matters such as topography, setting, character and amenity will all be taken into account.

10.18 A summary of the consultation which the Council will undertake on planning applications is shown in Table 3 below.

Table 3: Consulting on Planning Applications

Statutory Consultation	Community Consultation	Neighbour Notification
<ul style="list-style-type: none"> • Statutory Consultees are consulted as and when necessary, depending on the application • Notices are published in the Atherstone, Coleshill and Tamworth Heralds • Notices are placed at the site or as close to the site as possible where the public can see them 	<ul style="list-style-type: none"> • Weekly list of applications being submitted to the Council, alongside those applications which have been determined, are available on the Council's website or via e-mail • Electronic consultations are sent to relevant Parish or Town Clerks. • Application forms and plans are available to view online or if necessary, at the Council House. • Information on substantive proposals is often available at libraries in the Borough. 	<ul style="list-style-type: none"> • Weekly list of applications being submitted to the Council, alongside those applications which have been determined, are available on the Council's website or via e-mail • Notices are placed at the site or as close to the site as possible where the public can see them • Letters inviting comment are sent to the occupiers of premises most likely to be affected by the proposal.

Consultation on Major Applications

10.19 Major applications by their nature are likely to create a wider interest than minor applications. This is reflected in the fact that the Council has 13 weeks within which to determine a major application compared to the usual 8 weeks for minor applications.

10.20 Consultation on major applications is wider than that set out in Table 3 but the precise nature of the consultation will vary dependent on the scale of the proposal.

Other Involvement

- 10.21 The Division has regular Annual meetings with Parish and Town Councils and there is an annual questionnaire, which is forwarded to each in order to look at procedures, expectations and satisfaction. Annual questionnaires are also sent to those who submit applications and to those who have responded to neighbour notification letters.
- 10.22 If appropriate, case officers will attend public meetings, Parish Council meetings or meet groups of residents to explain planning applications.
- 10.23 In some circumstances case officers will be able to meet individual members of the public and to discuss the proposal by prior appointment. The development Control section offer a duty officer system from 9.00am-13:00pm Monday to Friday. The duty officer can be contacted on 01827 715341.
- 10.24 There is a formal complaint's procedure that can be invoked if appropriate. Further information on the procedure is available from the Council's website.

Consultation on Amended Proposals

- 10.25 Sometimes a considerable amount of negotiation takes place on applications, particularly major ones. This is an important and a crucial part of the process, steering development proposals towards a more acceptable form, therefore acting in a positive manner, often responding to community concerns. This dialogue is encouraged by Government.
- 10.26 This process often leads to the submission of amended plans. The Council's policy towards re-notification of the community is outlined in a Practice Note⁵. Essentially this says that, if an amendment is a direct result of a Statutory Consultee's representations, and no other representations have been received, there will be no re-notification with the community. If an amendment is a direct result of a community or neighbour representation, then all those who have written in following the initial notification will be re-notified – often with a shorter response period. If an amendment is submitted as a consequence of a variety of matters, then re-notification will take place as per the original application. Often a representation can be resolved through a condition and case officers may discuss this resolution directly with the representor rather than re-notify formally. All of these arrangements will also be followed if, after the grant of permission, amended plans are received. Copies of the Amendment Best Practice Note are available direct from the Planning and Development, and from the website.

11 Other Types of Application

- 11.1 The procedures set out above relate to planning and other related applications – e.g. those for Listed Building or Conservation Area Consent, as well as for Advertisement Consent or Consent under the Tree Preservation Order Regulations. There are two specific other types of application where different procedures will apply – those for Certificates of Lawful Development, and Prior Approval Determinations.

⁵ Practice Note for Handling Amendments to Planning Proposals, 2013

Advertisement Consent Applications

- 11.2 These applications seek a determination from the Council as to whether a particular sign is acceptable from an amenity and public safety perspective. We will consult with neighbouring properties. **Parish/Town Council's**. The Council's Conservation Officer if the application site is in a Conservation Area or on a listed building. The Highway authority will be consulted if the sign is illuminated or is fronting a public highway.

Certificate Applications

- 11.3 These applications seek a determination from the Council as to whether a particular existing or proposed development is, or would be lawful. They deal wholly with technical and evidential matters and not with the merits of a case. In these cases, whilst the applications appear on the weekly list and copies of them are made publicly available, neighbour notification will not be generally undertaken. If it does, a bespoke letter will be sent to individuals explaining the nature of the application and the information that is requested from them.

Prior Approval Determinations

- 11.4 This type of determination is NOT a planning application. In particular, they relate to some forms of agricultural development, residential conversion, retail conversion, larger homes extensions, demolition work and telecommunication development.
- 11.5 These developments already benefit from a planning permission in principle, and the referral to the Council is solely to see if the Council wants to give approval to detailed matters before the development goes ahead. However, some consultation may be undertaken depending on the nature of the proposal and whether local knowledge is appropriate to the situation. Prior approvals can include a number of considerations for example highways, noise, contamination, siting and appearance. The Council only has 28 (for certain agricultural development and demolition) or 56 days (for any other proposals) in which to respond. If it does not, then the proposal is entitled to go ahead.
- 11.6 In these circumstances, the prior approval applications appear on the weekly list, and only in the case of agricultural and demolition prior approval will no neighbour notification take place (because it has the shorter 28-day period).

Hedgerow Removal Notices

- 11.7 In these circumstances we will consult Parish/Town Councils. The Council's Tree Officer and Warwickshire Archaeology. Any other relevant statutory consultees.

Tree Preservation Orders (TPOs)/works to trees protected by TPO's

- 11.8 We will consult neighbours and we will consult Parish/Town Councils. The Council's Tree Officer. Any other relevant statutory consultees.

Works to Trees in a Conservation Area

- 11.9 We will only consult Parish/Town Councils. The Council's Tree Officer due to the limited time in which to deal with this notification.

Discharge of Conditions

- 11.10 We will only consult relevant statutory consultees. Only in exceptional circumstances will we consult neighbouring properties.

Non-material amendments

- 11.11 Only in exceptional circumstances will we consult neighbouring properties.

12 How are applications determined?

- 12.1 Some 90% of planning applications are determined under delegated powers by authorised officers of the Council. However, some major and/or controversial applications are reported to the Planning & Development Board for decision by Members of the Council. If an application is to be determined in this way we will inform the applicant/agent and anyone who has submitted comments on a particular application (including the Parish Council/Town Council) of the date of the meeting and their right to speak at the meeting. Ordinarily there is a right for objectors or supporters, the applicant or agent and a Parish Council representative to speak at the Planning & Development Board. Planning decisions are uploaded to the Council's website. In addition, anyone who submitted comments in respect of a particular planning application will have to search for the decision on the website.

13 Alleged Breaches of Planning Control

- 13.1 Most alleged breaches of planning control arise following a referral from a member of the public. All referrals must be treated confidentially under Section 12a of the Local Government Act (1972). There is no consultation with the public on these cases. Very often they can be resolved through the submission of a retrospective planning application which is then treated in the normal way as described above. The Council's procedure for handling enforcement matters is available from the Division and on the website.⁶

14 Data Protection and Copyright

- 14.1 When making Planning and Building Regulation Applications, the personal data and information that is provided in connection the application will appear in a public register and will, in the near future, be published on the local authority's website. If an individual has any specific concerns about the publication of personal data they should indicate that they do not wish Council to include their details on the website. This data will however still appear in the Register held at the Council Offices.
- 14.2 For further information on how we hold your data please view our Privacy Notice https://www.northwarks.gov.uk/info/20119/customer_services_and_visiting_us/1456/privacy_statement_and_notice

15 Review and Monitoring of the SCI

- 15.1 It is important that the Council reviews the effectiveness of the SCI and the consultation methods employed within it. It may become apparent that some consultation methods are not proving effective in engaging the community and other

⁶ Policy for Investigating Unauthorised Development and the Enforcement of Planning Control, April 2023

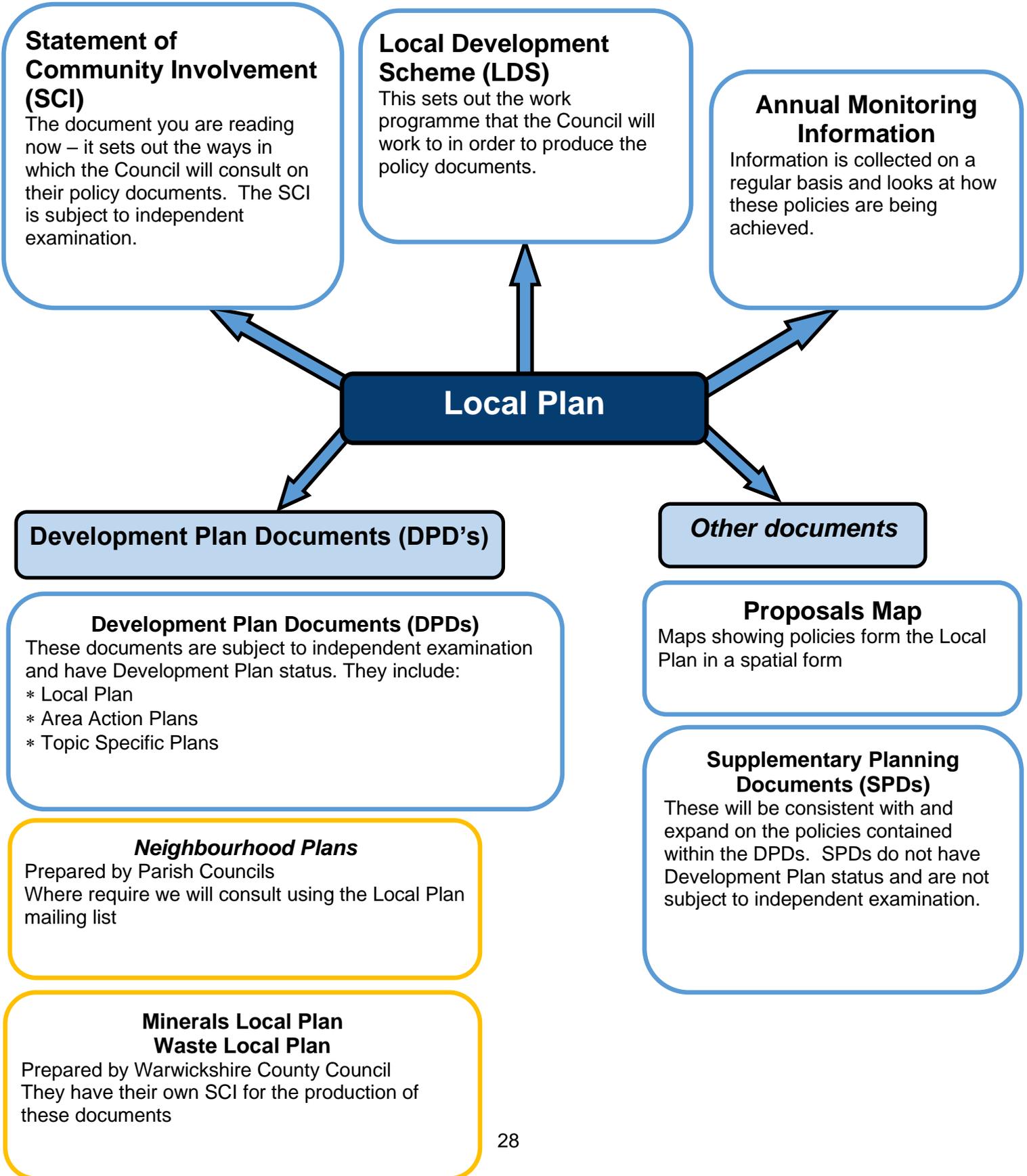
stakeholders, or legislative changes may result in a need to change how the Council consults. In these cases, the Council will review the use of those consultation methods and introduce new, more appropriate ways of consulting the community and other stakeholders.

- 15.2 The Council's Annual Monitoring Report is the most appropriate vehicle by which to undertake review and monitoring of the SCI. Monitoring information which considers the effectiveness of the SCI will be included in the Council's Annual Monitoring Report.

Appendices

A	Local Development Frameworks	
B	Equality Impact Assessment	
	Determination of a Planning Application	
	Relevant Planning Considerations	
	Non-Statutory Consultees for Planning Applications	
	Occasions where the Council is under a Statutory Duty to publicise applications	
	Neighbour Notification Guide	
	Abbreviations Used in this Document	

Local Policy Documents



Equality Impact Assessment Summary Sheet

Please complete the following table summarised from the equality impact assessment form. This should be completed and attached to relevant Board reports.

Name of Policy Procedure/Service	Statement of Community Involvement
Officer Responsible for assessment	Dorothy Barratt

Does this policy /procedure /service have any differential impact on the following equality groups /people:

- (a) *Is there a positive impact on any of the equality target groups or contribute to promoting equal opportunities and improve relations or:*
- (b) *could there be a negative impact on any of the equality target groups? i.e. disadvantage them in any way*

Using the different types of measures incorporated into this SCI will try to reach all of the following groups and individuals. Extending the use of social media and being able to carry out online presentations and meetings, especially for planning policy documents, will also try to reach those with a disability or caring responsibilities. Ensuring that in person meetings or appointments are also available will ensure that those not able or wanting to access through the use of technology are still able to access the various consultations.

Equality Group	Positive impact	Negative impact	Reasons/Comments
Racial	x		
Gender	x		
Disabled people	x		
Gay, Lesbian and Bisexual people	x		
Older/Younger people	x		
Religion and Beliefs	x		
People having dependents caring responsibilities	x		
People having an offending past	x		
Transgender people	x		
Armed Forces Covenant	x		

*If you have answered **No** to any of the above please give your reasons below*

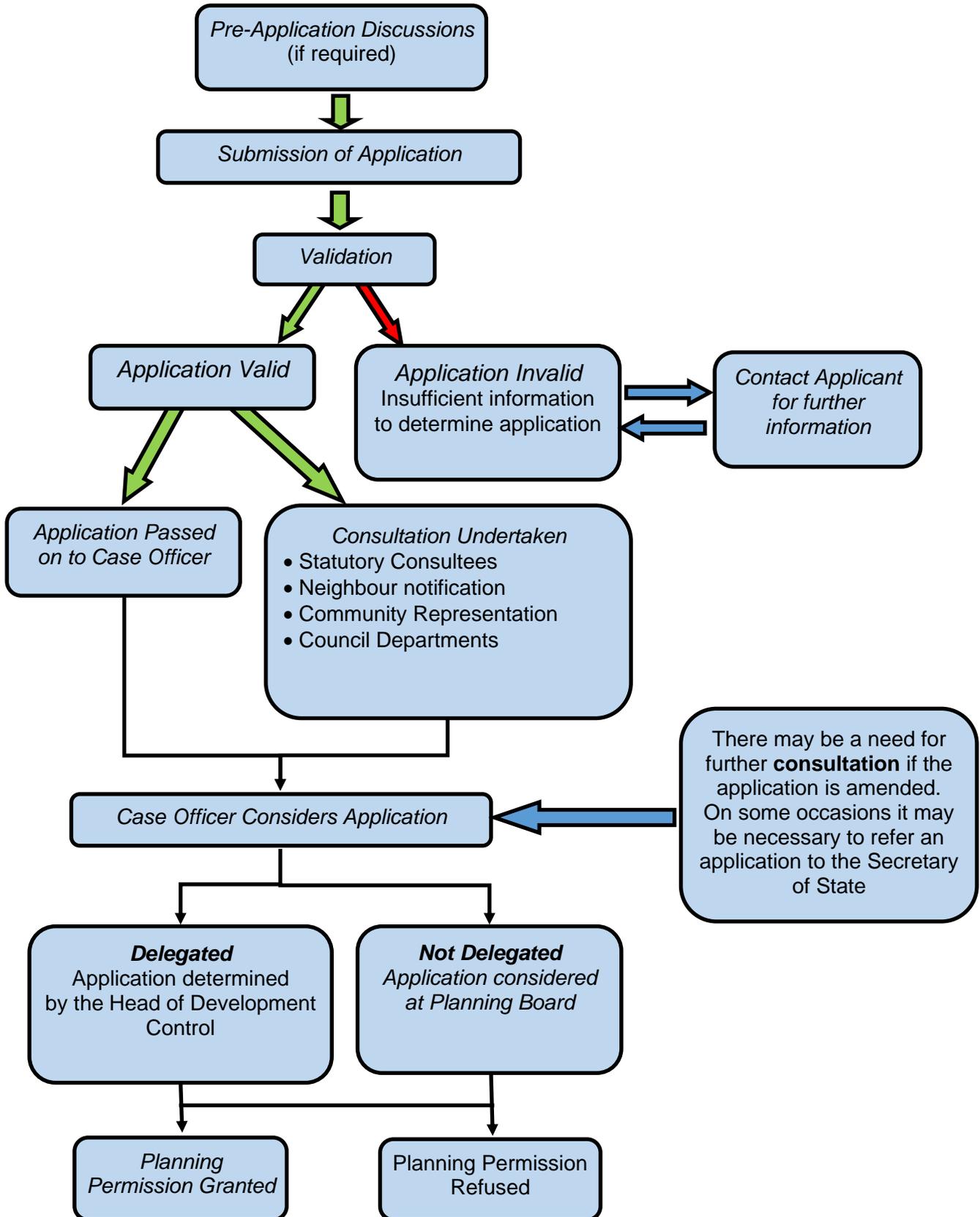
Please show if you believe that this document:

- *should proceed to a further Impact assessment, or,*
- *needs no further action.*

It is considered progression to a full impact assessment is **not** needed.

It is proposed to ask if those completing any representations fill in an equalities impact form to seek their view of any adverse issues that have not been picked up during this assessment.

Determination of a Planning Application



Relevant Planning Considerations

The most significant planning considerations are:

• The Development Plan (Local Plans, Minerals Local Plan, Waste Local Plan, Neighbourhood Plans)
• Adopted Local Authority Planning Guidance / Supplementary Planning Documents
• Government Guidance (NPPF, Planning Policy Guidance Notes and Ministerial Statements)
• Planning Legislation
• Highways Issues (Safety, capacity and different modes of travel)
• Design, Appearance and Layout
• Residential Amenity (overlooking, loss of privacy)
• Impacts on the Environment and Character of a Neighbourhood

The following matters are not relevant planning considerations:

• Matters covered by and enforced by other legislation
• Property rights – boundary and access dispute, covenants
• People's Motives
• Speculation
• Loss of View
• Property Value
• Any form of Prejudice – including moral objections to uses
• Trade objections from potential competitors
• The fact that a development has already begun or been completed unless it is a listed building

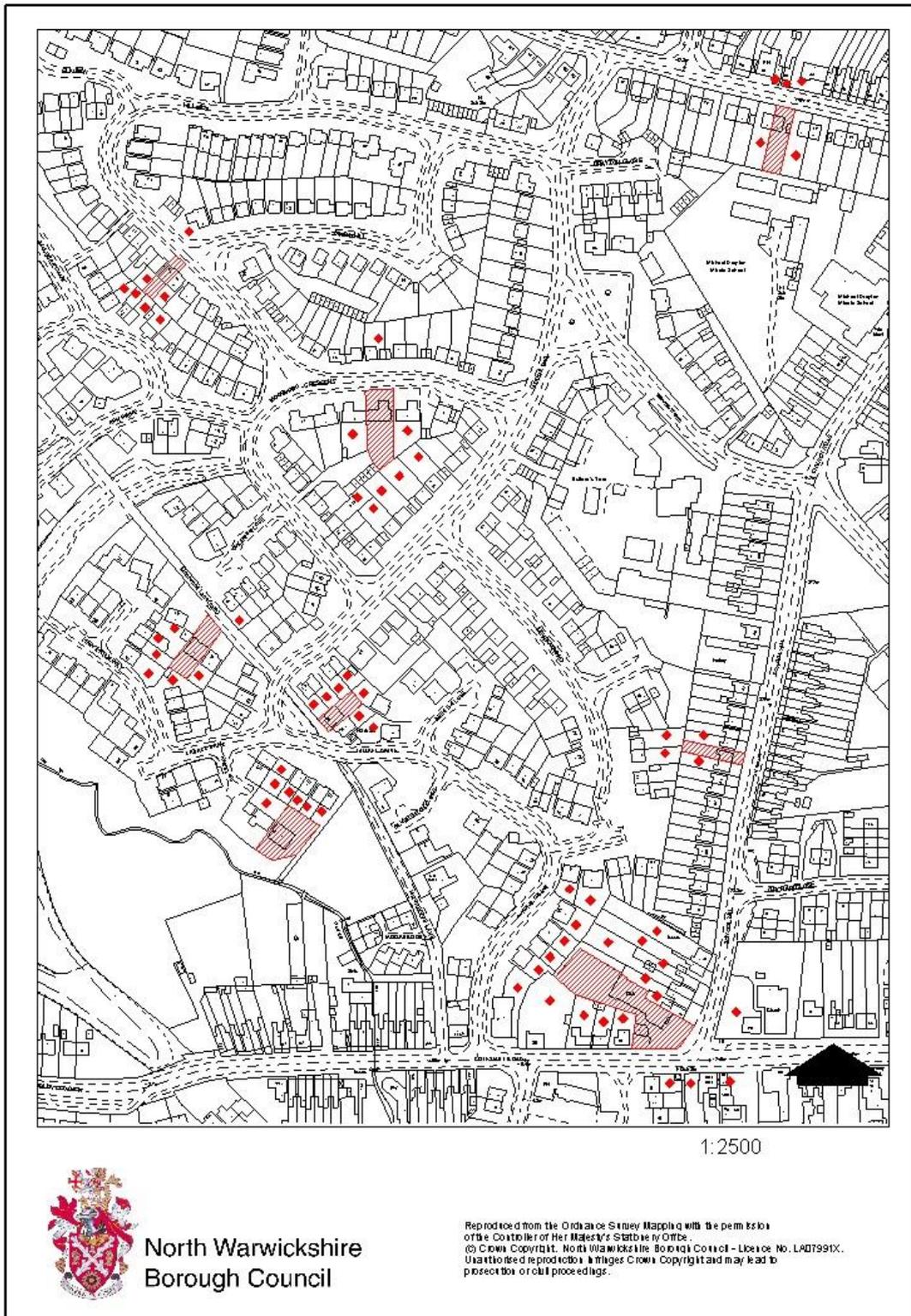
Non-Statutory Consultees for Planning Applications

- Atherstone Civic Society
- British Horse Society
- British Telecom
- Coleshill Business Action Group
- Coleshill Civic Society
- CPRE
- East Midlands Electricity
- English Golf Union
- Forestry Commission
- FRAC
- Garden History Society
- Haunch Lane Residents Association
- Heart of England Tourist Board
- Inland Waterways Association
- Marston Residents Association
- National Care Standard Commission
- National Farmers Union
- National Grid Company
- Network Rail
- North Warwickshire Access Group
- Open Spaces Society
- Post Office Property Holdings
- Radio Communications Agency
- Ramblers Association
- RSPB
- Severn Trent Water
- The Camping and Caravan Club
- The Polesworth Society
- Transco
- Warwickshire Ambulance Service
- Warwickshire Primary Care Trust
- Warwickshire Rural Community Council
- Warwickshire Wildlife Trust
- Woodland Trust

Occasions where the Council is under a Statutory Duty to Publicise Applications

- Applications accompanied by an Environmental Statement
- Proposals that depart from the Development Plan
- Development affecting a public right of way
- Major developments
- Development affecting the setting of a Listed Building
- Development affecting the character or appearance of a Conservation Area
- Development likely to create a wider concern – to include:
 - a) Those applications affecting property by causing noise, smell, vibration, dust or other nuisances
 - b) Attracting crowds, traffic, and noise in generally quiet areas
 - c) Causing activity or noise during antisocial hours
 - d) Significant change e.g., tall buildings
 - e) Serious reduction or loss of light, privacy, beyond adjacent properties
 - f) Affecting setting of an Ancient Monument
 - g) Affecting trees subject to Tree Preservation Orders

Neighbour Notification Guide



The plan above shows hypothetical examples of how neighbour notification works. The shaded areas are the sites subject to an application, and the dotted premises are the premises that would be sent neighbourhood notification letters.

Agenda Item No 8

Local Development Framework Sub-Committee

11 September 2023

Report of the Chief Executive

Draft Employment Development Plan Document – Scope, Issues and Options for Consultation

1 Summary

- 1.1 This report seeks authority to consult on a Draft Employment Development Plan Document – Scope, Issues and Options.

Recommendation to the Sub-Committee

That the Draft Employment Development Plan Document – Scope, Issues and Options is approved for consultation.

2 Consultation

- 2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.

3 Background

- 3.1 When developing policies for inclusion in a Development Plan Document (DPD) the starting point is to look at the scope of the document, the range of issues it should address, and, where possible, develop options. The Employment DPD is at this early point in the process.
- 3.2 The refreshed Draft North Warwickshire Economic Development Strategy was approved for consultation at Executive Board on Tuesday, 21 March 2023 and will be published for consultation alongside the Employment DPD as well as a range of other documents listed in the next steps below.

4 Draft Employment DPD

- 4.1 The North Warwickshire Local Plan was adopted in September 2021 and includes a range of employment related policies. Policy *LP6 – Additional Employment Land* seeks to provide advice on how to deal with planning applications for large strategic employment sites. At the Local Plan Examination none of the objectors or agents for representations received could provide an amount of land that the Borough Council should seek to deliver for strategic employment. As a result, LP6 was introduced as a way forward until such time there was evidence to determine the amount of strategic employment land that the Borough Council should consider delivering.

- 4.2 As part of the production of evidence to inform and support this DPD a ‘West Midlands Strategic Employment Sites Study’ (WMSESS) is currently being produced and a Draft Report is expected in Winter 2023. It is hoped this document will help address this strategic site issue on a regional and sub-regional basis.
- 4.3 Similarly, the Housing and Economic Development Needs Assessment (HEDNA) November 2022 for the Coventry and Warwickshire area also forms part of the evidence and guidance for the Employment DPD, particularly around identifying potential employment land needs by type and use. The HEDNA was introduced to the Local Development Framework Sub-Committee at its meeting on 4 January 2023.
- 4.4 The draft Employment DPD identifies a range of issues that could be addressed following the examination and adoption of the Local Plan and as a consequence of more up to date evidence. The Draft DPD also looks at emerging employment related issues, particularly in relation to climate change, consultations underway on changes to the National Planning Policy framework and a series of changes both proposed and already introduced to the Town and Country Planning (General Permitted Development) (England) Order 2015, relaxing regulation for changes of use to dwellings from commercial premises and farm businesses/buildings, as referenced in the Planning and Development Board report dated 4 September 2023.
- 4.5 The Draft Employment DPD Scope, Issues and Options Report asks a series of questions and poses a number of options on how to address these issues raised. The draft DPD document has been produced and is attached as Appendix A.
- ...

5 **Next Steps**

- 5.1 If approved, consultation on the Draft Employment Development Plan Document – Scope, Issues and Options will take place later this year. It will be included in the consultation on a range of documents, which will include the following:
- a. Draft Sustainability Appraisal Scoping Report
 - b. Updated Statement of Community Involvement (SCI)
 - c. Draft Employment DPD
 - d. Draft Economic Development Strategy
 - e. Draft Gypsy and Traveller DPD
 - f. Call for Sites

Call for Sites

- 5.2 Part of the process includes undertaking a call for sites. It is proposed that this will be carried out but very broadly to encourage as many sites to be submitted and for a wide range of uses and needs. These will then be assessed. However, it should be noted that depending on the number of submissions not all sites will be assessed in detail.

6 Report Implications

6.1 Finance and Value for Money Implications

- 6.1.1 Further work may be needed to be undertaken by consultants if specific work around Employment Needs or Strategic Sites is necessary. If this is considered necessary, it would be funded from the Local Plan budget (code 2009).

6.2 Legal, Data Protection and Human Rights Implications

- 6.2.1 This DPD will enable the Borough Council to fulfil their planning responsibilities to address economic, employment and other commercial development needs as required by the current National Planning Policy Framework. This work will be undertaken in line with the requirements of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

6.3 Environment, Sustainability and Health Implications

- 6.3.1 The Employment Development Plan Document – Scope, Issues and Options, along with the associated Scoping Report and then the full Sustainability Appraisal will help identify any social, economic or environmental issues that need to be addressed by avoidance or through mitigation where possible in this and future Development Plan Documents.

6.4 Risk Management Implications

- 6.4.1 There are no risk management implications considered applicable to the production of the DPD apart from the potential failure of addressing employment and economic needs through the Local Plan process as required by guidance, statute and regulations.

6.5 Equalities Implications

- 6.5.1 An equality impact assessment has been carried out on the Local Plan which sets out the overarching spatial vision for the Borough over the next 14 years and to which the Draft Employment Development Plan Document will conform as well as with the National planning policies applying under the current NPPF2021. If significant policy changes arise as a result of the consultation on this DPD and associated Sustainability Appraisal Scoping Report, a stand-alone equalities impact assessment will be undertaken. There are no further equalities implications considered applicable.

6.6 Links to Council's Priorities

6.6.1 The delivery of the DPD's listed in the Local Development Scheme and relevant services and infrastructure needs generated by development is linked to all of the Council's priorities.

The Contact Officer for this report is Mike Dittman (719451).

Background Papers

Local Government Act 1972 Section 100D, as substituted by the Local Government Act, 2000
Section 97

Background Paper No	Author	Nature of Background Paper	Date
Draft Employment Development Plan Document – Scope, Issues and Options Report	Dorothy Barratt	Draft Development Plan Document Appendix A	September 2023

DRAFT
Employment
Development Plan Document
(Employment DPD)

Scope, Issues and Options



North Warwickshire
Borough Council

September 2023

1 Introduction

What is Development Plan Document?

- 1.1 A development plan document is a planning policy document which in part will replace or supplement the policies in the adopted North Warwickshire Local Plan 2021.
- 1.2 The purpose of this paper is to set out the scope of the paper and the issues that may need to be addressed through an Employment Development Plan Document (DPD). Where possible options for the way forward are discussed. The paper identifies a range of issues which are briefly set out with questions shown in yellow boxes. These are not exhaustive and other options may be brought forward as part of the consultation process.

2 Background

National Guidance

- 2.1 The National Planning Policy Framework (NPPF) provides the overarching national planning policies. Any local planning policies must be in accordance with the NPPF and follow the planning policy guidance unless there is evidence to indicate that locally a different course of action should be taken. This is a high bar to pass and so the evidence must be relevant, robust and up to date.
- 2.2 The NPPF sees that planning has three overarching objectives of economic, social and environment. The economic objective states:
“a) 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.”
Chapter 6 of the NPPF then seeks to build a strong, competitive economy.

Emerging National Policy / Guidance

- 2.3 It is recognised that there will be changes to the NPPF following the enactment of the Levelling Up and Regeneration Bill (LURB), expected during 2023. To use the current system of producing planning policy documents this document must be submitted to the Secretary of State by June 2025 through the current suggested transitional arrangements. Therefore, this paper will start preparation using the current system and, if required, move to the new system as more guidance emerges.

North Warwickshire Local Plan (Adopted 2021)

- 2.4 The Development Plan for an area, which includes the adopted North Warwickshire Local Plan, should be read as a whole. There are broad policies from the Local Plan which impact on development generally so are relevant when looking at the issues

around employment such as policies LP1 Sustainable Development, LP2 Settlement Hierarchy, LP3 Green Belt, LP4 Strategic Gap and LP5 Amount of Development. There are also specific employment related policies in Chapter 9 of LP11 Economic Regeneration, LP12 Employment Areas and LP13 Rural Employment. These policies are attached as Appendix A.¹

2.5 The full Local Plan can be found at: web address:
https://www.northwarks.gov.uk/info/20002/planning/1082/what_is_the_local_plan_for_north_warwickshire

It is anticipated that this DPD will review and amend if required the following policies: Chapter 9, Employment policies including LP11 Economic Regeneration, LP12 Employment Areas, LP13 Rural Employment, Chapter 14 Allocations policy LP39 Employment Allocations. It may involve Chapter 11 Services & Facilities policies, LP21 Services and Facilities and elements of Chapter 13 Development Considerations policies in LP34 Parking, LP35 Renewable Energy and Energy Efficiency, LP36 Information and Communication Technologies,

Emerging Economic Development Strategy

2.6 The Borough Council prepared a draft Economic Development Strategy in 2020. This was during the pandemic, so a refresh has been undertaken with the advice provided through the LGA Economic Growth Advisers Programme. This document is part of the evidence base for the production of this paper and can be found at: [web address to be added.](#)

2.7 *Objectives and priorities*

The Economic Strategy is underpinned by four Priority Themes:

- Supporting business growth and innovation
- Securing a pipeline of talent
- Enabling investment in infrastructure to support a low-carbon, modern and forward-looking economy
- Supporting vibrant town and service centres through quality place-making.

These 4 themes are translated into an Action Plan that sets out a high-level programme for the Borough Council's economic development activities. The four priority themes are noted in the Action plan are as follows;

- Priority Theme 1: Supporting Business Growth & Innovation
- Priority Theme 2: Talent, Employment & Skills
- Priority Theme 3: Development & Connectivity
- Priority 4: Market Towns & Villages

2.8 In terms of most relevance for the Employment DPD, the Strategy notes the Borough Council's role and governance also involves being "A place shaper to promote a positive

¹ Please note there will be policies which may not be specifically referred to in this paper which may impact the decision on a planning application.

planning approach” and the Action Plan programmes within Priority Theme 3: Development & Connectivity, and Priority 4: Market Towns & Villages may have the most direct planning links and relationship with the emerging Employment DPD. Comments are also being sought on the Economic Development Strategy. (It is included in this consultation and specific comments can be made on that document using the separate response form [LINK TO FORM TO BE ADDED](#))

Question 1:

Is there anything from the Economic Development Strategy which needs to be reflected in the Employment DPD?

3 Scope of the DPD

- 3.1 The original intention for the DPD when first put into the Local Development Scheme, was to focus on the issue of Strategic Employment Land (policy LP6 from the NWLP). However, should the DPD look at all employment related policies from the Local Plan? Attached as Appendix A are the employment related policies from the adopted Local Plan. One reason for doing this would be to pick up new or updated issues, not covered by policies from the adopted Local Plan.
- 3.2 In light of the Government’s policies and proposals for decarbonising all sectors of the UK economy to meet the net zero strategy target by 2050 (Build back Greener - October 2021), this DPD will also consider areas where it could contribute towards addressing that target, raising issues and seeking options to help address and reduce carbon emissions. This will be a theme/hook through much of the DPD.

Question 2:

Are there other policies from the adopted Local Plan that the Employment DPD should seek to review and/or amend? Such as LP5 Amount of Development or transport policies such as LP23 Transport Assessments or renewable energy and ‘Information and Communication Technologies’ policy (in so far as the impact/affect employment proposals) , as well as the employment related policies in Chapter 9 of the Local Plan?

Question 3:

Should this DPD be limited to strategic employment land?

If not, what are the other issues the DPD should consider?

4 Plan period for the Employment DPD

- 4.1 The NWLP has a plan period from 2019 to 2033 with the expectation that his DPD will be a standalone policy document. The Local Plan looks forward to 2033 and continues the theme of sustainable development in the right place with the right infrastructure. The Local Plan also gives an indication of where and how development will take place beyond this time frame in order to ensure a continuous supply of land. It explains how

much and what type of development there will be and where this will be located. The Borough Council recognises that the pressure for growth will extend beyond 2033 and that this needs to be considered at an early stage.

- 4.2 The timescale covered by a Local Plan is referred to as the plan period. National planning policy requires that we look ahead a minimum of 15 years from the date the Local Plan is finalised. It is expected a DPD will take a minimum of 24 months or more to reach Adoption so if finalised by the end of 2025 would require a minimum time period of 2040. This however leaves little room for manoeuvre or flexibility and is likely to be impacted by future planning system changes, so a longer time-period is likely to be more appropriate. A 20 year horizon may be more appropriate to accommodate growth, or application of the time period covered by the HEDNA data, up to 2041 or 2050. It should also be noted that many major infrastructure providers for energy, water and transport are looking at future development growth and needs programmes for infrastructure up to 2050 or further.

Question 4:

What should the plan period be for the DPD? (See options below)

Options:

- 5.1 15 years from adoption of the DPD (assuming adoption during 2025 this would be 2040)
- 5.2 A 20 year period to accommodate growth (this would likely be around 2045)
- 5.3 2041 (to mirror data from HEDNA)
- 5.4 2050 (to mirror data from HEDNA)

5 Settlement Hierarchy

- 5.1 The adopted Local Plan has a clear settlement hierarchy as outlined in NWLP Policy LP2. If the Employment DPD were to allocate land one of the issues to be considered is whether sites should fit within the existing settlement hierarchy. This would be the simplest route as it would mean that LP2 would not need to be updated. It is currently unclear if there would be sufficient opportunities to provide the sites required to fit with the current settlement hierarchy so a call for sites is being made alongside this consultation.
- 5.2 Part of the process for the adopted Local Plan was to review the Green Belt. Some small sites as well as 20 hectares of additional employment land at Hams Hall, were released from the Green Belt. If the current settlement hierarchy cannot deliver the required employment sites should sites within the Green Belt be considered?

Question 5:

Can employment land continue to fit in with the current development strategy of the adopted Local Plan? If not, what other options should be considered?

Question 6:

Should sites in the Green Belt sites be allocated for employment use?

If so, will this require a wider review of the Local Plan?

6 Current Situation

6.1 The first issue to consider is should LP5 be altered or updated in terms of the amount of employment land. The policy requires a minimum of 100 hectares of employment land to be delivered by 2033. The table below shows the total employment land supply between 1.4.2019 and 31.3.2022 which shows that 150.96 hectares have or are being delivered. The detailed site information is supplied in Appendix B.

Table 1: Total Land Supply as at 31st March 2022

	over 0.4 hectares	under 0.4 hectares	Total
<i>Completions Since 2019/20 – 2021/2022</i>			
<i>2019/20</i>	0	0.39	
<i>2020/21</i>	24.25	0.47	
<i>2021/22</i>	42.79	0.25	
<i>Allocations In Local Plan</i>	57.2	0	
<i>Outstanding Sites with Planning Permissions as at 2021/22</i>	25.06	0.81	
Total	149.3	1.92	151.22
<i>Loss of employment land</i>	0	0.26	0.26
Overall Total			150.96

(Source: Table 7 from the AMR 2021/22)

6.2 The HEDNA indicates that the employment land requirement for North Warwickshire is as follows:

Table 2: Employment Land Needs for North Warwickshire (hectares)

Hectares	Office	General Industrial (Class E(g)(iii) and B2)	Sub-Total	Strategic B8 (a proportion of)
2021 - 2041	5.3	56.1	61.4	551*
2021 - 2050	7.0	81.4	88.4	735*

(Source: Extract from Table 2.1 and Table 2.2 of the Coventry and Warwickshire HEDNA Executive Summary November 2022 * Corrected version 29-03-23)

- 6.3 The HEDNA identified needs based on past trends, including a “Labour Demand Model” (where, as forecasts are trend-based, a concentration of forecast jobs growth in warehousing in North Warwickshire is a reflection of historical development patterns although industrial labour demands appear negative), VOA trends (Valuation Office Agency demand data on trends in industrial/commercial stock, indicating North Warwickshire supports over 20% of the Study Area’s industrial market) and Completion Trends (past development trends using completions monitoring). In respect of industrial and warehousing, the HEDNA concludes that neither the VOA or labour demand models are able to differentiate the strategic and more local industrial / warehouse requirements. Both data sets both datasets have caveats and limitations. As a result, the HEDNA suggests that completions data is likely to be the best representation of market needs for the next phase of plan making for industrial / warehousing floorspace particularly for the short/medium-term. The HEDNA also note that *“Some of this need could however potentially be met through recycling of land – particularly where there are plots of over 10 ha in good quality locations which relate well to the strategic road network, have adequate power capacity and are accessible by public transport.”*
- 6.4 In respect of strategic warehousing floorspace (units of over 9,000 sq.m), the HEDNA concludes that it would be appropriate to plan for future development to be in line with recent completions trends over the initial 10-year period (2021-31), with the subsequent decade then seeing potentially slower growth in line with the traffic growth and replacement demand modelling. Nevertheless, the HEDNA notes that the spatial distribution of industrial need has been influenced in part by land availability, highlighting that *“Over the last 20 years, the amount of industrial floorspace grew by 12% across Coventry and Warwickshire. This was particularly driven by a 111% growth in North Warwickshire (influenced by development at Birch Coppice in particular, but also Hams Hall, a legacy from the Regional Spatial Strategy) but large growth of 22% also took place in Rugby.”* Furthermore, The HEDNA notes that *“whilst B8 demand is very strong, there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector. There is a strong manufacturing sector in the sub-region which needs to be provided for.”*
- 6.5 As the supply of strategically large brownfield, former mining/minerals or power generation sites that generated the last 20 years of growth, such as Birch Coppice or Hams Hall, are consumed, questions must be raised over whether the levels of completions within North Warwickshire can realistically (or sustainably) be expected to be maintained? This is re-inforced by the HEDNA which again highlights that *“It would not be appropriate in our view to simply replicate past development patterns in respect of the spatial distribution of development by local authority” (Para 2.17 HEDNA Exec Summary)*. Continuing past completion trends would raise real issues for North Warwickshire in light of lack of available brownfield sites and the natural and Green Belt constraints affecting/applying to much of this rural Borough. Pressure will therefore bear primarily upon greenfield sites, sites within Green Belt, Strategic Gap and/or upon those with other transport related constraints.
- 6.6 The VOA trends for net floorspace changes are high in North Warwickshire, driven by warehousing developments and demand. These are more pronounced in recent years

influenced by strong demand for both manufacturing and warehousing/ logistics space across the country. Recent research² for South East Midlands LEP indicated potential need for up to double the existing warehousing space over the next 20 years, even after taking into account for recycling of some existing stock. The research also noted areas such as the Midlands, that host major motorway routes, are likely to see ongoing significant demand for spaces.

- 6.7 The labour demand model produces a much narrower range and suggests that forecast industrial losses are outweighed by gains in warehousing needs in all areas although these may be overly influenced by national trends in manufacturing rather than being by actual floorspace requirements for industry.

Question 7:

7a Should the HEDNA be the basis of an employment land requirement for the Employment DPD? Yes/No?

7b If so, should past trends be the sole determinant for future employment? Or what other information should the DPD take account of?

7 Additional Employment Land

- 7.1 Since the 2015 Strategic Employment Sites Study prepared by PBA and JLL a further study was commissioned in 2021. This was commissioned by Staffordshire County Council and the Black Country, Coventry and Warwickshire and Greater Birmingham and Solihull LEP's and was prepared by Avison Young / Arcadis. The second study was seen by those who commissioned the work as the Phase 2 work envisaged in the initial study. However, there were many shortcomings with the work and a further study has recently been commissioned by 25 organisations across the West Midlands, including North Warwickshire BC. This is known as the West Midlands Strategic Employment Sites Study (WMSESS). The required study outputs include looking at the current supply situation; assessment of need; addressing modern industry's requirements; confirming the overall quantum and type of sites required; criteria for identifying sites; identify priority areas for additional provision; stakeholder engagement; and provide additional policy advice.
- 7.2 The 2015 study determined an Area A and Area B for sites that could deliver the need originally envisaged as shown in Figure 4.11 from the 2015 Report and listed in Table 4.7, both are reproduced in Appendix C. For North Warwickshire there were 3 sites: Birch Coppice, St Modwens to south-east of Junction 10 M42 and Hams Hall. All 3 sites have been delivered.
- 7.3 As part of the Local Plan examination no amount of additional employment land, beyond that being allocated, for large users could be determine or ascertained. Therefore, the Inspector identified a need to have a policy which allowed strategic employment sites to

² Warehousing and Logistics in the South East Midlands September 2022 ICENI <https://www.semlep.com/warehousing-and-logistics/>

come forward in the absence of any indication of the amount of land that should be allocated. NWLP Policy LP6 (Appendix A) talks about significant weight being given to proposals supporting economic growth and productivity where evidence demonstrates an immediate need.

Question 8

- 8a. *What does “immediate” need mean in LP6?*
- 8b. *How can it be demonstrated?*
- 8c. *Should there be a time limit for its expected deliver if it has been identified as an immediate need?*
- 8d. *What happens to the site if this need does not materialise?*

Question 9

Should the site threshold be the same as the WMSESS i.e. over 25 hectares? If not, what should the site threshold be for considered as a site falling under the currently adopted Local Plan Policy LP6?

8 Other Employment Land

8.1 In addition to the standard employment type uses and sites, the Borough is also significantly impacted by HS2 and its current construction, involving major areas of employment uses and generating significant employment requirements. In addition to HS2 (which will have an impact over the life of the Plan) there are a number of other significant employment generating proposals/sites that are coming forward either as a result of national and/or regional needs or involve NPPF Para 149 exception compliance development within the Green Belt, for major outdoor recreational and landmark structure visitor facilities all of which are likely to generate reasonably significant levels of employment. These include the following:

Table 3: Planning Applications of Other Employment Land

Reference number	Description and Site Location
PAP/2019/0496	Proposed Wave Park Coleshill Manor Campus South Drive, Coleshill
PAP/2019/0701	The erection and operation of a landmark structure, with associated visitor centre and public open space (D2) Land Adjacent to Coleshill Manor Off South Drive, Coleshill

8.2 As part of looking at employment generally it is important to understand if the DPD should look at other employment generating uses and if a specific policy or land allocations are required. What are these uses and how much land, if any, is specifically required for their needs.

Question 10

- 10a. *What other uses should the Borough Council plan for?*
- 10b. *What size of site are required?*
- 10c. *Should a criteria-based policy be developed?*

10d. *If so, what criteria should this include?*

9 Lorry Parking

National situation

- 9.1 The National planning policy framework (NPPF 2021) sets out that local planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.
- 9.2 In addition, the government's policy indicates that development proposals for new or expanded goods distribution centres should make provision for sufficient lorry parking to cater for their anticipated use. In preparing local plans and deciding planning applications, the specific locational requirements of different industrial sectors should be recognised and addressed.
- 9.3 The DoT has also indicated they are updating the 2017 National Lorry Parking Survey to ensure strong evidence is available on the national picture in future. Nevertheless, as part of the A5 Partnership, the Borough Council is aware of this issue along the A5, from layby parking and associated litter/health impacts and the limited facilities available along that major through route, as well as elsewhere in the Borough.

Local situation

- 9.4 A 2011 lorry parking study noted that within the West Midlands, overall lorry parking sites were well used, operating at 71%, some around Solihull operating at 100% utilisation and North Warwickshire between 71 and 100%. Nationally this was the second busiest on-site utilisation for a region.
- 9.5 Although Tamworth and North Warwickshire Boroughs were indicated as having some lorry parking capacity, it is noted that many adjoining local authorities urban areas had limited or **no** capacity including Nuneaton and Bedworth, Coventry and Lichfield District. Whereas Rugby provided the largest number of spaces locally. (Some recent improvements to availability of facilities in Nuneaton and other areas have been noted in online survey TruckFly app by Michelin – 2023, but charges remain an issue).
- 9.6 Capacity at nearby motorway service stations (MSA's) at the M6 Corley Services, has recently been increased by an additional 83 HGV spaces following appeal in 2018 and a new MSA at Junction 1, M6 (Rugby) is now completed. Some future improvements in supply and parking capacity are also expected once the approved 'Catherine-de-Barnes option' service station on the M42, accessed via a new junction 5a, granted outline planning permission at Inquiry on 11 March 2022, is implemented. Work on the new junction is currently underway. However, much of this increase in capacity is likely to be serving through motorway traffic and not serving local needs and impacts.

- 9.7 In terms of HGV Parking requirements at MSA's DfT Update to Circular 02/2013 provides a calculation of 0.5% of HGV's Traffic flow (Vehicles per day), or 1% of HGV's in areas where there is an identified need to be met. This requirement drove the recent applications for parking expansion at Corley MSA.
- 9.8 In terms of overall current available HGV parking spaces in MSA's within a reasonable distance of North Warwickshire, the following are approximately available;
- Corley MSA (M6 J3) – 147 HGV spaces (includes 4 available spaces in the long load bay and the recent 83 granted at Appeal)
 - Rugby MSA (M6 J1) – 60 spaces
 - Tamworth MSA (M42 J10) – approx. 65 spaces (plus additional spaces approved in late 2020 to create capacity for up to 94 spaces),
- 9.9 The National Survey of Lorry Parking 2017 audited HGV parking capacity and availability and HGV parking space availability in the West Midlands was indicated as having critical utilisation of over 85%, Specifically for nearby MSA's, Corley was at 119% and Tamworth at 92% (note Rugby had not been completed and audited at that time). Over 100% levels were indicated by the number of lorries counted parked outside of the designated parking spots, on kerbs and on car parking areas, when there were no available spaces.

Location of, and facilities on, sites for lorry parking.

- 9.10 Another issue relating to the lorry parking relates to availability of associated services and facilities, not just the parking. Welfare facilities and services are an integral provision for main lorry parking sites in many cases and for new sites a minimum of managed toilet and cleaning facilities and/or kitchen facilities, should be considered/made available for ancillary parking provision (whether on-site or integral with the existing business on site that drivers have access to these facilities). This would help alleviate pressure on public parking provision, such as laybys along main routes and address hygiene and littering issues for routes and areas where such services and facilities are limited or non-existent.
- 9.11 This may be considered for specific operators/businesses above an identified threshold (size/area/no's of parking spaces and type of commercial operation on site?) or could be applied as an across the board requirement for all proposals involving and needing an element of on-site and delivery/overnight parking. This approach may also help address affordability of provision, with on-site facilities (even if limited in nature) removing the need for drivers to seek facilities and services off-site following deliveries, particularly where time related chronograph issues reduce the ability and distance drivers can travel to main lorry parking sites/facilities,
- 9.12 Potential sites may be identified as part of the "Call for Sites" process, and/or along with or as part of an employment site? (This will be included in the forthcoming call for Sites exercise).

- 9.13 To address this particular issue there are a number of possible questions and options that can be considered.

Question 11

Should all employment sites include an element of lorry parking? Y/N?

Question 12

3. *Only require sites within future employment sites over a size threshold? Please indicate what should that threshold be, 10, 20, 25 ha's or strategic sites of 50 or more only? Please explain reasons.*

Question 13

Should there be stand alone lorry parking provision (not necessarily directly related to employment sites/estates or operators/businesses? Y/N? If so, where and what facilities should they provide?

10 Farm Diversification

- 10.1 Part of Policy LP13 dealing with Rural Employment in the North Warwickshire Local Plan deals with farm diversification. It states:

LP13 Rural Employment

Farm Diversification

Proposals for farm diversification through the introduction of new uses onto established farm holdings will be supported where it can be demonstrated that:

- a) the development in terms of its scale, nature, location and layout would contribute towards sustaining the long-term operation and viability of the farm holding;
- b) it would not cause an unacceptable adverse impact to the safe and free movement of pedestrian, vehicular or other traffic on the trunk or rural road network as a result of heavy vehicle usage,
- c) there would be no adverse impacts arising from increased noise or other form of pollution,
- d) there are adequate foul drainage facilities, and
- e) there would be no adverse impact on the character of the surrounding natural or historic environment.

- 10.2 There is limited recent planning application evidence available indicating that increased farm diversification proposals for employment generating uses have been forthcoming. The changes over recent years to both permitted development rights and National Planning Policy and Guidance has, however, encouraged and enabled farms, through prior notifications to redevelopment of agricultural buildings/complexes for up to 5

dwellings, or their individual conversion and change of use where they are traditional in style and design. Further relaxation and flexibility is proposed in 2023 to extend permitted development rights that may intensify and increase this trend.

- 10.3 There may therefore be a major change to and impact on the character of farms and businesses in the countryside, with greater focus on, and opportunities for redevelopment for housing. Should this approach be resisted and if so how? In light of proposed changes to GPDO rights and relaxing prior notification requirements the level of control (through impact assessment and detailed consideration of planning applications) will significantly reduce and future control to prevent the loss or redevelopment of a new rural employment site may need to be through either application of an Article IV designation on such sites, effectively removing the sites Permitted Development Rights.
- 10.4 Current existing employment estates are identified within the Local Plan policy LP12 Employment Areas, to which constraints on redevelopment and changes of use outside of employment uses is applied (within and between classes E, B2 general industrial and B8 warehouse and distribution Use Classes only). Is this an approach that could or should be considered for rural areas and large farm complexes and rural businesses, that would need to be identified, to maintain and protect rural employment opportunities? This may increase as an issue in light of proposed relaxation of and changes to General Permitted Development Orders (GPDO) legislation, national policy and guidance.

Question 14

Should this DPD have policies relating to farm diversification and loss of agricultural buildings, modern or traditional? If so what should the policy cover?

Question 15

Should this DPD have policies for the retention and prevention of loss through redevelopment, of major rural businesses and farm/agricultural complexes, similar to policy LP12 on existing employment areas/estates?

- 10.5 As part of farm diversification opportunities and the pressure to reduce Carbon emissions through renewable energy proposals there has been an increase in applications for large sites being brought forward for energy generation or battery storage, in particular, solar farms within and around the Borough. This is particularly evident in the SE sector of the Borough, as this area can link to the national grid within the next 15 years, via a direct underground cable connection as part of the proposals recently granted planning consent.
- 10.6 Although the need to address climate change is important, there are concerns over potential impacts such large-scale loss of productive agricultural land uses may have in terms of food supply and production. There are circumstances where appropriate solar panel design enables some continued agricultural uses beneath the solar panels, but this would not apply to battery storage proposals. There are nevertheless concerns over the loss of “best and most versatile land” to such alternative sustainable energy uses and this may be an issue the Employment DPD needs to consider for a rural Borough

such as North Warwickshire. The term 'best and most versatile land' refers to: 'Land defined as grade 1, 2 or 3a of the Agricultural Land Classification. This land is considered the most flexible, productive and efficient and is most capable of delivering crops for food and non-food uses.

Question 16

Should this DPD have policies relating to solar farms, battery storage and wind turbines? If so what criteria should they include? E.g. Relating to design, location, visual impact and land quality?

Question 17

Should this DPD have specific policies relating to, or seeking avoidance of loss of Grade 1 or 2 agricultural land and directing such sites towards Grade 3 or less? Yes or No, please explain?

11 Affordable Employment Land / Buildings

- 11.1 The Local Plan is clear that it is essential to maintain a balance between housing and employment provision. This can often be challenging because residential values in the Borough exceed most forms of employment use and, (anecdotally), there is often pressure from developers to release employment land for housing use.
- 11.2 In addition, the relaxation of permitted development rights and the focus on brownfield pdl (previously developed land) opportunities for redevelopment has also reduced availability of employment land supply and increased land values (through increased competition for higher value uses) thereby impacting on affordability of land, particularly for small to medium businesses and startup firms. This applies in both urban and rural situations within the Borough.
- 11.3 Similarly, the difficulties in providing rural affordable housing availability highlighted in the 2019 Parliamentary Report 'Time for a strategy for the rural economy' are also noted for rural businesses and employment, where "a related challenge is the availability and affordability of rural working spaces, particularly for smaller businesses."
- 11.4 The Coventry & Warwickshire Sub Regional Employment Market Signals Study, in July 2019 noted that 'High take-up levels (of employment/commercial space) have led to increases in rents across the Coventry and Warwickshire sub-region'. The Study notes that the Chambers of Commerce in Coventry and Warwickshire and the FSB have suggested that more generally there is a shortage of suitable premises for smaller and new-start businesses, particularly in respect of small workshops. There is also a real issue of "affordability", with a shortage of available premises across the size spectrum, at low rents.
- 11.5 To try and address this issue new employment land allocations and provision should consider including space for small to medium business units, or small startup and

“incubator” units to provide opportunities for new businesses and commercial enterprises to establish, grow and contribute to broadening the employment supply and character across the Borough, but particularly within rural areas. This not only has the benefit of providing a more ‘sustainable’ choice and opportunity for employment but may also help reduce commuting and travel to work distances for the rural population and contribute toward reducing carbon emissions.

- 11.6 Once provided, the concern will also remain around the continued availability and “churn” of small sites, to provide future opportunities for startup businesses. Currently the Adopted Local plan provides an element of protection from redevelopment to the Boroughs identified industrial/employment/business estates such as Birch Coppice, Carlyon Industrial Estate or Holly Lane/Innage Park estate, notwithstanding the current national proposals to relax the General Permitted Development Rights (GPDO) for changes of use and redevelopment of pdl land and employment uses/buildings.
- 11.7 Question 15 of this Draft Employment DPD Scope, Issues and Options document comments on this issue. But the consideration of wider application to small rural employment sites within the Borough may also be an option. If the changes to GPDO rights (including removing the 3 month minimum vacancy requirement for premises immediately prior to the date of the application for prior approval) means this level of control over start-up sites or incubator unit development future availability is prevented (lost) the only real secure opportunity for future control and constraint to the loss or redevelopment of a new rural employment site would be through either application of an Article IV designation to such sites, effectively removing the sites Permitted Development Rights, or through compulsory purchase of the site by the Borough Council, to ensure greater control over redevelopment, rental levels and availability.
- 11.8 The use of planning controls, through application of planning conditions to planning consents on a site, is an alternative approach. However, this would have limited weight and power in light of both the relaxations being made to permitted development rights subsequently applying to the site or buildings and to the ability of future planning applications to be submitted for changes to/alteration and removal of planning conditions, which again, would be expected to reflect and respond to changes in permitted development rights resulting in the loss of the site/facility and use.

Question 18

Should new (major or strategic?) employment site allocation policies/proposals include an area/element specifically for small to medium units ? Y/N

Question 19

19a. Should the Borough seek to provide and identify sites for start-up incubator units available at an affordable rent level (similar to the approach for affordable housing provision)?

19b. If so, should such provision be across the Borough or focussed on rural areas and settlements? Please provide explanation reasons?

19c. Should sites specifically for small start-up incubator units be supported by policies for their retention and prevention of loss through redevelopment? Y/N?
19d. Would you support this approach if it required either application of Article IV designations or pressure to Compulsory Purchase sites to ensure control over future development and GPDO 'Permitted Development' rights changes? Y/N Please explain answer.

12 Climate Change and Net Zero

- 12.1 The Borough Council declared a Climate Change emergency in October 2020 and has prepared an Action Plan which outlines some of the actions the Borough Council will take. The Local Plan has some policies which seek to ensure that buildings are built well and can generate renewable energy. Increasingly Building Regulations require buildings to be built to certain standards. Planning policy should therefore not duplicate what is already being requested through that route. However, information on climate change and progress to net zero is moving at a pace. Is the Local Plan therefore the best place to encourage further implementation towards net zero?
- 12.2 Many of the “big sheds” are only built with a relatively short live span of between 20 to 30 years. Although this means that there is flexibility as the needs of the occupier changes it also means that to replace buildings it can have a major impact on resources.
- 12.3 The supply of employment/warehousing land can also be partly addressed through the re-use and redevelopment, or “churn” of existing sites. Encouraging this approach will help contribute towards supply of sites while minimising the physical land take and reducing visual impacts from new greenfield development. The need to be flexible and accommodating the wholesale redevelopment of sites for new users and uses, however, also needs to be balanced against the consumption of, and impact on resources and Climate Change. Where change of use with minimal demolition and redevelopment of a site and buildings can be achieved, reducing materials and energy consumption, this should be encouraged/enabled,
- 12.4 The need to ensure the recycling of any waste generated by redevelopment, including construction, demolition and excavation waste such as brick, stone, concrete and asphalt, should also be encouraged and enable them to be re-processed to provide products for the construction industry to re-use. The Waste Local Plan (the Warwickshire Waste Core Strategy 2013), encourages such approaches and uses, by supporting Secondary and Recycled Aggregate production to a standard whereby it can be re-used in new construction projects, so it ensures that less primary aggregate is required, maximising reuse and recycling of the County’s waste and reducing the amount that is disposed to landfill. However the Waste Local Plan is out of date in relation to Climate Change in any significant detail , in respect of national policies and requirements, so this issue is being raised as to whether North Warwickshire cover and include this issue in this DPD to help address climate change? This approach could also be applied to existing site redevelopment proposals, through a criteria-based policy including a series of steps and questions as follows;

- Avoid demolition if possible (Why can't the building be re-used?),
- Mitigate if not possible through re-use of materials ,
- If can't re-use then show how materials will/could be recycled (where possible),
- Design of new should have a longer life design built in.

Applying this approach may address a gap in policy where requiring a sequential approach to re-use and recycling will help address Climate Change targets (in addition to the reduction in waste and efficient use of resources aims). However, it will need to be considered whether the responsibility and application of such a policy lies within the remit of this DPD or a County function as part of a revised Waste Plan?

Question 20

20a. *Do we use the policies from the adopted Local Plan, LP35 Renewable Energy and Energy Efficiency, to try and progress to net zero?*

20b. *Do the policies go far enough?*

20c. *Or are building regulations the better way to secure net zero buildings / sites?*

Question 21

21a. *Should there be specific policies referring to net zero buildings or should this be dealt with through Supplementary Planning Documents? Y/N?*

21b. *If so, what should these policies and/or SPD's include?*

Question 22

22a *Should there be greater flexibility and encouragement for changes of use and redevelopment of existing sites, to help address demands?*

22b *How would this be applied?*

Question 23

23a. *Should there be simple policy support and encouragement for re-use of demolition and waste material Y/N*

23b *or a policy 'requirement' for programmes/schedules indicating re-use of demolition and waste materials from redevelopment sites/proposals, applying a "sequential test" criteria approach to site redevelopment? .*

23c. *Is this policy approach within the remit of an Employment DPD? Y/N*

13 Design of Employment Sites

- 13.1 The physical and visual impact of new large scale industrial and warehousing buildings can be significant in both landscape terms in a rural borough and in residential amenity terms through oppressive, overshadowing and overlooking of adjoining uses and residential areas. The Borough Council is therefore considering producing supplementary planning design guidance either as part of the Draft Design Code work for the Borough or as a stand-alone draft Design Code or SPD specifically for major employment and

logistics buildings/estates, large strategic sites and for sites in open rural areas and/or close to residential areas.

- 13.2 Prior to this issue being addressed through a Draft Borough Design Code or SPD, should this Employment DPD consider addressing the issue through a criteria-based design policy, covering setting, colour, signage, height and floor levels for instance?. As discussed in sections 10 and 12 and Question 21 above, the issues of climate changes and carbon reduction could also be addressed through policy or as part of a draft Design Code or SPD, seeking a move towards zero carbon designs.

Lighting

- 13.3 The lighting of sites, especially ones which are built in previously unlit areas, need to be carefully considered. Light pollution and glow into the sky is an issue, as well as on-site security, and needs to be addressed as part of developments. It is proposed to update the Lighting SPD which was adopted by the Borough Council in 2003 and work is currently underway. Current Local Plan Policy LP29 ‘Development Considerations’ and LP30 “Built Form” include reference to lighting design and reduce sky glow, glare and light trespass. Nevertheless, lighting could also be included as part of a design criteria-based policy, specifically relating to the impact from employment developments. Informal guidance from CPRE in 2016 notes the need for authorities to develop policies to control light pollution in local plans for rural locations and that areas that benefit from existing “dark skies” and tranquil areas are protected.³
- 13.4 The issue of “Tranquillity” as addressed in Natural England/CPRE publications is a major one for some locations in the Borough being targeted by Logistics pressure or transport infrastructure and major sub-regional visitor proposals (such as “The Prayer Wall” and “Surf Centre”) with cumulative impacts along the Coleshill Corridor and M42 Corridor. The main motorway junctions may already be impacted by noise but the added built form in scale and size and lighting from new development will have an even greater impact on Tranquillity and rural character that should be addressed.

Question 24

24a. Should building design be addressed in the short term through a criteria based policy in the employment DPD or left to a Design Code or SPD for the Borough ?Y/N
24b. If so, should the policy also address Climate change and Zero Carbon design issues as well?

Question 25

Is it sufficient to rely on the adopted policies in the Local Plan 2021, as they refer to lighting, and updating the Lighting Supplementary Planning Document (SPD) sufficient to control lighting on employment sites?

³ Source: CPRE 2016 Night Blight: Mapping England’s light pollution and dark skies

● should develop policies to control light pollution in local plans which will ensure that existing dark skies are protected, and that new developments do not increase local light pollution. CPRE maps can be used as evidence to inform decisions on local planning applications.

14 Other Local Plan policies

- 14.1 The current Local Plan includes Policy LP12 protection for existing current employment estates and new employment sites/uses in the rural areas by policy LP11 Economic Regeneration. With growth over time some of these estates have increased in area and also some large employment sites within the Borough not covered by LP12 areas but potentially covered by LP11, have also grown. Should these growth areas (including smaller rural estates covered by LP11) could benefit from an LP12 type Policy protection, being specifically designated and shown on a proposals map? This may help address some emerging concerns over increased flexibility in allowing redevelopment for non employment uses, proposed in forthcoming changes to General Permitted Development Orders (GPDO) legislation, national policy and guidance. As these changes involve relaxation and broadening of GPDO permitted development rules there would likely be the necessity to consider applying Article IV restrictions locally, removing those specific GPDO rights.⁴

Question 26

In light of recent changes to GPDO permitting changes of use to employment and commercial development (Class B1, B2, B8 and Class E) without requiring planning consent (or subject only to 'Prior Notices) is there benefit in applying employment designations to areas/estates that have no or limited control, and, subsequently applying Article IV designations to those designated areas.?

Question 27

Should we apply employment change of use restriction designations for smaller rural employment estates in light of the GPDO changes? Yes or No, please explain reasons?

If Yes, what size of sites and what distances/location from settlements should be considered appropriate before application of such restrictions?

15 Call for sites

- 15.1 A call for sites will be carried out alongside the consultation on this paper. It is proposed the call for sites is for all developments and not just those being promoted for employment use. This is to ensure that sites which may be thought suitable for one particular use are considered for other uses. This will ensure we will be aware of all potential sites and so can be assessed at the earliest opportunity.
- 15.2 The Coventry and Warwickshire Housing and Economic Land Availability Assessment (HELAA) Methodology (February 2022) will be used by the Borough Council to assist

⁴ See - Article 3(4) of the GPDO 2015 provides that permitted development (PD) rights will not apply if they are 'contrary to any condition imposed by any planning permission granted or deemed to be granted under Part 3 of the [TCPA 1990] otherwise than by this Order.

with the initial sifting of sites. The methodology has been agreed across the Coventry and Warwickshire area.

Question 28

Are there any local issues that should be considered in addition to those outlined in the HELAA at this initial stage?

16 Sustainability Appraisal

16.1 A sustainability appraisal (SA) is required to accompany the development of planning policies. . Although the current system is being changed a SA Scoping Report using current guidance has been prepared and is being consulted at the same time as the consultation on this document. The Levelling Up and Regeneration Bill launched a new form of environmental assessment known as Environmental Outcome Reports (EOR). The intention is that Environmental Outcome Reports will replace the existing system of Sustainability Appraisals (SA), Strategic Environmental Assessments (SEA) and Environmental Impact Assessments (EIA). Further guidance is awaited. In the meantime, the Borough Council has refreshed the scope of the SA/SEA and is the subject of a separate consultation.

Provide link to the consultation and to the form for response here.

17 Evidence base

17.1 A planning policy document must be based on evidence that is proportionate to the subject being considered. Alongside consultation on this Employment DPD the Borough Council will be carrying out a 'Call for Sites' and producing an Economic Development Strategy as part of that evidence. To date the evidence to be used in the production of this DPD will include the following documents and forms of information:

Table 4: Evidence

HEDNA (Housing and Economic Development Needs Assessment for the Coventry and Warwickshire area).	November 2022
Strategic Employment Sites Report – currently being delivered	Due Autumn/Winter 2023
A Call for Sites	Winter 2023
North Warwickshire Economic Development Strategy – refreshed document	Spring 2023

Question 29:

What other evidence is required to move forward with an Employment DPD?

**Policies relating to
Employment from the adopted North Warwickshire Local Plan 2021**

LP1

Chapter 6 Sustainable Development

- 6.1 When considering development proposals that accord with policies in the Local Plan, the National Planning Policy Framework is also a material consideration. As delivery of the Local Plan is very important to the Council it will take a positive approach that reflects the presumption in favour of sustainable development. The Borough Council will always work proactively with applicants and other stakeholders jointly to seek solutions which mean that proposals can be approved wherever possible, and to secure development which sustainably improves the economic, social and environmental conditions in North Warwickshire.
- 6.2 Place making is a key part of considering development proposals and making them sustainable whatever their size. There are two overarching elements that make development proposals work for the long term. These are ensuring the development is of a quality that is long-lasting, and that infrastructure is provided.

Quality of Development / Place

- 6.3 The quality of development is important and can be helped through early consideration of the development. This is particularly the case in considering the natural and historic environment and how this will be dealt with. Considering biodiversity at an early stage of the planning process will assist in building in beneficial features to aid biodiversity.
- 6.4 The Council will work with and look to developers to contribute effectively to maintaining and developing local Quality of Life and assisting in the delivery of the Sustainable Community Strategy, through high standards of development; the type and character of buildings and uses proposed and from measures of the type set out below:
- ensure that the impact of development on the social fabric of communities is considered and taken into account;
 - seek to reduce social inequalities;
 - address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing (particularly affordable housing), education, shops, leisure and community facilities;
 - take into account the needs of all the community, including particular requirements relating to age, sex, ethnic background, religion, disability or income;
 - deliver safe, healthy and attractive places to live; and,
 - support the promotion of health and well-being by making provision for physical activity including walking and cycling.
- 6.5 In addition to delivering suitable forms of development in appropriate locations, a main objective of the Core Strategy was to promote high quality development at all times. This continues in this Local Plan and policies in this Plan are formulated with this objective in mind. Quality developments rely on a combination of factors including aesthetics of the buildings; how water is dealt with and how development fits within the landscape, both rural and urban. Other policies play an equal part in the achievement of quality developments such as how access is gained to

a site and how cars and lorries are treated within a scheme. All are crucial in achieving high quality developments within the Borough and making places work.

- 6.6 The Design Council has developed the Building for Life (BfL)¹ standard, in conjunction with the Home Builders Federation and is supported by government as the standard for the design quality on new homes. BfL provides a means of ensuring new housing meet appropriate design standards; respect their setting and are sustainable, thus creating quality places.
- 6.7 The Borough Council will encourage the use of the BfL standard within new residential developments. It will look to promote Building for Life and where appropriate, offer specific guidance drawing on this initiative. Consequently, the aim is to ensure that all new housing developments achieve a good standard of design as defined by the BfL standard and serve the needs of the existing and future residents.
- 6.8 Ensuring high quality design across the commercial and industrial sector is equally as important. Many elements of the BfL standard apply to non-domestic buildings and the Council will seek that development achieves a good standard.
- 6.9 The Council recognises the importance of planning development to reduce the opportunity for crime, including terrorism. Whilst crime levels across the Borough are generally lower than other areas of the West Midlands, design should ensure such figures are maintained and further lowered where possible. The fear of crime especially at night is still an issue. The Borough Council will use the Secured by Design² principles, which are widely accepted to contribute to lowering crime rates.
- 6.10 North Warwickshire is made up of a number of communities and thus there are very differing styles. With the Borough having over 50 settlements it is important that the local distinctiveness is reflected in any developments. This is particularly important in settlements that for the settlement hierarchy have a co-joined settlement boundary. This does not detract from the fact that these places consider themselves separate with each having their unique identities.
- 6.11 The Landscape Character Appraisal and individual Settlement Appraisals have been carried out and will be developed further into Supplementary Planning Documents and should be used as the basis for creating locally distinctive proposals. The Landscape Character Assessment identified landscape sensitivity areas surrounding settlements and these will be used when assessing impacts from developments. The Borough Council has Design Champions and they will be used to promote and encourage local distinctiveness in new developments.
- 6.12 Development can adversely affect public rights of ways. Therefore, the Council wants to ensure that public rights of way, where relevant to the development proposed, are protected and enhanced (including via relocation or alternative provision where justified).
- 6.13 Planning applications should be submitted with evidence to show how the design, scale and layout match the historic pattern of the surrounding development, its built form, density and overall appearance.

Implementation and Infrastructure

- 6.14 The delivery of infrastructure at the right time and in the right place will be essential to the success and delivery of developments for this Local Plan. Infrastructure can range from the provision of services and facilities to the provision of the open spaces to the provision of emergency services and waste collection services serving new homes. Considerable

importance is attached to the need to ensure that existing and future local communities in North Warwickshire have reasonable access to a range of services and facilities.

¹ Design Council 2015; Building For Life, <http://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition>

² ACPO CPI, 1989; Secured by Design, www.securedbydesign.com

- 6.15 A number of factors underpin the importance of planning agreements and Section 106 contributions in North Warwickshire:
- The area is relatively remote with a small but dispersed population and this has an impact on the cost of service provision.
 - The Borough Council has a history of working in partnership with developers to secure and deliver local benefits through the Planning process.
 - The area does not benefit from any significant UK, regional nor EU regeneration regimes.
 - There are significant public concerns to ensure the impacts of development are mitigated.
 - Again, there is public concern to maintain the provision of local services that are vital to community life.
 - Limited Council resources reflecting a small and rural population.
- 6.16 In the context of planning for the growth of an area, infrastructure can be defined as physical development needed to support communities and which directly relates to economic development and regeneration. This includes:
- Transport Networks - Pedestrian facilities, roads, public transport, cycle ways;
 - Health Facilities - Hospitals, care provision, GP and dentist surgeries
 - Education - Schools, higher education, research infrastructure;
 - Town and Local Centre improvements - Enhancements to the public realm through providing new facilities and highway improvements;
 - Green Infrastructure - Enhancing and creating networks of open spaces;
 - Leisure Facilities - Open space and built recreation facilities;
 - Protection of Environmental Assets - Mitigating impact from development on internationally and nationally protected habitats and species;
 - Utilities Facilities – Energy / waste / wastewater/ drainage plants, networks and treatment facilities;
 - Flood Prevention - Strategic defences to protect the town and enable growth;
 - Renewable Energy - District heating and renewable energy networks;
 - Communications Infrastructure - Broadband and mobile phone access;
 - Community Facilities - Includes libraries, community halls etc.
 - Emergency services
- 6.17 More details are provided in the Infrastructure Delivery Plan, Supplementary Planning Documents, and the evidence which underpins this Local Plan as indicated in Appendix C of this Local Plan. This information will be updated through the Plan period by the Council and the numerous partners, agencies and organisations.
- 6.18 Contributions towards infrastructure provision will be sought through appropriate use of planning conditions and obligations in accordance with national policy and associated Planning Practice Guidance, and statute
- 6.19 Alongside this Local Plan is an Infrastructure Delivery Plan. This sets out the known infrastructure requirements to accommodate the growth within the Borough. This will be

updated on a regular basis. The Plan will feed into a Community Infrastructure Levy (CIL) which is a new planning charge that came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010 (now amended by the Community Infrastructure Levy (Amendment) Regulations 2011). The Borough Council will work with partners to develop a Community Infrastructure Levy charging schedule as well as seek alternative funding opportunities. Both S106 obligations and CIL will need to have regard to viability issues to ensure the level of levy set or obligations sought does not prevent the delivery of development in general.

- 6.20 The policies give a framework within which assessments of S106, CIL or other legal agreements will be made. These will be supplemented, where necessary, over time by further advice in the form of guidance notes and Supplementary Planning Documents.

Future Growth

- 6.21 The Borough Council recognises that the pressure for growth will extend beyond 2033 and that this needs to be considered at an early stage. It will explore with partners and stakeholders' options for future growth of the Borough beyond 2033 to ensure options are explored and the required infrastructure is provided in a timely manner. This will enable a wide range of options to be explored, ensure infrastructure and the funding of it will be provided accordingly and that places are created that are sustainable.

LP1 Sustainable Development

Planning applications that accord with the policies in this Plan (and where relevant, with other development plan policies including those in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, applications will be determined in accordance with the presumption in favour of sustainable development.

Quality of Development / Place

All development proposals must;

- be supported by the required infrastructure
- be consistent with the approach to place making set out through development management policies, including, where relevant
- integrate appropriately with the natural and historic environment, protecting and enhancing rights of way network where appropriate
- demonstrate a high quality of sustainable design that positively improve the individual settlement's character; appearance and environmental quality of an area;
- deter crime;
- sustain, conserve and enhance the historic environment;
- provide, conserve and enhance biodiversity; and,
- create linkages between green spaces, wildlife sites and corridors.

Development should protect the existing rights of way network and where possible contribute to its expansion and management.

Implementation and Infrastructure

Infrastructure will be sought where it is necessary, directly related to the development and is fairly and reasonably related in scale and kind to the development. It may be related to social, economic and/or environmental issues. Supplementary Planning Guidance and documents will be used to guide provision, Infrastructure requirements are outlined in the Infrastructure Delivery Plan (For clarity, infrastructure projects drawn from the IDP are itemised and indicated to be either critical to the Plan's strategy as a whole, or necessary in association with particular allocations or projects, along with indicative timings are itemised in NWBC26, Appendix A) and the supporting documents contained in Appendix C of the Local Plan. The list is not exhaustive as each will be taken on a site by site basis and will depend on the viability of the scheme. Other site specific measures will be considered at the time of the planning permission. These will be secured through conditions, S106's or other agreements considered appropriate to ensure its delivery. It will be necessary to ensure the ongoing maintenance, where appropriate, of any infrastructure provision.

Where development is proposed in excess of plan requirements and would assist in the provision of or enabling infrastructure, particularly that related to facilitating development in the long term, or of affordable housing relative to needs, that will carry weight in favour of granting permission.

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LP2

Chapter 7 Spatial Strategy

- 7.1 The Local Plan sets out the long term strategic policies and proposals. It identifies a Borough-wide pattern of development and sets out the sites to bring forward the required development.
- 7.2 The Spatial Strategy is a key component of the Local Plan for delivering a sustainable way of living and working and considering the appropriate distribution for development. It seeks to allow development to take place in a controlled pattern throughout the Borough. The pattern of development has been influenced by considering how the Borough functions, as well as the impact of surrounding cities and towns. Future development will take place in accordance to the size of the settlement taken, with its range of services and facilities and is influenced by considering if the settlement is in or outside of the Green Belt. This will mean that the majority of development will take place in the larger settlements, with more limited development in the smaller rural settlements and in particular those not in the Green Belt. This will benefit those who currently live, work and visit the Borough and future generations and ensure that development is directed to the most appropriate place. A constraints map is attached as Appendix N.
- 7.3 The Local Plan's approach is still to steer most development to the Main Towns and then in a cascade approach in other settlements with very little development towards the countryside. A limited amount of development is targeted to the smaller settlements which follow the recommendations of the Matthew Taylor Report which advocated more development in the rural areas, to assist in maintaining the vitality of the rural settlements.
- 7.4 The Matthew Taylor Review on the Rural Economy and Affordable Housing showed that historically, settlements can grow incrementally, and this can help to maintain the balance between restraint and the continuing vitality of the settlements. In the Core Strategy this approach was widened to consider the holistic development of services and facilities to help maintain and enhance thriving communities. The constant aim is to provide these in the most sustainable way, without it stimulating pressure on the countryside, in particular, the Green Belt to make suitable provision for development necessary to sustain rural communities, by focussing rural housing development and supporting facilities on a network of Local Service Centres, but with limited development provision in other smaller settlements, identified with a development boundary on the Policies Map. Elsewhere, other than where specifically provided for in the Plan, development will be limited to that requisite for agriculture, forestry or other uses that can be shown to require a rural location. This Local Plan carries this forward.
- 7.5 The difficulty arises in determining how much development should be allowed in the smaller settlements, particularly as 60% of North Warwickshire is within the Green Belt. For example, it has been estimated to warrant an additional primary class that over 150 new dwellings would be required. In many locations this is not feasible when trying to balance the needs of the local community, the protection of the local environment, the character of the settlement/landscape and ensuring that the development is as sustainable as possible. To keep a village shop profitable is indeterminable, as changing shopping habits can easily skew this. In some locations a small village can sustain a village shop, whilst in other locations the shop is not profitable. In these instances, however, it is not just seeing shops as shops, but it is the need to protect those premises as a community asset with wider potential.
- 7.6 Atherstone with Mancetter and Polesworth with Dordon, are the Main Towns. Coleshill is also recognised as a Market Town due to its range of services and facilities, but development will

be smaller in scale due to the Green Belt wrapping around the settlement. There are five Local Service Centres located throughout the Borough, which provide important local services and facilities. Housing growth has generally been distributed to the Market Towns (including Coleshill) and then to Local Service Centres. In settlements, villages and hamlets beyond these, development that provides for local housing needs and help support local services will be permitted.

- 7.7 The amount of development now being envisaged means that the Borough Council has had to consider whether it is appropriate or possible that all the required development can fit into this settlement hierarchy. As the hierarchy underpins many of the policies within the Plan it is important to ensure there is flexibility to ensure development is delivered. As a result, it is considered necessary to allow developments that may be on the outer boundary of the Borough that are close to sustainable settlements outside of the Borough such as Tamworth and Nuneaton.
- 7.8 This Local Plan allocates strategic and non-strategic housing sites. Further allocations may come forward through Neighbourhood Development Plans, prepared by Parish Councils. All development proposals from housing, employment and retail will be expected to accord with the settlement hierarchy and be proportionate to the size and scale of the settlement.
- 7.9 Although in the past it was only local affordable housing that could be supported in the smaller settlements, now a small proportion of market housing as well as affordable has been allocated to some of the smaller settlements in order to assist with maintaining the vitality of these smaller communities. So, in smaller settlements small scale housing developments that help regenerate and support the rural economy or meet proven affordable housing needs (via a local housing needs assessments) can still be considered. If plan monitoring shows that this distribution is not being maintained through planning permissions, the position will need to be redressed through a revision to this policy.
- 7.10 In the Core Strategy it was suggested that in Category 4 settlements, sites would normally be no larger than 10 units at any one time. The reason behind this was to ensure small communities were not swamped by new developments but could grow organically and naturally to be sustainable. This is still the case and continues to be the stance of the Council. However, it is clear in the production of this Plan that sites that have been put forward for development are not the smaller incremental sites and tend to be larger. For this reason, there are some allocations that are larger. In these cases the Borough Council will discuss phasing options where viability permits.
- 7.11 Work is continuing at a sub-regional level with neighbouring authorities to develop a Sub-Regional Spatial Strategy. This will build on the work already carried out and will reflect issues arising from the creation of the Coventry & Warwickshire Local Enterprise Partnership (CWLEP). It is not expected that this work will alter the specific Spatial Strategy for North Warwickshire.

LP2 Settlement Hierarchy

Development within the Borough will be proportionately distributed and be of a scale that is in accordance with the Borough's settlement hierarchy. Development will be commensurate with the level, type and quality of day to day service provision currently available and the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development in liaison with service providers.

In Categories 1 to 4 settlements development within development boundaries will be supported in principle. Development directly adjacent to settlement boundaries may also be acceptable, including that which would enhance or maintain the vitality of rural communities, provided such development is proportionate in scale to the relevant settlement and otherwise compliant with the policies in the plan and national planning policy considered as a whole (including in respect of Green Belt protections)

Category 1: Market Towns of Atherstone with Mancetter and Polesworth with Dordon and the Green Belt Market Town of Coleshill

Category 2: *Settlements adjoining the outer boundary of the Borough*

Development will be permitted directly adjacent to built up areas of adjoining settlements if:

- a) the site lies outside of the Green Belt or Strategic Gap
- b) development would integrate clearly with wider development
- c) has a clear separation to an existing North Warwickshire settlement to ensure the character of North Warwickshire settlements are preserved; and,
- d) linkages are made to existing North Warwickshire settlements to ensure connectivity between places especially via walking and cycling

Category 3: Local Service Centres – Baddesley with Grendon, Hartshill with Ansley Common, New & Old Arley, Kingsbury, Water Orton

Category 4: Other Settlements with a development boundary - Ansley, Austrey, Curdworth, Fillongley, Hurley, Newton Regis, Piccadilly, Ridge Lane, Shuttington, Shustoke, Warton, Whitacre Heath, Wood End

Development within development boundaries will be supported in principle. Development directly adjacent to settlement boundaries may also be acceptable. All development will be considered on its merits; having regard to other policies in this plan and will cater for windfall housing developments usually on sites of no more than 10 units at any one time depending on viability, services and infrastructure deliverability

Category 5: *All other locations*

All Development

In all other locations development will not generally be acceptable, albeit as set out above that there may be some instances where development may be appropriately located and would enhance or maintain the vitality of rural communities under this category. Special circumstances should exist to justify new isolated homes in the countryside such as rural workers' needs, the optimal viable use of a heritage asset, the re-use of redundant buildings enhancing its immediate setting, the subdivision of an existing residential dwelling, or development of exceptional quality or innovative design or for rural exception sites in line with national planning policy. All such development will be considered on its merits and with regard to other policies in this plan.

LP5

LP5 Amount of Development

Between 2011 and 2033 the Council will make provision for a minimum of:

- 9598 new dwellings,
- 100 hectares of employment land (subject to policy LP6), and
- 19 permanent residential gypsy and traveller pitches between 2019 and 2033.

The actual amount of development delivered over the Plan period will be governed by the provision of infrastructure to ensure developments are sustainable.

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LP6

- 7.46 Area A encompasses land covered by the Strategic Gap, designated Green Belt, and land which is not in categories 1, 2, 3 or 4 of plan policy LP2. This policy does not automatically override other policies but recognises that there are particular locational requirements specific to certain employment uses and economic benefits to addressing needs in those locations. As such, any weight accorded to proposed employment provision by virtue of this policy will be considered in the context of the policies in the plan as a whole in arriving at a balanced assessment.

LP6 Additional Employment Land

Significant weight will be given in decision taking to supporting economic growth and productivity, particularly where evidence demonstrates an immediate need for employment land, or a certain type of employment land, within Area A on Figure 4.10 of the West Midlands Strategic Employment Sites Study of September 2015 (or successor study) which cannot be met via forecast supply or allocations. The relevant scheme will be required to demonstrate:

- (i) access to the strategic highway network is achievable and appropriate,
- (ii) the site is reasonably accessible by a choice of modes of transport,
- (iii) it is otherwise acceptable, taking account of the living conditions of those nearby.

Employment Requirements

- 7.36 With the abolition of the Regional Spatial Strategy the Borough Council has to consider its employment land target. Looking at the available evidence it has been decided to continue with the target to equate to 11 hectares over a 5 year period. Therefore, over the Plan period this equates to a total of 60 hectares.
- 7.37 The 2013 Employment Land Review (ELR) identified a need for 60 hectares for employment needs and this was reflected in the 2014 Core Strategy. At that time it was understood that 2 hectares of land at Spring Hill Industrial Estate, Arley, would be lost from employment use. The site has however remained in employment use and is now fully used. The continued use of the land for employment purposes reduced the need to find those 2 additional hectares elsewhere.
- 7.38 Consultants have revisited the Employment Land Review providing the evidence to show that there is still a need for 58 hectares (excluding 2 hectares at Spring Hill) of employment land within the Borough. The indications are that this requirement will be sufficient to deal with the minimum growth of 5280 dwellings. Further employment land will be required if further housing growth is possible. If the full 9600 dwellings is delivered around 100 hectares of land will be required between 2011 and 2033.
- 7.39 Unlike during the preparation of the Core Strategy the Borough Council has now been approached to deliver employment land for a neighbouring local authority. Tamworth Borough Council is seeking the Borough to deliver a proportion of 14 hectares in partnership with Lichfield District Council. A site allocation has been identified to satisfy a part of these 14 hectares. Lichfield DC has confirmed that they are looking to provide for the balance of 6.5 hectares in their emerging Local Plan. As any additional housing and employment needs to be considered in balance and Tamworth lies within the Greater Birmingham HMA any proportion delivered will be within the overall employment land requirements and are not additional. This will avoid double counting.
- 7.40 Within the Coventry & Warwickshire HMA consideration has been given to the employment land requirements across the HMA. As a result a Memorandum of Understanding has been agreed on the delivery of additional employment land to address a shortfall in provision from Coventry City Council. There are no additional land requirements that the Borough must consider.
- 7.41 In addition, since the preparation of the Core Strategy two studies⁵ have made it clear that there is a wider than local need for large sites. This provision does not necessarily have to be provided for within North Warwickshire. The Borough Council will continue to work with other local planning authorities to see what opportunities there are around the East and West Midlands to deal with this need. There are large scale sites coming forward in other areas such as Daventry, Market Harborough, North-West Leicestershire and South Staffordshire. It is considered more important for the Borough to focus its attention on widening the employment base and to build on the opportunities that the Horiba MIRA Technology Park can provide and seek the provision of aspirational job opportunities within the Borough.

LP11

Chapter 9 Employment

- 9.1 Economic growth is a key Government goal and Local Enterprise Partnerships have been developed to pursue this. The Borough Council wants to work with the private sector to create long lasting local employment opportunities as well as mitigate any adverse impacts and enhance the rural character of the Borough.
- 9.2 Historically North Warwickshire had a number of large brownfield sites that have been redeveloped. Two of the largest sites are Hams Hall and Birch Coppice, which were seen as regional logistic sites in the abolished Regional Spatial Strategy and benefits from intermodal rail freight facilities. Many of the main settlements have a range of industrial estates.
- 9.3 Although North Warwickshire has seen one of the largest growths in terms of logistics and support facilities in the West Midlands it is still a fragile economy, with a high dependency on a narrow range of sectors and larger employers. The growth of the small to medium sized enterprises, in particular, will continue to be supported. Both appropriate rural diversification and regeneration of existing sites will be part of the long term strategy to address the economic issues that the Borough faces.
- 9.4 There is the Horiba MIRA Technology Park, an Enterprise Zone, south of the A5 primarily aimed at research and development. Plans for the development of UK Central around the HS2 Interchange Station on the south west border of the Borough are also expected to provide higher skilled jobs opportunities. With the development of the latter two sites, this will change the local market and will provide opportunities to diversify the local economy for different types of employment growth. The Borough Council is keen to exploit these opportunities.
- 9.5 In addition, to target the priority issues and needs identified through the Sustainable Community Strategy, it is considered that all employment related development, should support and assist improvements to access to services, health, skills training and education opportunities through appropriate contributions or specific service delivery. The aim is to address the skills and education deficit and improve aspiration, opportunity and choice of employment. Delivery will need to provide a more focused match between available local employment and the existing and aspirational local employee skill base, in order to meet local economic needs and to address the large scale out-commuting pattern that presently exists in the Borough.
- 9.6 The Borough Council will work with neighbouring authorities and relevant Local Enterprise Partnerships to develop and assist companies. In particular research and development and other knowledge-based companies/facilities would be welcomed in order to broaden the range of higher skilled employment generating uses.
- 9.7 The provision of highspeed broadband throughout the Borough will be important to allow businesses to grow, develop and exploit the opportunities coming forward as a result of the MIRA Technology Park.
- 9.8 Delivery of appropriate employment uses and redevelopment within existing employment sites should reflect the need to broaden the employment base and improve employment choice and opportunity. This will assist both in the employment choice and opportunities across the Borough. It is important therefore to protect employment land from alternative uses. However,

the Borough Council recognises that this cannot always be the case. Proposals for a change of use from employment uses to non-employment uses should be supported by evidence to show that the existing buildings and land are not suitable or cannot be viably reused for another employment use. Evidence should include details of the marketing of the site for employment use for at least 12 months.

LP11 Economic Regeneration

The delivery of employment generating uses, including the redevelopment of existing employment sites and farm diversification, should reflect the need to broaden the employment base, improve employment choice and opportunities for local people.

All employment land will be protected unless it can be demonstrated that there is no realistic prospect of the site being used for employment purposes. Evidence would need to demonstrate that:

- The site is no longer commercially viable; and,
- It has been marketed for an appropriate period of time, usually no less than 12 months.

Support and encouragement will be given to established / lawful rural businesses to expand where this has no significant and demonstrable harm in particular on the character of the area.

Proposals for new development and redevelopment of existing employment land outside of development boundaries will be considered against Policy LP1 and LP2 and should seek to retain the rural character, appearance and openness of the countryside (including in respect of policy LP3, Green Belt).

LP12

Employment Areas

- 9.9 There are a number of industrial areas throughout the Borough. Some are purpose built whilst others like Manor Road have grown out of the location of other historical uses. It will be expected that the majority of employment generating uses will be concentrated into these areas.

LP12 Employment Areas

The following existing industrial estates together with the sites allocated in this Plan support the functioning of the Borough and in particular the Market Towns and Local Service Centres:

- Holly Lane, Atherstone
- Carlyon Road, Ratcliffe Road and the Netherwood Estate, Atherstone
- Manor Road, Mancetter
- Coleshill Industrial Estate
- Kingsbury Link
- Collier's Way, Arley
- Kingsbury Road, Curdworth
- Hams Hall, Coleshill
- Birch Coppice, Dordon including Core 42

Within all of these estates as illustrated on the Policies Map, changes of use between the Class E, B2 general industrial and B8 warehouse and distribution Use Classes will be permitted provided there are no negative effects arising that cannot be suitably mitigated. However at Collier's Way, New Arley and at Manor Road, Mancetter B8 uses will not be permitted.

The rail freight terminals at Birch Coppice and Hams Hall are of strategic significance. Development proposals on these two estates will be encouraged to use these terminals. Existing rail sidings on other sites will be safeguarded.

LP13

Rural Employment

- 9.10 The Local Plan seeks to support and encourage small scale rural businesses to develop and to enable their expansion where this does not impact detrimentally on the countryside character in environmental or sustainable terms.

LP13 Rural Employment

Farm Diversification

Proposals for farm diversification through the introduction of new uses onto established farm holdings will be supported where it can be demonstrated that:

- f) the development in terms of its scale, nature, location and layout would contribute towards sustaining the long-term operation and viability of the farm holding;
- g) it would not cause an unacceptable adverse impact to the safe and free movement of pedestrian, vehicular or other traffic on the trunk or rural road network as a result of heavy vehicle usage,
- h) there would be no adverse impacts arising from increased noise or other form of pollution,
- i) there are adequate foul drainage facilities, and
- j) there would be no adverse impact on the character of the surrounding natural or historic environment.

Re-Use of Existing Rural Buildings

Proposals for the re-use and adaptation of existing rural buildings will be supported provided that the following three pre-conditions are all satisfied:

- a) The buildings are readily accessible to the Main Towns and Local Service Centres via a range of modes of transport;
- b) they are of sound and permanent construction, and
- c) are capable of adaptation or re-use without recourse to major or complete re- building, alteration or extension.

If the building is a Listed Building or one that is recognised as a locally important building, then irrespective of the foregoing pre-conditions, the re-use or adaptation of that building will be considered if the proposal is the only reasonable means of securing its retention. The proposal will be considered alongside LP15. Development proposals will have to show an understanding of the historic and/or architectural significance of that building; its relationship to its setting and its sensitivity to change. Appropriate materials should be used along with methods of repair which respect the building's significance. As much of the fabric of the building, as possible, that embodies its character and interest should be retained. The criteria set out in section (a) of this policy will however still apply in these cases.

Provided that the building meets these pre-conditions, the preferred re-use of the building for a rural business or service or one that supports an established rural business. Only where demonstrable adverse impacts would arise or such a use can be evidenced to be unviable, would an alternative use be considered. Tourism uses and locally affordable housing provision may be appropriate in this situation in accordance with Policies LP2, LP3 and LP9.

Extract from AMR 2022/23

LP6 Additional employment land

Indicator/ metrics
Amount of employment land provision delivered by Use Class and by hectare and square metre relative to evidence of immediate unmet need within Area A as defined in the West Midlands Strategic Employment Sites Study (September 2015) or subsequent iteration or similar strategic study.
Target:
Report trend

LP11

Indicator/ metrics
<i>Employment generation and diversification (links with LP12 and LP13)</i>
Target
<i>i. Increased and broadened/ diversified employment provision relative to the objectives in LP11</i>
<i>ii. Existing provision safeguarded unless loss is justified.</i>

Over the last three years (including the pandemic period) there have been a number of significant employment generating applications that have also contributed to the diversification of the Borough's employment base.

There are two significant strategic/regional related leisure facilities that have been approved including the "Wall of prayer" visitor attraction, east of Coleshill and the Surf Centre (training/education and visitor leisure facility)

Both of which, when completed, are likely to generate and broaden local employment, with the Surf Centre facility estimated to create 100 full-time equivalent jobs and attract 250,000 visitors.

The online planning application reference are respectively as follows:-

Prayer Wall Landmark Art Structure and visitor centre – PAP/2019/0701 ,

Surf Centre Birmingham - PAP/209/0496,

LP12 Employment Areas

Indicator/ metric
Target
Existing employment base maintained (links with LP11 and LP13) Report trend
Employment land change by Use Class and by hectare and square metre

Further work is required to extract the information from the planning to monitor this indicator.

LP13 Rural Employment

Indicator/ metrics
<i>Farm and rural business growth and diversification, including number of proposals for re-use of existing buildings (links with LP11 and LP12)</i>
Target
<i>Report trends</i>

The potential for redevelopment of farm buildings and diversification of farm businesses has been encouraged by recent changes to National planning policy and regulations for Prior Approvals under permitted development rights, where existing agricultural buildings can be changed to up to 5 dwellinghouses.

Within the last three monitoring years the following planning consents for agricultural building conversions and/or 'prior approval' redevelopments' to residential have been granted.

Residential:

19/20 – 48 applications approved; 8 sites completed

20/21 – 8 applications approved; 2 sites completed

21/22 – 12 applications approved; 0 sites completed

In terms of similar applications or prior approvals for change of use and conversion or redevelopment to employment of other non-agricultural commercial uses the following numbers have been granted.

Employment:

19/20 NIL

20/21 1 application

21/22 NIL

As can be seen from the figures above, there is a clear pressure and financial preference to accommodating building conversions, C/U and/or Prior Approval redevelopments for residential and not employment uses. This is understandable given the current housing pressures and needs and in the differing land/property values the two differing types of development will achieve.

There are concerns that the impact of loss of agriculture infrastructure and operations along with limited employment diversification and commercial opportunities for farming businesses could be detrimental. The introduction of residential uses into working agricultural businesses can cause amenity conflicts (noise, fumes/dust etc) between the uses as well as putting pressures of provision of services and infrastructure in rural areas. This is an area and issue that may benefit from further monitoring and assessment, particularly if the benefit of diversification in farming through redevelopment is not leading to uses that either benefit agricultural businesses or results in diversifying and improving rural employment opportunities.

LP34 Parking

Indicator/ metrics	
Adequate vehicle parking provision made relative to accessibility of location, including in respect of lorry parking	
Targets	
i.	Report trends
ii.	No net loss of lorry parking provision without justification.

i. Report trends

Policy LP34 seeks “Electric charging points will be provided as part of all relevant developments ... Rapid charging points will be provided on sites when located in the public realm”. New housing developments will be expected to provide “E” charging facilities as part of their parking provision and currently 52 relevant housing planning consents are conditioned to require Electric charging points and bays to be installed (Consents between 1/04/2019 and 31/03/2022). (Note, where planning proposals already include and provide for ‘e’-charging points as part of the development and design/infrastructure, it is un-necessary to always condition the consent, so more housing developments will have been approved with ‘e’-charging facilities than the 52 identified).

The number of public “E” vehicle charging points is gradually increasing in the Borough. There are currently 8 public charging points now available, 3 of which are located on major leisure facilities so

have limited access and availability, the remaining located on-street or in public car parks, associated with grant funding and partnership between Warwickshire County Council and BP Pulse.

ii. No net loss of lorry parking provision without justification.

It is difficult to ensure that monitoring can pick up all applications where loss of lorry parking can be picked up due to permitted development rights and the ability to change the make-up of sites where there is no direct engineering or building works. Therefore it is proposed to monitor applications for lorry parking. Since 2019 there has been an extension of lorry parking at Corley Services. There are currently two pending planning applications submitted (*Please note that since the AMR was published that one planning has been determined and one is pending*) which include lorry parking with decisions expected in 2023. These are:

1 Land West of Hams Hall Roundabout and south of Marsh Lane, Curdworth

Outline application (PAP/2020/0295) for an overnight truck stop comprising 200 HGV spaces and associated facilities including fuel refuelling station, amenities building, electric vehicle charging points

2 Land on the Northeast of J10 M42 Dordon/A5

Outline planning application (PAP/2021/0663) for development of land within Use Class B2 (general industry), Use Class B8 (storage and distribution) and Use Class E(g)(iii) (light industrial), and ancillary infrastructure and associated works, development of overnight lorry parking facility and ancillary infrastructure and associated works. Details of access submitted for approval in full, all other matters reserved.

*Employment Development Plan Document
Draft for Consultation
September 2023*

Appendix C

LP5

Employment Land Supply from 1st April 2019 to 31 March 2022

2019/20

Completions of sites over 0.4 hectares

None

Outstanding on sites over 0.4

Site		Planning application number	Status	Size	Use class
Coleshill Hall Hospital	Coleshill	PCOLXX/1274/99/FAP	UC	16.38	B1/2/8
Dosthill	Dosthill	PAP/2013/0298	UC	6.76	B1/B2/B8
Core 42	Dordon	PAP/2017/0014	UC	17.42	B1, B2 & B8
Land north east of the Beanstalk - Plot 7	Dordon	PAP/2015/0679	UC	2.2	B1, B2, B8
SE of Junction 10 M42 (won at appeal)	Dordon	PAP/2018/0149	UC	25.37	B1/2/8
Kingsbury Road	Curdworth	PAP/2017/0521	NS	0.99	A1, Other
Power Station B Site	Hams Hall	PAP/2018/0036	UC	20	B1, B2, B8
Plot 13 Marconi Way	Hams Hall	PAP/2018/0763	NS	1.069	Office
Land south of Rowland Way	Atherstone	PAP/2018/0159	NS	1.92	B1(a), B8
				92.109	

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Completions of sites under 0.4 hectares

Unit 11	Atherstone	PAP/2018/0139	COM	0.39	B1(a), B2
				0.39	

Outstanding of sites under 0.4

Site		Planning application number	Status	Size	Use class
BEC Engineering Ltd	Atherstone	PAP/2014/0432	NS	0.11	loss of factory
Lane's Yard	Lea Marston	PAP/2017/0234	NS	0.02	B2
3 Springhill	Arley	PAP/2017/0179	NS	0.01	B8
Plot W1A	Dordon	PAP/2018/0284	NS	0.1	B1(a)
Park Gate Farm	Middleton	PAP/2018/0696	NS	0.29	Other
Land rear of unit 12B	Atherstone	PAP/2018/0475	NS	0.15	B1(c)
Langley Brook business park	Middleton	PAP/2018/0711	NS	0.30	B8
Magna House	Atherstone	PAP/2019/0403	NS	0.04	loss of office
The Boot	Grendon	PAP/2019/0151	NS	0.07	A4, A1, B1(a), D2
The Black Swan	Grendon	PAP/2017/0219	NS	0.01	A3
				1.1	

Loss of Employment Land

Unit 6	Atherstone	PAP/2017/0673	NS	0.04	loss B1/B2/B8
				0.04	

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2020/21

Completions of above 0.4 hectares

Site		Planning application number	Status	Size	Use class
Land north east of the Beanstalk - Plot 7	Dordon	PAP/2015/0679	COM	2.2	B1, B2, B8
Kingsbury Road	Dordon	PAP/2017/0521	COM	0.99	A1, Other
Power Station B Site	Hams Hall	PAP/2018/0036	COM	20	B1, B2, B8
Plot 13 Marconi Way	Hams Hall	PAP/2018/0763	COM	1.069	Office
				24.259	

Outstanding applications of over 0.4 hectares

Site		Planning application number	Status	Size	Use class
Coleshill Hall Hospital	Coleshill	PCOLXX/1274/99/FAP	UC	16.38	B2
Dosthill	Dosthill	PAP/2013/0298	UC	6.76	B1, B2 & B8
Core 42	Dordon	PAP/2017/0014	UC	17.42	B1(c), B2, B8
SE of Junction 10 M42 (won at appeal)	Dordon	PAP/2018/0149	UC	25.37	B1/2/8
Land south of Rowland Way	Atherstone	PAP/2018/0159	NS	1.92	B1(a), B8
				67.85	

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Completions of under 0.4 hectares

Site		Planning application number	Status	Size	Use class
Plot W1A	Dordon	PAP/2018/0284	COM	0.1	B1(a)
Park Gate Farm	Middleton	PAP/2018/0696	COM	0.29	Other
The Boot	Grendon	PAP/2019/0151	COM	0.07	A4, A1, B1(a), D2
The Black Swan	Grendon	PAP/2017/0219	COM	0.01	A3
				0.47	

Outstanding applications of under 0.4 hectares

Site		Planning application number	Status	Size	Use class
3 Springhill	Arley	PAP/2017/0179	NS	0.01	B8
Land rear of unit 12B	Atherstone	PAP/2018/0475	NS	0.15	B1(c)
Langley Brook business park	Middleton	PAP/2018/0711	NS	0.30	B8
Lanes Yard, Kingsbury Road, Lea Marston	Lea Marston	PAP/2020/0109	NS	0.30	B2
Crida House	Curdworth	PAP/2020/0269	NS	0.24	B1(c)
Town Council Offices	Atherstone	PAP/2020/0056	NS	0.01	B1(a)
				1.23	

Loss of Employment land

BEC Engineering Ltd	Atherstone	PAP/2014/0432	NS	0.11	loss of factory
Unit 6	Atherstone	PAP/2017/0673	NS	0.04	loss B1/B2/B8
Magna House	Atherstone	PAP/2019/0403	UC	0.04	loss of office
Britannia Works	Atherstone	PAP/2020/0568	NS	0.03	loss of B2

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				0.22	
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2021/22

Completions over 0.4 hectares

Site		Planning application number	Status	Size	Use class
Core 42	Dordon	PAP/2017/0014	COM	17.42	B1, B2 & B8
SE of Junction 10 M42 (won at appeal)	Dordon	PAP/2018/0149	COM	25.37	B1/2/8
				42.79	

Outstanding over 0.4 hectares

Site		Planning application number	Status	Size	Use class
Coleshill Hall Hospital	Coleshill	PCOLXX/1274/99/FAP	UC	16.38	B1/2/8
Dosthill	Dosthill	PAP/2013/0298	UC	6.76	B1/B2/B8
Land south of Rowland Way	Atherstone	PAP/2018/0159	NS	1.92	B1(a), B8
				25.06	

Completions under 0.4 hectares

Site		Planning application number	Status	Size	Use class
Land south-west of M42 roundabout Dordon	Dordon	PAP/2021/0108	COM	0.23	B8
112 High Street	Coleshill	PAP/2021/0139	COM	0.02	loss of office
				0.25	

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Outstanding under 0.4 hectares

Site		Planning application number	Status	Size	Use class
Magna House	Atherstone	PAP/2019/0403	UC	0.04	loss of office
Lanes Yard, Kingsbury Road, Lea Marston	Lea Marston	PAP/2020/0109	NS	0.30	B2
Crida House	Curdworth	PAP/2020/0269	NS	0.24	B1(c)
Town Council Offices	Atherstone	PAP/2020/0056	NS	0.01	B1(a)
Britannia Works	Atherstone	PAP/2020/0568	NS	0.03	loss of B2
Kingsbury Link	Kingsbury	PAP/2021/0220	NS	0.01	B1(c)
70-72 High Street	Coleshill	PAP/2021/0289	NS	0.07	loss of office
104, High Street	Coleshill	PAP/2020/0031	NS	0.08	loss of office
133a, Long Street	Atherstone	PAP/2020/0144	NS	0.00	loss of office
Westbourne Leisure, 45 Parkfield Road	Coleshill	PAP/2020/0494	UC	0.03	loss of office
				0.81	

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2022/23

**TO BE COMPLETED
Completions over 0.4 hectares**

Site		Planning application number	Status	Size	Use class

Outstanding over 0.4 hectares

Site		Planning application number	Status	Size	Use class
Coleshill Hall Hospital	Coleshill	PCOLXX/1274/99/FAP	UC	16.38	B1/2/8
Dosthill	Dosthill	PAP/2013/0298	UC	6.76	B1/B2/B8
Land south of Rowland Way	Atherstone	PAP/2018/0159	NS	1.92	B1(a), B8
				25.06	

Completions under 0.4 hectares

Site		Planning application number	Status	Size	Use class
Land south-west of M42 roundabout Dordon	Dordon	PAP/2021/0108	COM	0.23	B8
112 High Street	Coleshill	PAP/2021/0139	COM	0.02	loss of office
				0.25	

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Outstanding under 0.4 hectares

Site		Planning application number	Status	Size	Use class
Magna House	Atherstone	PAP/2019/0403	UC	0.04	loss of office
Lanes Yard, Kingsbury Road, Lea Marston	Lea Marston	PAP/2020/0109	NS	0.30	B2
Crida House	Curdworth	PAP/2020/0269	NS	0.24	B1(c)
Town Council Offices	Atherstone	PAP/2020/0056	NS	0.01	B1(a)
Britannia Works	Atherstone	PAP/2020/0568	NS	0.03	loss of B2
Kingsbury Link	Kingsbury	PAP/2021/0220	NS	0.01	B1(c)
70-72 High Street	Coleshill	PAP/2021/0289	NS	0.07	loss of office
104, High Street	Coleshill	PAP/2020/0031	NS	0.08	loss of office
133a, Long Street	Atherstone	PAP/2020/0144	NS	0.00	loss of office
Westbourne Leisure, 45 Parkfield Road	Coleshill	PAP/2020/0494	UC	0.03	loss of office
				0.81	

Allocations in adopted Local Plan

SITE	USE CLASS	Gross Area – Ha's	Current position as at 31st March 2023
E1 - Holly Lane, Atherstone	B1/B2/B8	6.6	
E2 - West of Birch Coppice	B1/B2/B8	5.1	
E3 - Playing fields south of A5	B1	3.5	
E4 - MIRA	Eg(ii)/B2	42	Planning application has been submitted on a larger site – 60 hectares
TOTAL		57.2	

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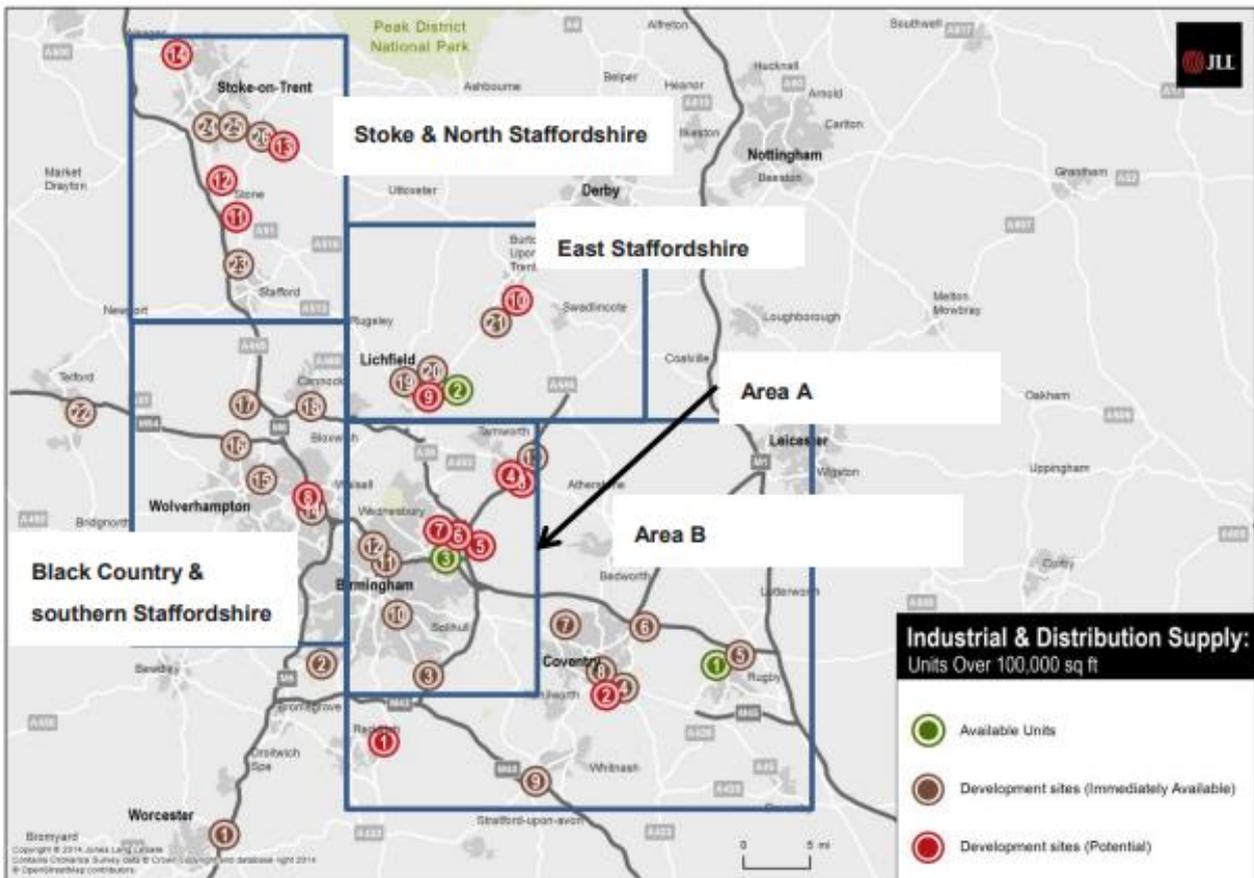
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Total Land Supply as at 31st March 2023

	over 0.4 hectares	under 0.4 hectares	Total
<i>Total Completions Since 2019/20 – 2021/2022</i>			
<i>2019/20</i>	0	0.39	
<i>2020/21</i>	24.25	0.47	
<i>2021/22</i>	42.79	0.25	
<i>2022/23</i>			
<i>Allocations In Local Plan</i>	57.2	0	
<i>Outstanding Sites with Planning Permissions as at 2021/22</i>	25.06	0.81	
Total	149.3	1.92	151.22
<i>Loss of employment land</i>	0	0.26	0.26
Total minus losses			

Extracts from the 2015 West Midlands Strategic Employment Sites Study

Figure 4.11 Immediate and potential industrial land supply, West Midlands, end 2014



Source: JLL

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Table 4.7 Potential industrial land supply, West Midlands, end 2014, 20+ acres

Map No	Site	Size, acres	Developer	Comments
1	Redditch Gateway, Redditch	47	Gorcott Estate, HCA and Stoford	Allocated in draft Stratford core strategy. Awaiting planning consent. Infrastructure required. Site straddles Coventry & Warks and Worcestershire.
2	Coventry Gateway, Coventry	168	Rigby Holdings Ltd	Permission refused at appeal by Secretary of State. Councils intend to re-submit following Green Belt review and adoption of Local Plans
3	Birch Coppice Phase 3, Dordon	70	IM Properties, Hodgetts Estates	Likely to be developed separately based on different ownerships Site has planning consent
4	Land at Junction 10, M42, Phase 2	60	St Modwen	Application for 80,000 sq m submitted in December 2014
5	Land at Hams Hall, Coleshill	50	E.ON	Green Belt
6	Birmingham International Gateway (BIG), Birmingham	227	Prologis, Ashford Development	Green Belt site on boundary of Birmingham and North Warwickshire, being promoted as extension to Peddimore allocation in Birmingham Development Plan
7	Peddimore	175	ProLogis	Allocated in Birmingham Development Plan
8	Phoenix 10, Darlaston	37	HCA	IMI site. Serious issues with ground conditions and access
9	Lichfield Park, Lichfield	24	Stoford Developments	CPO was secured 2014, access bridge close to completion and construction of industrial units will follow
10	Branston Locks, Burton Upon Trent	50	Nurton Developments	Planning permission to be granted in the near future
11	Extension to Stone Business Park, Staffs	33	Stoford Developments	Allocated by the Stafford Local Plan
12	Meaford Power Station, Stone	69	St Modwen	Site has planning permission. Access improvements needed, funding application was unsuccessful
13	Blythe Vale Business Park, Stoke	115	St Modwen	Planning limited to B1. Not being actively marketed.
14	Chatterley Valley, Stoke	112	Harworth Estates	Ground remediation and levelling issues
Total		1,237		

Source: JLL

Evidence

NPPF	2021
North Warwickshire Local Plan (NWLP)	adopted 2021
NP's	
Coventry & Warwickshire HEDNA	2022

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Strategy for Lorry Parking in England (DfT, 2009)

Further to the Lorry Parking Baseline Report, the DfT published its Strategy for Lorry Parking Provision in November 2009.

This sets out strategic objectives for lorry parking provision:

- Build on the current understanding of lorry parking provision and investigate the demand requirements up to 2014 – 2019 and beyond if necessary;
- Define the position of lorry parking policy at national, regional and local levels where required;
- Support Industry by providing Best Practice Guidance and further information to help stabilise business;
- Create an environment where lorry parking schemes can be brought forward by the private sector as more feasible investment opportunities. To help to make lorry parking businesses more sustainable and competitive;
- Increase awareness of existing lorry parking locations and encourage their appropriate usage. Increase the awareness of areas in need of lorry parking;
- Encourage the development and use of secure lorry parking locations with an added intention of improving working conditions for drivers.

The Strategy also sets out an action plan, focussing on:

- A lorry parking model;
- Policy/planning engagement to facilitate protection/development of lorry parking provision;
- Best practice guidance;
- Financial considerations;
- Consideration of using other sites (such as Park and Rides);
- Reducing inappropriate lorry parking, for example through the use of Traffic Regulation Orders and pay meters;
- Promotion of lorry parking facilities, for example through the Truckstop Guide;
- Use of technology (such as satellite navigation) in identifying lorry parking locations and supporting information such as weight and height restrictions. This could provide benefits for drivers that require an alternative location to park for the night;
- Stakeholder communication; and
- Engaging with European lorry parking projects (e.g. SETPOS).

Background information on Lorry Parking evidence from previous studies and surveys.

Previous studies and surveys.

Approximately 15 years ago the Government produced a number of studies looking in more detail at the issues concerning the movement of freight within Great Britain, across modes, including the nature and composition of freight flows on the major corridors. These include Department for Transport: Delivering A Sustainable Transport System: The Logistics Perspective (December 2008) and Nov 2009 - Lorry Parking Baseline Report, Understanding the Current Situation. These studies identified a number of issues including;

- Freight continues to contribute to congestion on our road networks;
- rail capacity issues arise from increases in freight services;
- noise (particularly for out of hours freight deliveries);

- the overall fuel efficiency of HGVs; and
- highway safety issues and skills shortages, much of which remains/continues today.

As part of the need for investment into the industry in network infrastructure and technology, the need for an action plan or strategy on lorry parking was highlighted, leading up to further work as follows;

The DoT produced a Strategy and Action Plan for Lorry Parking Provision in England (Nov 2009) covering the period 2014 to 2019 and beyond, establishing a series of Objectives and Actions aimed at providing guidance, encouraging provision and improving planning outcomes for lorry parking facilities and services. (See Appx XXXX). Unfortunately many of the objectives and Action Plan aims have not been followed up or supported through investment with the lack of provision continuing to date. A Lorry Parking study was subsequently undertaken by AECOM Consultants for the DoT in 2011. This led up to a national lorry Parking Survey in 2017.

Agenda Item No 9

Local Development Framework Sub-Committee

11 September 2023

Report of the Chief Executive

The Coventry Local Plan Review Issues and Options (Regulation 18) Consultation (2023)

1 Summary

- 1.1 This report brings the Coventry Local Plan Review Issues and Options (Regulation 18) Consultation (2023) for consideration by Members.

Recommendation to Sub-Committee:

- a That Members note and agree the observations raised on the Coventry Local Plan Review Issues and Options (Regulation 18) Consultation (2023) and,**
- b That any additional comments Members may raise following consideration at this Sub-Committee be forwarded to Coventry City Council.**

2 Consultation

- 2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.

3 Coventry Local Plan

- 3.1 Coventry City Council adopted its Local Plan and accompanying Area Action Plan for the City Centre in December 2017 addressing the development needed up until 2031. Current planning legislation 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. The Local Plan review will be looking forward to 2041 in terms of addressing future needs.
- 3.2 As a consequence, the City Council are currently consulting on the plan review (The Issues and Options Consultation) from Tuesday 18 July with the final day for comments on Tuesday 12 September 2023. In terms of comments and responses from the Borough Council these will be focused on the Local Plan review rather than the associated Area Action Plan (Chapter 14 of the

Document). The City Council is also undertaking a call for sites for consideration towards helping meet Coventry's growth needs.

3.3 The City Council's approach to the Local Plan review is to highlight and summarise current policy for ease of reference, and then explain where and why they believe it needs changing and why, and where new policy needs to be introduced. In terms of those policy areas likely to have most impact and relationship with North Warwickshire, and to which input and comments would be useful/helpful the following summary may help;

- **Health and Wellbeing policy** – proposal to widen the policy (HW1 for all major developments to demonstrate how health issues have been considered and addressed, with development threshold options) to address health issues, through design to support active mental and physical health.
 - North Warwickshire comment – approach is supported.
- **Levels of growth and the Duty to Co-operate** – Proposed to use the HEDNA figures for housing need but remove the 35% uplift requirement.
 - North Warwickshire comment – There is some support for this approach in recognition of the arbitrary nature of the national imposition of a 35% housing uplift to Cities. However, some concerns remain regarding the need to maintain housing number flexibility. This could be addressed through housing figures being identified as 'minima' and perhaps provide reserve housing sites, to reduce the potential cross border pressures for adjoining local authorities having to accommodate any shortfall identified at subsequent planning examinations.
- **Employment Land Needs** – 156.1 ha Employment Land Needs identified within the HEDNA are noted as well as the wider regional and sub-regional pressure and demand for 'strategic B8' noted in the HEDNA. No specifics are proposed, simply comments sought.
 - North Warwickshire comment – Although it is noted the 'strategic B8' is a thorny issue across the Coventry Warwickshire sub-region and wider region. Nevertheless, and notwithstanding any data and outcomes from the WMSESS evidence currently being drafted, the Borough Council believe the Issues and Options consultation should indicate firstly a commitment to addressing Coventry's employment land needs of 156.1 ha's and secondly, to seek to identify opportunities for addressing the 'strategic B8' need, which could include looking at significant employment site redevelopment or "churn" as an approach that could help address that strategic need.
- **Duty to Co-operate** – Amendments proposed to Policy DS2, removing Part 3 of the policy referring to supporting joint evidence and expanding this to refer to the delivery of joint projects where they support the objectives of the relevant plans. In addition, a strengthened reference to a joint monitoring approach is sought.
 - North Warwickshire comment – approach is supported particularly around joint monitoring. Also recommended retention and continuation of Duty to Co-operate approach to ensure issues are widely discussed and addressed.

- **Chapter 4: Jobs and Economy** – general policy approach is to update policies to reflect changes in Use Classes, try to address permitted development rights relaxations implications. Further research is proposed for Policy JE5 on ‘Location of R&D, Industrial and Storage / Distribution Development’ and strengthening tourism and employment opportunity accessibility.
 - North Warwickshire comment – approach is supported. Nevertheless, in relation to JE5 the earlier concerns and comments made on “Employment Land Needs” in respect of separating out ‘strategic B8’ and not specifically addressing the issue within the Local Plan review, should be re-iterated.
- **Chapter 5: Housing** – Review notes the need for updating in terms of the quantum of development and accommodating as much of the identified need as possible . Further work on ‘densification’ and use of ‘brownfield first’ approach to be applied as part of the review to the plan. New standards also proposed to address climate change, propose to formally introduce the Nationally Described Space Standards. and updating terminology and new / emerging models of housing, First Homes, Build to rent, ‘Co-Living’ and Custom and Self Build etc either market or affordable (or both).
 - North Warwickshire comment – approach is generally supported subject to further future detail comments on policy drafts.
- **Gypsy and Traveller Accommodation** – Notes that the policy needs updating to reflect current circumstances. Identifying opportunity sites that may address shortfall and recommends that the criteria in policy are updated. However, in respect of Transit “arrangements, although the GTAA recommends that the Council develops a negotiated stopping policy to help deal with the number of unauthorised encampments, the review indicates this kind of policy sits outside the scope of the Local Plan as the GTAA does not require identifying a particular permanent site. If a site is required it will be addressed through the specific updated planning policy.
 - North Warwickshire comment – approach is generally supported. There are some concerns and caveats in terms of the GTAA transit site approach (although there is no actual requirement to provide a site as such)Further detail is needed before comments on the transit site issue can be provided and how it will be addressed in policy drafts.

3.4 Other policies within the housing section are more site or topic specific such as Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation, Policy H9: Residential Density, Policy H10 student accommodation, and Policy H11 Homes in Multiple Occupation (HMOs), which are available for Members to consider in the attached Non-Technical Summary in Appendix A. Most relate to issues directly impacting on Coventry housing functions but with less relationships, impacts or effect on North Warwickshire.

3.5 Similarly, the remaining sections deal primarily with updating and improving current Coventry City and community specific policies, environmental policies, Green Belt and retention of safeguarded sites within the Green Belt, design and

historic environment policies on which is not considered necessary to comment, as these do not directly impact on North Warwickshire Borough planning issues currently.

4 **In Summary**

4.1 This Council is in general support of the Coventry Local Plan Review Issues and Options (Regulation 18) Consultation (2023) subject to the comments made above.

4.2 To note any further comments and observations Members may make towards the Coventry Local Plan Review Issues and Options Consultation (2023) and any strategic issues arising and potentially impacting on the plan and other partner local authorities.

5 **Report Implications**

5.1 **Environment and Sustainability Implications**

5.1.1 The Coventry Local Plan Review Issues and Options (Regulation 18) Consultation (2023) has a separate sustainability appraisal and Habitats Regulation assessment (HRA) included as part of the consultation process.

5.2 **Risk Management Implications**

5.2.1 The amendments to the Duty to Co-operate policy are noted but the situation will need continued monitoring in order to mitigate any future risk or pressures arising from development capacity shortfalls within Coventry City area. No further specific risk management implications noted.

5.3 **Legal Implications**

5.3.1 Although the Planning and Levelling up Bill proposed abolition of the duty to co-operate under the Planning and Compulsory Purchase Act 2004, it remains in force in relation to preparation of local plan documents. The Borough Council supports Coventry City’s intention to maintain current approaches and jointly work with or monitor other specified authorities and persons via effective and appropriate means (as must this Council) in the preparation of such documents.

The Contact Officer for this report is Mike Dittman (719451).

Local Government Act 1972 Section 100D, as substituted by the Local Government Act, 2000 Section 97

Background Paper No	Author	Nature of Background Paper	Date



Coventry Local Plan Review

Regulation 18: Issues and options consultation

Non-technical summary – July 2023



Coventry Local Plan Review : a non-technical summary

What is the Local Plan and why are we reviewing it

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.

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.

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 policies we should be introducing.

In particular we need to be considering the review of the plan in the light of changes to [national government planning policy](#), and the Council's priorities including the [One Coventry Plan](#) and the emerging [Climate Change strategy](#).

How to comment

We are consulting on our ideas for updating the plan (The Issues and Options Consultation) from Tuesday 18 July with the final day for comments on Tuesday 12 September 2023. The document where we review the policies and ask questions about our proposals is called Issues and Options and it is supported by a Sustainability Appraisal and an Equalities & Health Impact Assessment which you can also comment on.

If you are viewing this online the best way to respond is to comment online using our [consultation portal](#). This is our preferred approach as you can manage your own account and keep your details up to date.

You can also come and see us at our drop in sessions, or book on to one of our webinars to find out more. We will put copies of the timetable for these in the libraries and will put all information on our [consultation web page](#).

You can also scan the code at the end of this document to take you to our web page

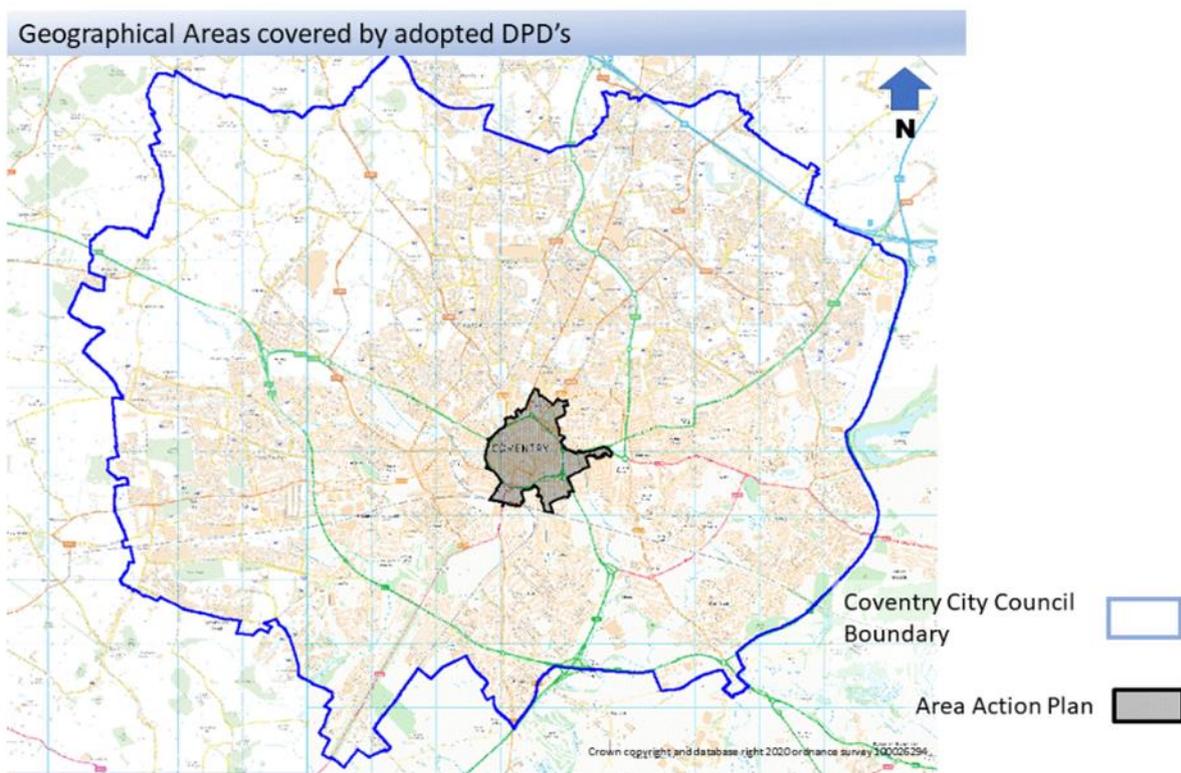
What happens after the consultation has finished

We will review everyone's comments and use them to help us write the updated policies. We also need to ensure that we have detailed evidence to demonstrate that the policies are workable and can be delivered. We have some of that evidence already which we will publish [online](#) to help inform the consultation and we explain this in a series of topic papers on a range of subjects including climate change, health, housing, employment, retail and town centres, biodiversity and green infrastructure, transport. As part of the consultation we will consider what other evidence we may need to help us develop our policies.

We will then consult again once we have drafted the policies, before submitting the documents to Government so that an independent Planning Inspector can examine the plan. The examination normally involves a series of public hearing sessions so that the Inspector can be satisfied that the final plan has been fairly and clearly prepared, is based on robust evidence and can be delivered.

The area covered by the Local Plan and Area Action Plan

The map below shows the area covered by the Local Plan and the Area Action Plan



The policy areas we are reviewing

Health and wellbeing

At the moment the Health and Wellbeing policy is focused upon major planning applications, requiring them to consider health issues by undertaking a Health Impact assessment. We are proposing to widen out the policy so that more proposals must address health issues including the way places are designed to help people keep mentally and physically healthy and active

Levels of growth and the Duty to Co-operate

Local Plans need to plan ahead for the amount of growth they need to accommodate and this needs to be based on up to date evidence. We have worked with our partner Local Authorities in Warwickshire as our housing and economic markets are closely linked, and we have recently published the Housing and Economic Development Needs Assessment (HEDNA) which sets out how growth should be calculated and explains this in detail.

The Government sets out how we should calculate our housing needs using the 'standard methodology'. One of the inputs to the 'standard method' uses population projections from 2014, and these have found to be inaccurate for Coventry. Using the calculation, Coventry would need to deliver 3,188 homes each year as a minimum (using 2021 as the starting point, at least 63,760 homes over the plan period to the year 2041)

Given that the 2014 population projections are wrong, we are proposing to use the more up to date 2021 Census figures in our calculation as we feel they are more accurate (this is the figure the HEDNA uses), this results in 1,964 homes a year (at least 39,280 homes over the plan period to 2041)

However, the way in which we are required to calculate our figures means that the Government adds in an 'uplift' of 35% for a number of cities of which Coventry is one. Without this 'uplift', Coventry would need to deliver at least 1,455 homes each year or 29,100 over the plan period to 2041.

We are asking for feedback on what level of growth is appropriate for the city to help us meet our needs (see the housing section), and we know we need to do further work to look at how much capacity we have (given that some of this growth is already underway).

In terms of employment the HEDNA calculates that we need to deliver around 8.5 hectares of office space, and 147.6 hectares of general industrial land over the plan period. In the employment section we suggest that we already have enough land allocated to meet this need. However, there is an emerging strategic issue regarding

the demand for modern large logistic sites which is having an impact across the west Midlands region and further evidence is being produced in conjunction with other Local Authorities on this matter to better understand the needs and where such sites should be located.

We need to ensure that we deliver growth in a sustainable way so that we balance our economic, environmental and social needs in a way that is consistent with national policy. We have a legal Duty to Co-operate with various organisations to make sure that this happens.

Jobs and Economy

National Policy has changed in terms of the way in which 'employment' is defined and we need to make sure that our policies reflect this. We think we can strengthen our policies to help ensure that employment development takes account of and helps to address climate change including the 'green economy'.

We need to make sure that we are providing enough employment land to meet our needs.

We need to consider how we will treat planning applications for 'non employment' uses on employment land.

We need to consider how we deal with offices especially now that working patterns are changing rapidly with more remote and hybrid working.

We need to look at the needs of the storage, distribution and logistics sectors including the previously mentioned demand across the West Midlands for strategic, logistics hubs.

We need to better understand the needs of the Research and Development sector and any newly emerging sectors.

We also need to consider whether our tourism policy needs updating.

Finally we are considering whether our policy of accessibility to employment opportunities still remains up to date.

Housing

In addition to how much growth we need, we need to consider whether we need to make any further allocations or whether we could increase the density of development in some areas to help us accommodate our growth needs in line with the national 'brownfield first' policy approach.

We are also asking if anyone has any sites they would wish to have considered to help us meet Coventry's growth needs.

We are also considering introducing new standards for housing, including new building standards to help us address climate change, standards on amenity, and

minimum size standards for dwellings in line with the Government's optional [Nationally Described Space Standards](#).

We are also considering how the plan can better support a range of new and emerging models of housing in appropriate locations, including Build to Rent purpose build housing that is 100% rented out), Co-Living (newly emerging type of accommodation with shared communal space, generally built specifically for that purpose), Custom and Self Build Housing (where individuals or groups of individuals build homes for their own occupation), and Community Led Housing (where a local community group or organisation owns, manages or stewards the homes in a manner of their choosing).

We need to update the plan to ensure that it addresses local housing need in line with Government policy and local evidence. We need to deliver a range of market and affordable products. We also need to ensure that the plan supports the positive management of our existing housing stock including how it can be adapted for better energy efficiency.

In terms of [Affordable Housing](#) (as defined by Government), policy needs updating in line with national policy but also to ensure that it addresses local need in line with the most up to date evidence including the need for social rent, and ensuring that products remain genuinely affordable.

We need to update the Gypsy and Traveller accommodation policy to reflect the latest need as defined in our latest Gypsy and Traveller Accommodation Assessment and we propose some updated criteria for assessing planning applications.

We believe we need to update the policy on Care Homes, Supported housing, Nursing Homes and older Persons Accommodation including whether we should introduce new standards and locational requirements.

In terms of residential density, our policies currently set different standards for housing outside of the ring road and those inside the ring road where a much higher level of density is applied. In order to maximise the best use of brownfield land we consider whether densities could be increased in other locations.

In relation to student accommodation, we consider how we should balance this with the range of other housing needs of the city with the growth ambitions of the universities. We also review locational issues and ask whether we should introduce standards for student accommodation to ensure it is well designed, genuinely affordable, inclusive and sustainable.

In terms of the Homes in Multiple Occupation policy we are suggesting that this may not be needed as we are producing a separate set of policies on HMOs through a new Development Plan Document.

Retail and Centres

Many changes have taken place within the retailing sector since the adoption of the Local Plan 2017. There is now an opportunity to revise outdated retailing policies to reflect recent changes in this sector. National policy now allows much more flexibility, whereby town centre uses that would once previously have needed planning permission can now change to other uses without the need for a planning application. The aim of this was to make sure that town centres could adapt rapidly to changing economic and social circumstances. We need to make sure that our retail and town centres policies reflect national change, and consider how we review our network of centres across Coventry (City centre, major centres, district centres and local centres) to see if they still fulfil that purpose. We also need to review how we deal with proposals for town centre uses (such as retail, leisure, offices, and hotels for example) which fall outside of these boundaries, so that we are not undermining the function of our centres.

We are considering ways to update our hot food takeaway policy to make sure it complies with national policy, and which states an exclusion zone around schools (5 minutes walk time – approximately 400m).

We are also seeking ways to protect smaller shopping parades including a possible new policy which emphasises the need to consider their importance to the local community.

Communities

We are considering whether our policies on communities need strengthening. We suggest that the definition of 'community premises' might need broadening in a way that reflects the needs of a particular community especially in terms of being able to access local services and facilities without the need for a car.

We are also suggesting that educational facilities should only be redeveloped if they are genuinely no longer needed.

We also propose that Assets of Community Value should be a [material consideration](#) when dealing with planning applications (These include buildings and land etc which are important to a local community and which are then registered as such with the Local Authority so that the community can try and raise the finance to buy the asset if it is for sale, see <https://mycommunity.org.uk/what-are-assets-of-community-value-acv>).

We are also checking to see if people agree that our policy on [Neighbourhood Plans](#) only needs a minor update to bring it in line national policy wording. We have one 'made' (adopted) Neighbourhood Plan at Willenhall and two designated neighbourhood areas (Finham, designated in 2017 and Allesley, designated in 2016) which do not yet have Neighbourhood Plans.

Green Belt and Green Environment

We are suggesting that our adopted policy on Green Belt needs to be updated to reflect national policy wording, and that Local Green Space needs to be a separate policy as again it is treated separately in national policy.

Current policy requires us to review Land south of Westwood Heath Road, Land south of Bishop Ullathorne School, Playing Field South of Finham Park School and Land West of Finham Primary School. This was 'safeguarded' ie removed from the Green Belt to meet longer term development needs so we need to consider whether this remains likely to be needed and further work needs to be undertaken on this issue including discussions with neighbouring councils.

In terms of our policy on Green Infrastructure, we are proposing that this needs strengthening and updating as national policy, and local priorities on climate change have changed quite a bit. We are proposing to include more reference to health and climate change issues, the importance of trees, wildlife habitats and ecosystems. We also think the policy needs updating so it links to work being done in the wider region and to ensure that our green spaces link better together. We are also proposing a series of new standards for developments, and exploring the potential to introduce the [ANGST standards](#) (Natural England standards for Accessible Natural Green Space).

We also think our policy on biodiversity needs updating to reflect changes to national policy on Biodiversity Net Gain (so that developments result in an overall increase in biodiversity of at least 10%) and on emerging proposals for Local Nature Recovery Strategies (LNRS) where Coventry will be working with neighbouring Local Authorities including the West Midlands Combined Authority.

We are also proposing to make clear that policy also relates to 'blue' infrastructure, meaning a range of water bodies eg canals, rivers, ponds etc.

We are suggesting that the plan needs to strengthen tree protection policy as it is an important part of development proposals and general planning applications, we propose that it contains requirements for considering the type of tree, how it should be planted, and a range of other requirements including increased buffer distances to protect ancient woodland.

Design

We suggest that our current design policies are already positively written and flexible enough to be adaptable to a range of circumstances including economic trends. We think the policies could be strengthened to address the needs of an ageing population, to encourage developments to provide for a mix of generations, accommodation types and tenures as part of 'integrated neighbourhoods'.

We also propose that the policy is strengthened to recognise innovative architecture, the historic built environment and to address issues of health and wellbeing through introducing standards for open space, amenity and indoor space.

Heritage

It is proposed to update the heritage section of the Local Plan by including the recently adopted Brownhill Green and Earlsdon Conservation Areas. It is also proposed that the plan provides sufficient flexibility to be able to support new designations and review existing ones should these be needed.

We also propose to amend the policy to directly reference [Historic England Good Practice](#) guidance.

Archaeology

At present, archaeology is covered under heritage policy, but we suggest that it may merit a separate policy. This would provide more detail especially for areas where archaeology is especially important, and would reference good practice guidance from Historic England and standards from the [Chartered Institute for Archaeologists](#), as well as potential new and updated local evidence.

Accessibility / transport

We think that the transport and accessibility policies need updating to reflect national policy, the Council's recently adopted [Transport Strategy](#) and the emerging [climate change strategy](#).

We think that transport policy needs to reduce dependency upon the car, with more emphasis upon walking and cycling (including cycle hire), public transport including innovation such as the electric bus and the Very Light Rail rapid transit network as well as supporting other public transport types such as rail. We also need to consider how we encourage electric vehicles, and what we should do about parking standards and how we might review these. We also need to consider including reference in policy to Mobility Credits (vouchers which residents can use to pay for various forms of sustainable travel).

In terms of freight, policy needs to reflect Government strategy which plans to decarbonise the freight industry. Where new developments are proposed to operate for 24 hours a day it is proposed to require them to provide overnight facilities such as toilets and showers. It is also suggested that developments should demonstrate that they will use only main roads and not smaller residential roads. It is proposed that 'freight consolidation centres' could be supported in appropriate locations, where goods are then distributed via smaller vehicles, keeping large HGVs out of the city centre.

Environmental Management

We think that our policy on climate change needs revising to bring it up to date with international, national and local climate change strategy and policy. We need to set out how policy will help us achieve net zero carbon in all new developments and we think we need to include new standards for biodiversity as set out earlier in this summary. We also think we should be promoting the benefits of high density urban living with high quality design.

The Council will be developing an Adaptation and Resilience Plan for the city but we believe the [WMCA Climate Change Adaptation Plan](#) should be considered to address this issue and policy should reflect this.

The Council will also be seeking to encourage and support the development of net zero neighbourhoods and more liveable neighbourhoods designed in response to tackling the causes and consequences of climate change which could include community heat networks, provision for battery storage fed by renewable energy sources, infrastructure to support active travel modes, Electric Vehicle charging, green space, sustainable drainage, and trees to provide biodiversity, drainage and shade, alongside opportunities for community food growing. Policy needs to support this.

We currently have a policy (EM2, Building Standards) which we consider may need a total review to ensure that standards reflect the local context. Currently, our standards defer to the [Building Regulations](#) which aim to achieve zero CO2 emissions by 2050. The Building Regulations will change in 2025, bringing in the [Future Homes Standard](#). However the council wishes to set more ambitious targets and is considering what these might be and how these should be included in planning policy in a way which is realistic, viable and deliverable.

In terms of renewable energy generation we believe we need to ensure policy is updated so that it reflects national policy, supports suitable development and considers whether sites should be identified. We are also considering whether new developments should be required to include some level of renewable provision.

In relation to flood risk management including sustainable drainage systems and redevelopment of previously developed land, we think our existing policies need updating to bring them in line with the approach and direction set out in national policy and also the council's [Local Flood Risk Management Strategy](#) and [draft Climate Change Strategy](#). There is also a proposal to develop further guidance at a later stage through a Supplementary Planning Document.

In terms of air quality, we consider our current policy remains up to date as it links to our designated Air Quality Management Area however the policy could be strengthened to include reference to the [Ministerial Direction](#) for nitrogen dioxide, and also to refer to local supplementary policy.

We consider our waste management policy remains up to date There are no further plans from a waste management perspective to bring forward any sites for the

dedicated management of waste in the city. The Mixed Recycling Facility is being developed with an expected completion in summer 2023. The Council's wider Waste Strategy is still valid, and unlikely to be reviewed until the Government undertakes a review at a national level.

In terms of our minerals policies, we think these remain up to date as they accord with national policy and guidance.

Connectivity

Our current policies on broadband, mobile internet and telecommunications are considered up to date, however they duplicate national policy and may not, therefore be needed.

We need to update our policy on Developer Contributions to remove reference to the Community Infrastructure Levy (CIL) as Coventry City Council does not use this method, however we think we need to more generally refer to 'developer contributions' as the government is proposing to reform the system but clarity on recent consultations is awaited.

We also need to update the infrastructure delivery plan – this shows how development is supported by the right infrastructure

The Coventry City Centre Area Action Plan (AAP)

Given the changing nature of the city centre and changes in the wider structure of the economy and society across the region and country, and the increasing need to be adaptable, resilient and responsive to rapidly changing circumstances we are seeking views on the role of the AAP.

We are considering options for the best ways of planning for the city centre including whether the AAP remains fit for purpose or whether other mechanisms might be more appropriate, for example masterplans.

Call for Sites

In order to accommodate development over the plan period we need to consider a range of sites and whether they may, or may not, be suitable for a proposed use.

For anyone interested in having land considered we attach a form at Appendix 1 of the main consultation document.

For more information on the Local Plan Review, and to view our consultation webpage, scan the code below.



Agenda Item No 10

Local Development Framework Sub-Committee

11 September 2023

Report of the Chief Executive

Plan-making reforms: consultation on implementation

1 Summary

- 1.1 The report brings information on the plan making reforms consultation by national Government and seeks Members support for the views expressed in the report and to make any additional comments for consideration by Executive Board.

Recommendation to Executive Board

That the views of the Sub-Committee be expressed to Executive Board in their consideration of the proposed plan making reforms.

2 Consultation

- 2.1 Consultation has taken place with the relevant Members and any comments received will be reported at the meeting.

3 Introduction

- 3.1 The national Government issued a consultation on plan making called “Levelling Up and Regeneration Bill: consultation on implementation of plan-making reforms” on 25 July 2023. The consultation can be found at: <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation>. The closing date for comments is 18 October 2023.
- 3.2 The consultation seeks views on national Government proposals to implement the parts of the Levelling Up and Regeneration Bill which relate to plan-making, to make plans simpler, faster to prepare and more accessible. The aim is to make local plans (and minerals and waste plans) simpler to understand and use, and positively shaped by the views of communities about how their area should evolve. Government wants plans to:
- 1 clearly show what is planned in a local area – so that communities and other users of the plan can engage with them more easily, especially while they are being drawn up;
 - 2 prepared more quickly and updated more frequently to ensure more authorities have up-to-date plans that reflect local needs; and,

- 3 make the best use of new digital technology, so that people can get involved without having to go through hundreds of pages of documents at council offices and to drive improved productivity and efficiency in the plan-making process.
- 3.3 The consultation document includes a summary of the main changes which has been reproduced below:

“Detailed summary

1. *The purpose of the planning system is to contribute to the achievement of sustainable development. Local plans and minerals and waste plans are the foundation of the system’s delivery of this purpose. Their role is to support the delivery of the homes and development this country needs, and protect and enhance our natural, built and historic environment. Plans are made with the support of local communities – and that requires people to know development will be beautiful and well-designed, accompanied by the right infrastructure, approved democratically and that it will protect and enhance the environment and create proper neighbourhoods.*
2. *Our vision is for plans to be simpler to engage with and use, and more accessible to all users, with better opportunities for communities to shape the way their area meets its needs and evolves over time. They will show, more transparently, what is planned – so that users can engage easily and support high quality development that benefits people, improves places, and delivers sustainable development. They will be anchored in consistent, accurate, open data and tailored to the needs of their users. And they will be simpler and faster to prepare.*
3. *The Levelling Up and Regeneration Bill enables a more streamlined, focussed plan-making process so that local plans and minerals and waste plans can be produced, examined and adopted more quickly, and updated more often. Reducing the amount of work required during the plan preparation process, whilst maintaining and improving the quality of plans, is key to achieving this goal, and the wider reforms in the Bill have a crucial role to play.*
4. *It is anticipated that the reforms in the Bill, along with the implementation proposals being consulted on in this document, will mean that:*
 1. *local planning authorities will have a single local plan which will help to make it clear to applicants and other interested parties the relevant policies that will be considered when determining an application. In addition, minerals and waste plans will be able to be produced by minerals and waste planning authorities as a single document or separate documents (which collectively will make up the plan), or (where possible through local government structure) incorporated into a local plan;*
 2. *the purpose of plans will be defined and their content will be streamlined, with a strengthened role for the strategic vision, which we expect would be developed collaboratively with communities and stakeholders, that should then directly shape the plan (see Chapter 1);*

3. *the repetition of policies across all plans will be eliminated, and plans will be concise and more focused on locally important matters. To assist in achieving this, a new suite of national development management policies will cover common planning considerations that apply widely in decision-making across different authorities. Plans will draw on these policies but not repeat them;*
4. *the plan preparation, examination and adoption process will be more standardised and front-loaded, with plans in place within a 30 month timeframe and the process of updating the plan commencing within five years following adoption of the plan (see Chapter). The new process will be supported by clearer, more streamlined and proportionate evidence expectations to reduce the burden on planning authorities (see Chapter 5);*
5. *the reforms to Strategic Environmental Assessments in Part 6 of the Bill – Environmental Outcomes Reports – will make the assessment process more effective and accessible, and strengthen and clarify the role of assessment in avoiding adverse impacts;*
6. *the introduction of Infrastructure Delivery Strategies in Part 4 of the Bill will strengthen infrastructure delivery, enabling a more strategic and unified approach to infrastructure planning and delivery and allowing planning authorities to plan for the infrastructure that is required to support growth and demonstrate the deliverability of their plan;*
7. *new mandatory “gateway” assessments will ensure a more engaged approach to plan-making and provide greater visibility to key stakeholders and the wider community about how plans are progressing (see Chapter 6). Ultimately, this will reduce the time spent examining the plans, speeding up the process;*
8. *examinations will become more efficient – we propose that they should take no more than 6 months, and that if a consultation on proposed modifications to the plan is needed, this should last no longer than three months in addition (see Chapter 7). We will work closely with the Planning Inspectorate to ensure that these timeframes are routinely adhered to, exploring further opportunities to make examinations faster and more efficient;*
9. *there will be a greater emphasis on community engagement, with more time set aside for participation and consultation which will be longer than the current statutory minimum. To ensure access to all and increase the diversity of communities who engage, traditional in-person methods of engagement will be complemented by a digitally enabled process, supported by development of new guidance on best practise and a digital toolkit showcasing the use of PropTech;*
10. *there will be a new requirement for earlier engagement, including with statutory bodies, to ensure that their input is considered throughout the process and issues are identified as early on as possible;*
11. *in line with our ambitions, plans will wherever possible make the best use of modern technology and be produced digitally, rather than as “analogue” (PDF or paper) documents by default. We want*

- to create a planning world in England featuring digital plans that users can easily search for, engage with and use the information that most interests them. We will work closely with the planning sector to introduce changes incrementally, testing and learning as we go along, including consideration of how digital impacts the different needs of our communities;*
12. *plans will be shorter, more visual and map-based, enabling communities to engage more easily with their content. We will develop and publish digital templates, guidance and best practice to show how this can be achieved;*
 13. *plans will be built on open, standardised data which will be published by planning authorities. We are working to unlock the information and data contained in a plan so it is easier to access, use and update, and we will produce data standards, digital templates, tools and models to support planning authorities in preparing plans in this way;*
 14. *we are also exploring how digital can help the end-to-end plan preparation journey, developing and testing checklists and step-by-step guides and signposted journeys that support, enable, facilitate and encourage makers and users of plans – including communities, planners, developers, statutory bodies and other stakeholders, and the Planning Inspectorate;*
 15. *local development schemes and minerals and waste development schemes will be replaced by a new, simpler requirement to prepare and maintain a local plan timetable or minerals and waste plan timetable, that will make data publicly available in a prescribed digital format (see Chapter 4); and*
 16. *there will be a requirement for planning authorities to commence an update of their plans every 5 years. In certain circumstances, we intend to require planning authorities to commence these updates earlier.*
5. *To support the changes to local plans and minerals and waste plans, in the new system supplementary planning documents will be replaced by “supplementary plans” which will have the same weight as a local plan or minerals and waste plan and other parts of the development plan, and will also be subject to consultation and examination (see Chapter 11). Supplementary plans will help planning authorities react quickly to changes in particular areas (for example, an unexpected regeneration opportunity), or set authority-wide design policies.*
 6. *This consultation also sets out proposals to pilot “Community Land Auctions” (see Chapter 13). Community Land Auction is an innovative process of identifying land for allocation for development in a local planning authority’s area in a way which seeks to optimise land value capture, which is being introduced as a piloted measure through the Levelling Up and Regeneration Bill.*
 7. *The new plan-making process will be supported by other reforms in the wider planning system, including the introduction of the Infrastructure Levy and Infrastructure Delivery Strategies, and Environmental Outcomes Reports. These reforms have been subject to separate consultations, which have now closed. Additionally, reforms under the*

Environment Act 2021 (such as Local Nature Recovery Strategies and Protected Site Strategies), as well as the catchment-based approach in the Plan for Water, will create more certainty for planning authorities about environmental requirements.

8. *We want to ensure a smooth transition to the new system for planning authorities but have heard concerns about the impact on the sector of a large group of authorities commencing plan-making at exactly the same point. We have therefore proposed options for phasing the roll-out of the new local plan-making system from autumn 2024.*
9. *Alongside this we want to ensure that planning authorities are well equipped and supported to deliver development now as well as being ready to adapt to the new measures proposed in the Levelling Up and Regeneration Bill. Through our capacity and capability programme, we are developing and delivering a comprehensive programme of support, working with partners across the planning sector, to ensure that planning authorities have the skills and capacity they need, both now and in the future, recognising the resourcing challenges.”*

4 Observations

- 4.1 Much of the suggested new plan making process is already embedded within the NPPF. As can be seen from the extract below the NPPF already states the following:

“15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

16 Plans should:

- (a) be prepared with the objective of contributing to the achievement of sustainable development;*
- (b) be prepared positively, in a way that is aspirational but deliverable;*
- (c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- (d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- (e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- (f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”*

- 4.2 In many ways the process of plan making at its heart is not changed fundamentally by the new way of proposed plan making. The process and the deadlines for production of documents is however much more prescribed. It is becoming much more standardised across the country in terms of being given a template to work from. In many respects this will make it easier for local

communities to understand the planning policies for an area as they should be in a similar style document wherever you live.

- 4.3 Improved public participation is supported. Engagement, particularly as early in the process as possible is important. Experience tells us having been through three Local Plans and one Core Strategy that it is only at the detailed stage that many people can understand the implications of strategic policies. For example: following the adoption of the Core Strategy people only started to understand its implications when sites were proposed to be allocated through the Draft Site Allocations Plan. Although these sites were policy compliant it was not until this detailed stage many communities understood the true implications of the settlement hierarchy.
- 4.4 In paragraph 3.3 subsection 3 above, it says that the quality of local plans should be improved. There is little to no information as to how “quality” will be measured. Will it be through compliance to the 30-month production timescale, or will it be compliance with the Local Plan template, or will it be through how developments are delivered (although this could be many years after the adoption of the plan). Clarification is requested.
- 4.5 The consultation (paragraph 3.3 section 4.1 above) states that there will be a single plan, a Local Plan. However, it also suggests Supplementary Planning Documents (SPD’s) (paragraph 3.3 section 5 above) will be able to change to Supplementary Plans which would then become part of the development plan and carry the same weight as the Local Plan. Support is given to the change to Supplementary Plans and them being part of the development plan. However, this suggests that there is not a single Local Plan document as some policies will be in the Supplement Documents. Without the detail to understand this further it suggests that national Government is wanting the Local Plan to set out the vision and strategic policies for the area with detailed topics or area specific policies to be in the Supplementary Documents. This means it is not a single Local Plan for the area but a single set of overarching planning policies with additional more detailed ones contained in a range of supplementary documents. This feels like going back to having a Core Strategy with a suite of other documents.
- 4.6 The 30-month production timeline is supplemented by a 4-month pre-production stage. It could be adhered to if all the information were to be available and supplied to the Council at the right time within the process. In addition, it will be important to ensure the Council internal processes including the programming of Board meetings are embedded into the process.
- 4.7 The consultation seeks all Local Plans to contain a Strategic Vision. This as can be seen above in para 15 of the NPPF is already a requirement. For example, in North Warwickshire a vision was included in the Core Strategy and then incorporated into the current adopted Local Plan, having been revised slightly.
- 4.8 Planning needs to be supported by the right infrastructure delivered at the right time to ensure the delivery of development. The consultation seeks

developments to be accompanied by the right infrastructure and changes The current Infrastructure Delivery Plans (IDP's) to Infrastructure Delivery Strategies. They will only work where there is the commitment of the delivery agent and have committed to deliver the infrastructure. To achieve this, agencies must be required to work on the same delivery timelines as the Local Plan and be required to deliver the infrastructure. If not, we will continue to struggle to deliver infrastructure that has been identified and evidenced as part of the Local Plan process. Large, properly planned housing allocations will be pulled back and small sites will continue to be delivered which are too small to seek infrastructure funding. It is essential that all agencies sign up to agree to deliver infrastructure allocated through a local plan and that this takes priority over speculative developments. Commitment is required by the national Government to support a truly plan-led system especially if local engagement is to be meaningful and infrastructure can be planned.

- 4.9 It is accepted that there may need to be a phasing programme of the roll out of the new plan making process. However, there should be an element of flexibility in terms of both from Pins and the local authorities as things, such as staffing levels, can change and will impact on the delivery of the Local Plan on a specified timeline.

5 Report Implications

5.1 Finance and Value for Money Implications

- 5.1.1 It is not known at the present time if the new plan making system will cost any more or less than the previous Local Plans. With an expected timeline of no longer than 6 months to carry out an examination this should make the process cheaper as one of the largest expenses is the Local Plan Inspector. However, this will need to be balanced by the gateway assessments of which there are three, the latter two being carried out by the Planning Inspectorate (Pins).

5.2 Legal, Data Protection and Human Rights Implications

- 5.2.1 The Levelling Up and Regeneration Bill once enacted will lay out the legal process for plan making, supplemented by regulations and guidance, much of which is being developed. This consultation will play a key role in developing that finer detail.

5.3 Environment, Sustainability and Health Implications

- 5.4 The plan making system will continue to consider at its core the environment, sustainability, and health. These matters will need to be part of the assessment of any policies that are developed. Currently that will be through a Sustainability Appraisal which will move to Environmental Outcomes Reporting once these are introduced in the new plan making system.

5.5 Human Resources Implications

5.5.1 A lot of changes are going to take place over the coming years. At times this will mean running two plan making systems which will be time consuming at the same time as trying to ensure the current system continues.

5.6 Links to Council's Priorities

5.6.1 Planning policy work links to all the Council priorities.

The Contact Officer for this report is Dorothy Barratt (719250).

Background Papers

Local Government Act 1972 Section 100D, as substituted by the Local Government Act, 2000 Section 97

Background Paper No	Author	Nature of Background Paper	Date