

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

(Councillors M Watson, Dirveiks, Hayfield, Hobley, Humphreys, Osborne, O Phillips, Ridley, Simpson and Symonds)

For the information of the other Members of the Council

For general enquiries please contact Democratic Services on 01827 719226 or via e-mail:

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LOCAL DEVELOPMENT FRAMEWORK SUB-COMMITTEE

1 JULY 2025

The Local Development Framework Sub-Committee will meet on Tuesday, 1 July 2025 at 6.30pm in the Council Chamber at The Council House, South Street, Atherstone, Warwickshire.

The day after the meeting a recording will be available to 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 26 February 2025** - copy herewith, to be approved as a correct record and signed by the Chairman.

ITEMS FOR DISCUSSION AND DECISION

(WHITE PAPERS)

- 5 **Statement of Community Involvement** - Report of the Chief Executive.

Summary

This report informs Members of minor amendments to the Statement of Community Involvement (SCI) and seeks approval to adopt the SCI in accordance with the Planning and Compulsory Act 2004.

The Contact Officer for this report is Sue Wilson (719499).

- 6 **Coventry and Warwickshire Memorandum of Understanding 2025-** Report of the Chief Executive.

Summary

This report informs Members and seeks endorsement of the Coventry and Warwickshire Memorandum of Understanding.

The Contact Officers for this report are Dorothy Barratt (719250) and Mike Dittman (719451).

- 7 **Draft Employment Development Plan Document** – Report of the Chief Executive.

Summary

This report seeks the Sub-Committee's approval for the Draft Employment Development Plan Document, to be known as the Draft Employment Plan, for consultation subject to the finalisation of the Sustainability Appraisal and Habitats Regulations Assessment.

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

8 **Review of North Warwickshire Local Plan 2021** – Report of the Chief Executive.

Summary

This report reviews the current adopted Local Plan 2021 and recommending the policies which should be the focus for the Issues and Options, Regulation 18 stage.

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

26 February 2025

Present: Councillor Watson in the Chair

Councillors Humphreys and Ridley.

Apologies for absence were received from Councillor Simpson.

Councillor H Phillips was also in attendance.

18 Disclosable Pecuniary and Non-Pecuniary Interests.

There were none declared at the meeting.

19 Minutes of the meeting of the Local Development Framework Sub-Committee held 19 November 2024.

The minutes of the meeting of the Local Development Framework Sub-Committee held on 19 November 2024, copies having been previously circulated, were approved as a correct record and signed by the Chairman.

20 New NPPF December 2024

The Chief Executive provided a summary of the changes to the recently published National Planning Policy Framework and detailed some of the implications of the changes.

Resolved:

That the report be noted.

21 Annual Monitoring Report

The Chief Executive brought to Members the second Annual Monitoring Report following the adoption of the North Warwickshire Local Plan in 2021.

Resolved:

That the Annual Monitoring Report be noted.

22 Update on Forward Planning Work

The Chief Executive updated Members on the work which was underway and the future work of the Forward Planning team, including starting a review of the Local Plan.

Resolved:

- a That the report be supported; and**
- b That the work of the Forward Planning Team be incorporated into the updated Local Development Scheme, which was subject to a later report on the agenda for the meeting.**

23 Local Development Scheme (LDS) February 2025

The Chief Executive brought to Members a revised up to date Local Development Scheme (LDS).

Recommendation to Executive Board:

That, subject to it being noted that the date of publication of submission of the draft Employment DPD and Public Consultation, as set out in Appendix A to the report of the Chief Executive, was Autumn 2025, the Local Development Scheme be approved.

24 Coventry City Council Local Plan Reg 19 Plan Consultation

The Chief Executive informed Members of the consultation on Coventry City Council's Submission Local Plan.

Resolved:

- a That the observations, contained in the report of the Chief Executive, on the Coventry City Council Local Plan Regulation 19 Consultation 2025 be noted; and**
- b That the observations, contained in the report of the Chief Executive, together with comments by Members at the meeting, be forwarded to Coventry City Council.**

25 The South Warwickshire Local Plan Preferred Options Consultation (2025)

The Chief Executive informed Members of the consultation on The South Warwickshire Local Plan, Preferred Options (2025), which was the third stage (Regulation 18) in the process for preparing the new South Warwickshire Local Plan (SWLP). The Preferred Options Consultation and accompanying targeted Call for Sites ran from 10 January to 7 March 2025.

Resolved:

- a That The South Warwickshire Local Plan, Preferred Options (Regulation 18) Consultation (2025) be noted; and**
- b That the suggested responses, contained in Appendix A to the report of the Chief Executive, be included in the formal response to the consultation.**

Councillor Watson
Chairman

Agenda item No 5

Local Development Framework Sub-Committee

1 July 2025

Report of the Chief Executive

Statement of Community Involvement

1 Summary

- 1.1 This report informs Members of minor amendments to the Statement of Community Involvement (SCI) and seeks approval to adopt the SCI in accordance with the Planning and Compulsory Act 2004.

Recommendation to the Sub-Committee:

- a The proposed changes to the Statement of Community Involvement be approved; and
- b The Statement of Community Involvement be adopted

2 Consultation

- 2.1 Councillors Watson and Phillips have been sent an advanced copy of this report for comment. Any comments received will be reported verbally at the meeting.

3 Introduction

- 3.1 The SCI sets out the way in which North Warwickshire Borough Council will involve communities, stakeholders and commercial interests in drawing up Local Development Documents and determining planning applications.

- 3.2 The original SCI was adopted in 2007. An updated version was adopted in July 2024. Some further amendments are now being sought and these are shown using track changes in the SCI attached as **Appendix A**.

...

- 3.3 It is clear from the guidance that not all changes to a SCI require consultation. While regular review and updates are encouraged to ensure effective engagement, there isn't a mandatory requirement for consultation on every change. Planning policy guidance states, "There is no requirement for local planning authorities to consult when reviewing and updating their Statement of Community Involvement." Source: Paragraph: 035 Reference ID: 61-035-20190723. However, significant changes, such as those impacting the overall policy or how the community will be involved, should be consulted on.

- 3.4 It is considered the suggested changes to the SCI are only minor so formal consultation is not needed for these amendments.

4 Next Steps

- 4.1 It is recommended that the Council adopts the revised SCI in line with the Town and Country Planning (Local Development) (England) Regulations 2004.
- 4.2 The effectiveness of the SCI will be monitored through the Annual Monitoring Report process to ensure that the consultation methods set out within the document are working and are kept up to date.

5 Report Implications

5.1 Financial Implications

- 5.1.1 Implementation of the SCI will be used during preparation of the Local Plan, Supplementary Planning Documents and Development Plan Documents as well as be part of the planning application process. Any costs incurred will depend on the type of document being prepared and the type of consultations carried out. Any costs will be subsumed within the Local Plan or the Development Control budgets.

5.2 Legal, Data Protection and Human Rights Implications

- 5.2.1 The SCI is a requirement of the Planning and Compulsory Purchase Act 2004 and should be reviewed every five years starting from the date of its adoption. The relevant regulations in this case are the Town and Country Planning (Local Planning) (England) Regulations 2012. It is considered that the proposed SCI meets the requirements of these regulations.

5.3 Human Resources Implications

- 5.3.1 The Forward Planning Team will be heavily involved with any consultation on documents for the Local Development Framework.

5.4 Risk Management Implications

- 5.4.1 The SCI must be produced as part of the 2004 Act and the process is prescribed.

5.5 Equalities

- 5.5.1 The SCI sets out how the Council will make sure, as far as practicable and within the resources available, all avenues to reach as many people as possible are taken.

5.6 Links to Council's Priorities

5.6.1 The SCI is a key part of the delivery of the Local Development Framework.

The Contact Officer for this report is Sue Wilson (01827 719499).

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

North Warwickshire

Statement of Community Involvement

(SCI)

(-July 2025)



**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, [updated in 2024](#) 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 65,340 people live in the Borough (2021 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 town/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 town/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 Statutory Consultation Bodies ~~and anyone else who has previously signed up to be kept informed of and be involved in development of the Development Plan for North Warwickshire~~. In addition, anyone can sign up, via the Council's website, (<https://www.northwarks.gov.uk/emailupdates>) 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 individual 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 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 [Forward Planning – North Warwickshire Borough Council \(northwarwks.gov.uk\)](http://Forward Planning – North Warwickshire Borough Council (northwarwks.gov.uk)). 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 Council's 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 [Council's Forward Planning](#) Mailing List to [the people that have subscribed to this service in order 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, [if it is considered relevant](#) 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 Town/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	Town/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 Forward Planning is a relatively small team 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 documents

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 at this point – please see Regulation 18 Consultation below</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 town/parish councils, interest groups, landowners/ developers. • Notify relevant consultees, including everyone on the planning policy consultation database, when new evidence is available where appropriate. • 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 if appropriate. • 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 Issues and Options or 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.</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.

<p>The Plan is accompanied by the Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA) and also a Habitats Regulations Assessment.</p> <p>There may be more than one consultation on the draft Plan or targeted consultation on certain issues/policy approaches.</p> <p>Please note that the Council may undertake both an Issues and Options Consultation and then a further consultation on the "Draft Plan" if it is considered necessary.</p>	<ul style="list-style-type: none"> • Make consultation documents available on the council's website, by appointment at the Council House and other locations as considered appropriate such as libraries and leisure centres and use Social/ Local Media to raise awareness • 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)</p> <p>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, by appointment at the Council House 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</p> <p>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.</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

<p>An Inspector, appointed by the Secretary of State, will examine the Plan. It must meet the tests of soundness. The Inspector will 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>	<ul style="list-style-type: none"> • 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>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
Evidence Gathering/identification of issues and options Baseline information and evidence gathering. Undertake further technical work; identify reasonable options.	The Council will <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.
Consultation on draft SPD Formal publication for public consultation of the draft SPD along with associated evidence base documents	<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 (by appointment) 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
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.	<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
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 (by appointment) and other appropriate locations Use social media if appropriate to publicise the consultation

		<ul style="list-style-type: none"> • 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

- 7.87 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 [Submit a planning application | Submitting a Planning Application | North Warwickshire Borough Council \(northwarks.gov.uk\)](http://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

- 9.7 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.
- 9.8 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.
- 9.9 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: [Overview | Planning Guidance | North Warwickshire Borough Council \(northwarks.gov.uk\)](#)

- 9.10 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.
- 9.11 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 site use where the floorspace proposed is 1,000 square metres or more **or** if the site area is one hectare or more.
- 9.12 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.
- 9.13 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.
- 9.14 We will also encourage applicants to undertake 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 C. 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 D.
- 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
 - Historic England
 - Environment Agency
 - Georgian Group
 - Government Office for the West Midlands
 - Health and Safety Executive
 - National Highways
 - Natural England
 - North Warwickshire Town/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 E.
- 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 F and is again prescribed by Regulation⁴.
- 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 fortnightly. 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,

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

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

719226, 719233, 719235, 719286). The weekly list can also be viewed and downloaded from the Council's website at [Development Control – North Warwickshire Borough Council \(northwarks.gov.uk\)](http://Development Control – North Warwickshire Borough Council (northwarks.gov.uk)).

- 10.9 Town/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 – 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 G 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.
- 10.22 If appropriate, case officers will attend public meetings, Town/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.

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.

⁵ Practice Note for Handling Amendments to Planning Proposals, 2013

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 maybe undertaken depending in the nature of the proposal and whether local knowledge is appropriate to 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, along with either Warwickshire County Council Forestry Team or the Council's Tree Officer due to the limited time in which to ~~deal with~~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 planning 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 Town/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 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.

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

Appendices

A	Local Development Frameworks	
B	Equality Impact Assessment	
C	Determination of a Planning Application	
D	Relevant Planning Considerations	
E	Non-Statutory Consultees for Planning Applications	
F	Occasions where the Council is under a Statutory Duty to publicise applications	
G	Neighbour Notification Guide	

Local Policy Documents

Statement of Community Involvement (SCI)

The document you are reading now – it sets out the ways in which the Council will consult on their policy documents. The SCI is subject to independent examination.

Local Development Scheme (LDS)

This sets out the work programme that the Council will work to in order to produce the policy documents.

Annual Monitoring Information

Information is collected on a regular basis and looks at how these policies are being achieved.

Local Plan

Development Plan Documents (DPD's)

Development Plan Documents (DPDs)

These documents are subject to independent examination and have Development Plan status. They include:

- * Local Plan
- * Area Action Plans
- * Topic Specific Plans

Neighbourhood Plans

Prepared by Town/Parish Councils
Where required we will consult [using the Local Plan mailing list](#)

**Minerals Local Plan
Waste Local Plan**

Prepared by Warwickshire County Council
They have their own SCI for the production of these documents

Other documents

Proposals Map

Maps showing policies from the Local Plan in a spatial form

Supplementary Planning Documents (SPDs)

These will be consistent with and expand on the policies contained within the DPDs. SPDs do not have Development Plan status and are not subject to independent examination.

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

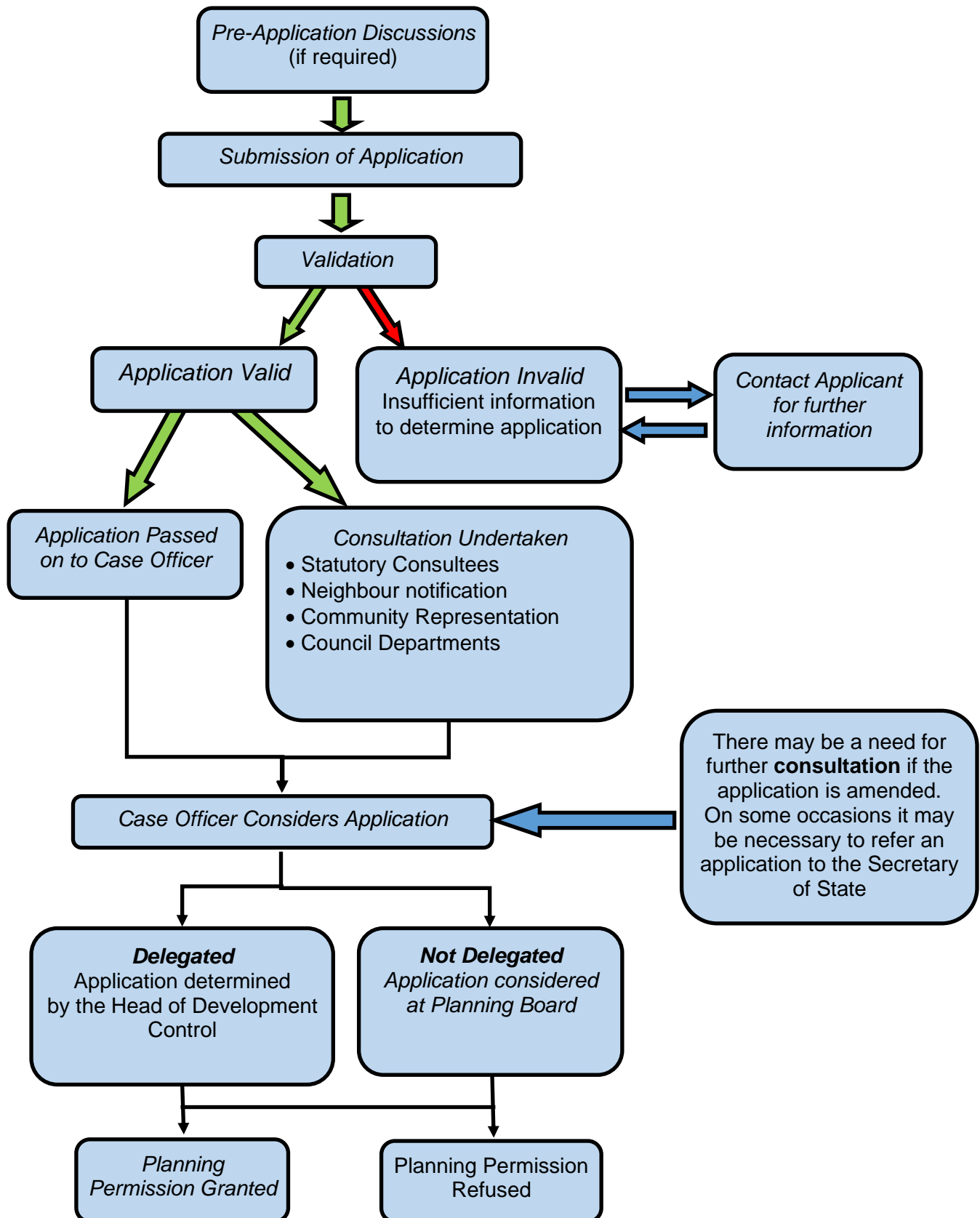
Please show if you believe that this document:

- 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

Appendix E

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
- Listed Building or 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 6

Local Development Framework Sub-Committee

1 July 2025

Report of the Chief Executive

Coventry and Warwickshire Memorandum of Understanding 2025

1 Summary

- 1.1 This report informs Members and seeks endorsement of the Coventry and Warwickshire Memorandum of Understanding.

Recommendation to the Sub-Committee

- a That the Coventry and Warwickshire Employment Memorandum of Understanding is endorsed and signed; and**
- b That the comments and concerns in this Report are forwarded to the City Council, along with any Member comments received.**

2 Background

- 2.1 Coventry, Solihull and Warwickshire Local Planning Authorities have a long history of working closely and co-operatively together on cross boundary matters. Members may recall that the Borough Council agreed back in 2016 to be party to a Memorandum of Understanding (MoU) on housing and employment with authorities from the Coventry and Warwickshire area. The previous round of plan-making relied on these Memorandum of Understanding regarding delivery of housing and employment growth, particularly delivering housing and employment arising from Coventry.
- 2.2 The MoU's helped inform Local Plan requirements across the sub region, as they established a framework for co-operation between the constituent authorities with respect to the delivery of unmet needs for housing and employment across the Coventry and Warwickshire HMA. North Warwickshire accommodated within the adopted Local Plan's housing requirement an element for the unmet housing needs from Coventry. No employment needs were identified as part of the MoU's.
- 2.3 This report now brings to Members attention a new MOU initiated by Coventry as a result of the Coventry City Council Local Plan Review currently at Regulation 19 submission stage, but will also be used by all of the Warwickshire local authorities in the next round of local plans. The MoU is seeking agreement as part of the Duty to Co-operate requirements to demonstrate effective and on-going joint working.

3 The Memorandum

3.1 Attached as **Appendix A** is the new Draft Memorandum of Understanding.

4 Observation

4.1 This new Memorandum is primarily a statement of the current planning situation, using the findings from the various evidence base studies and reports for the Coventry Warwickshire area, including [Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022](#) (HEDNA), the West Midlands Strategic Employment Sites Study (WMSESS) 2023/2024, which further informs the strategic employment needs of the HMA/FEMA, and the Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (2024) that updates the Housing and Economic Development Needs Assessment (HEDNA 2022) employment evidence and presents the current levels of employment need and supply across the HMA/FEMA.

4.2 The MOU is also seeking agreement to an ongoing collaborative process to address the housing and economic development needs of the market area. The MOU does not seek any housing land to be provided within the Borough from within the Coventry and Warwickshire Housing Market Area, which is welcomed.

4.3 However, with regards to employment needs, the MOU highlights a “residual need” of employment land for Coventry. The total local need figure for Coventry for the period 2021-41 was calculated to be 105 hectares. From this Coventry had a supply of 60 hectares and a residual need of 45 hectares. Despite repeated Call for Sites, Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it is unable to accommodate a 45 hectare shortfall. It has also made them aware that a Green Belt site (11 hectares developable to the east of the city) is being promoted but that it has been rejected through site assessment.

4.4 Discussions are ongoing through Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) and the linked Duty to Co-operate Group as well as direct discussions with the associated Local Authorities regarding this matter. There currently remains an outstanding issue that has not yet been resolved. In part this is because most partner authorities are at earlier stages of plan preparation other than in the case of Nuneaton and Bedworth Borough Council. They were in examination with hearings underway with no indication of the extent of any shortfall from Coventry.

4.5 Coventry City is also requesting the signing of Statements of Common Ground (SoCG) with each of the individual authorities partners to the MOU. A copy of the draft SoCG Template is also attached for Members information as **Appendix B**.

- 4.6 Coventry City Council propose the issue of how the employment land “residual need” is to be addressed will be through the process of discussion around the individual Statements of Common Ground with each partner local authority. However, officers have some concerns over this approach in light of previous Inspectors comments around earlier Local Plan Inquiries, such as the Warwick District Local Plan Inquiry in 2015. The Inspector sought clarity over how Warwick DC’s local plan was going to address the unmet housing need existing in Coventry at that time. This resulted in further work between all the partner local authorities to both identify how that unmet need was to be addressed and, more specifically within which partner local authorities and the amount each authority would be able or prepared to accommodate. It is therefore considered that although the Borough Council broadly supports and is prepared to sign the new MOU, the following concerns still need to be raised;
- how the issue of the residual employment need will be addressed needs clarification and confidence in delivery, in order to ensure the Coventry Local Plan review will be considered “sound” by the Inspector at the Local Plan Inquiry
 - that the lack of clarity over how and where this residual need will be met/addressed increases pressure on partner authorities own Local Plan reviews and increases the potential for additional development pressures and needs their own Plan reviews may have to address.

5 In Summary

- 5.1 This Council is in general support of the MOU for the Coventry Local Plan Review submissions stage (Regulation 19) subject to the comments made above and need for clarity on how the identified residual employment need will be addressed.
- 5.2 To note any further comments and observations Members may make towards agreement to sign the MOU and any strategic issues arising and potentially impacting on the plan and other partner local authorities.

6 Report Implications

6.1 Environment and Sustainability Implications

- 6.1.1 The signing of the MOU will support the Coventry Local Plan Review (Regulation 19) submission stage (2025), which has a separate sustainability appraisal and Habitats Regulation Assessment (HRA). Supporting the City Council to achieve a sound Local Plan will also help control and direct development to appropriate sustainable locations and help minimise potential environmental impacts.

6.2 Risk Management Implications

- 6.2.1 The contents of the MOU are noted but the situation will need continued monitoring and negotiation as part of the work on the drafting of the Statement of Common Ground, in order to mitigate any future risk or pressures on our

Local Plan arising from the identified residual employment need capacity shortfall within Coventry City area. No further specific risk management implications noted.

6.3 Legal Implications

- 6.3.1 The Duty to Cooperate was introduced by the Localism Act 2011 and placed a legal duty upon local planning authorities in England to engage constructively, actively and on an ongoing basis with neighbouring authorities on the preparation of a Local Plan particularly to address strategic cross boundary matters. The Duty requires local planning authorities (officers and members) to engage in proactive and sustained joint working to address strategic issues that cut across administrative boundaries from the outset of Plan preparation and come to agreements on solutions, where possible.
- 6.3.2 The Borough Council are supportive of Coventry City intentions to maintain current approaches and joint work or monitoring with other specified authorities and persons via effective and appropriate means (as must this Council) in the preparation of local plan documents.

The Contact Officers for this report are Dorothy Barratt (719250) and Mike Dittman (719451).

1. INTRODUCTION

- 1.1 This Memorandum of Understanding (MoU) has been prepared in accordance with national guidance¹ and is intended to cover matters of strategic importance relevant to all authorities, specifically relating to housing and employment needs across the Housing Market Area (HMA) and Functional Economic Market Area (FEMA).
- 1.2 The intention is that once discussed and supported, through amendments if required, this MoU will be agreed by the following Councils:

Coventry City Council
North Warwickshire Borough Council
Nuneaton & Bedworth Borough Council
Rugby Borough Council
Stratford-on-Avon District Council
Warwick District Council
Warwickshire County Council

2. GEOGRAPHY COVERED BY MEMORANDUM OF UNDERSTANDING

- 2.1 This MoU covers the Local Planning Authorities within the Coventry and Warwickshire HMA/FEMA (C&W HMA). The C&W HMA/FEMA is made up of Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council, Warwick District Council and Warwickshire County Council. It is also acknowledged that North Warwickshire Borough Council and Stratford-on-Avon District Council are also part of the Greater Birmingham HMA.

3. PURPOSE

- 3.1 There is a legal requirement for effective cooperation relating to strategic matters that cross administrative boundaries to be dealt with and evidenced by Statements of Common Ground.
- 3.2 This Memorandum of Understanding seeks to ensure that as the Local Planning Authorities develop their Local Plans, at differing paces, the housing and employment needs of the C&W HMA/FEMA are met. It is framed within the duty to cooperate set out in Section 33A of the Planning and Compulsory Purchase Act 2004 and in the context of the National Planning Policy Framework (2023 & 2024). This sets out the duty for local planning authorities and county councils to co-operate in maximising the effectiveness of the preparation of development plan documents so far as relating to strategic matters which affect more than one local authority area. As many of the local planning authorities in the Coventry and

¹ Planning Practice Guidance Paragraph 011 Reference ID: 61-011-20190315

Warwickshire area are only in the early stages of reviewing their adopted plans (and acknowledging that not all have commenced such reviews, nor are required to at this stage), the situation is evolving in identifying levels of supply for housing and employment needs within authority boundaries. Through capacity assessment and a strategy of promoting best use of development land it is understood that Coventry anticipates being able to meet its own local housing needs as identified in the HEDNA – Table 1.

- 3.3 The Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (November 2024) establishes that Coventry has 105 Ha of local employment need to 2041, a supply of 60ha and a residual need of 45Ha (Table 3). In regard to strategic need, Appendix 1 of the Alignment Report sets out details of committed sites across the FEMA. Discussions with partners as to how to address residual local and strategic employment needs across the FEMA are underway, therefore the MoU is iterative and will be updated as discussions progress.
- 3.4 This Memorandum of Understanding commits Coventry City Council and the five Borough/District Councils within Warwickshire to an ongoing collaborative process to address the housing and economic development needs of the market area and to maintain realistic assumptions about the availability, suitability and viability of land to meet that need. In addition, given the importance of Warwickshire County Council's role and responsibilities within the area they are a signatory to this MoU.

4. POINTS OF AGREEMENT

- 4.1 It is agreed that for plan making purposes there is a housing market area and functional economic market area comprising Coventry and the whole of Warwickshire. In addition, North Warwickshire Borough Council and Stratford-on-Avon District Council fall within the Greater Birmingham and Black Country Housing Market Area and therefore have a functional relationship with that area.
- 4.2 The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA), produced by independent consultants ICENI Projects on behalf of the Coventry and Warwickshire local authorities, sets out an objective assessment of housing need and employment need for the Coventry and Warwickshire area. The figures below are taken directly from the HEDNA and do not include the 35% 'cities uplift' for Coventry (see para.4.6.3)

Table 1: Local Housing Need (dwellings per annum) Trend-based - HEDNA

Authority	HEDNA Housing Need (dpa)
Coventry	1455
North Warwickshire	119

Nuneaton and Bedworth ²	409
Rugby	735
Stratford-on-Avon	868
Warwick	811
Total	4397

Source: Table 5.33 HEDNA 2022

- 4.3 It is agreed that the 2022 HEDNA, utilising 2021 Census Data, forms the most robust evidence base of establishing the housing and employment needs of the HMA/FEMA for plans being prepared by Coventry City Council and Nuneaton and Bedworth Borough Council, under the December 2023 NPPF.
- 4.4 It is agreed that for plans being prepared under the December 2024 NPPF, the HEDNA Housing Needs are superseded by the December 2024 NPPF Standard Method outcomes of Local Housing Need, as shown in Table 2 below.

Table 2: December 2024 National Planning Policy Framework - Local Housing Need

Authority	2024 NPPF Indicative Local Housing Need (dpa)
Coventry	1388
North Warwickshire	364
Nuneaton and Bedworth ³	737
Rugby	618
Stratford-on-Avon	1126
Warwick	1062
Total	5295

Source: NPPF Standard Method December 2024

- 4.5 It is agreed that the West Midlands Strategic Employment Sites Study (WMSESS) 2023/2024 further informs the strategic employment needs of the HMA/FEMA, and that the Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (2024) accurately updates the HEDNA employment evidence and presents the current levels of employment need and supply across the HMA/FEMA.

² Nuneaton and Bedworth Borough Council commissioned a bespoke report 'Towards a Housing Requirement for Nuneaton' to be read alongside the HEDNA which provides more specific consideration of housing and employment need in Nuneaton and Bedworth Borough taking into account relevant local considerations. This identifies a housing requirement of 545 dwellings per annum for Nuneaton and Bedworth Borough.

³ See Footnote 2 regarding the figure for NBBC.

Table 3: Local Industrial Residual Need 2021-41 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	58	5	53
North Warwickshire	60	34	26
Nuneaton and Bedworth ⁴	41	52 ⁵	-11
Coventry	105	60	45
Stratford	144	56	88
Warwick	83	37	46
Total	492	244	248

NB: figures may not sum due to rounding

Table 4: Local Industrial Residual Need 2021-45 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	68	5	63
North Warwickshire	70	34	36
Nuneaton and Bedworth	48	52	-4
Coventry	122	60	62
Stratford	167	56	111
Warwick	97	37	60
Total	572	244	328

Table 5: Local Industrial Residual Need 2021-50 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	80	5	75
North Warwickshire	82	34	48
Nuneaton and Bedworth	56	52	4
Coventry	143	60	83
Stratford	196	56	140
Warwick	113	37	76
Total	670	244	426

- 4.6 Each Council will cooperate in the delivery of the local housing and employment need which ensures that the overall needs across the housing market area will be met. To achieve this objective, it is agreed that:

⁴ Nuneaton and Bedworth Borough Council commissioned a bespoke report 'Towards a Housing Requirement for Nuneaton' and to be read alongside the HEDNA and 'Review of Nuneaton & Bedworth Employment Land Portfolio'. These documents identify a local industrial and warehouse employment need figure for Nuneaton and Bedworth of 66.45 ha.

⁵ Figure only includes allocated sites.

- 4.6.1 At the time of signing this agreement it is considered that the HEDNA and WMSESS Alignment paper constitutes robust evidence for future plan-making for both housing and employment land for Coventry and Warwickshire (noting the provisions for calculating housing need as set out in paragraph 4.3 and 4.4).
- 4.6.2 The local authorities consider that the exceptional circumstances in Coventry and Warwickshire which are identified in the HEDNA⁶, justify a departure from the use of the Government's Standard Method for assessing local housing need, in line with paragraph 61 of the NPPF December 2023⁷.
- 4.6.3 It is agreed the 35% cities uplift applies specifically to the Government's Standard Method as referred to in the 2023 NPPF paragraph 62 and supporting Guidance and has been deleted in the 2024 NPPF revision. It relates only to specific cities and there is no requirement for this to be redistributed. It is agreed this figure was not evidenced by Government and did not reflect local need.
- 4.6.4 All parties will work together to address Strategic Employment Needs as shown in Table 6.

Table 6: Residual Strategic Site needs 2022-2045 – Icení HEDNA - WMSESS Alignment Paper – November 2024

Opportunity area*	Residual Need
Area 5 – North Warwickshire	50 – 100ha
Area 7 – M6/A45/A46/M45 Coventry and Rugby	9 – 84ha
Area 8 – A46 / M40 Warwick	75 – 125ha

*As set out in the WMSESS these are broad areas they do not represent Local Authority administrative boundaries

- 4.6.5 The plan making process will ultimately establish the capacity of each area, and the quantities of housing and employment development that can be delivered.
- 4.6.6 Each local authority is committed to ongoing cooperation and engagement by both officers and members in relation to delivery of housing and employment land for the Coventry and Warwickshire area. Should any authority identify a shortfall, the Local Authorities will seek to work constructively together to explore how the needs of the HMA and/or FEMA may be accommodated within the appropriate geography.
- 4.6.7 This MOU will be reviewed as necessary in light of any changes to the National Planning Policy Framework (NPPF) and any new relevant new legislation.
- 4.6.8 All parties confirm the understanding that Coventry City Council is proceeding with

⁶ See summary section 5, paragraph 5.159 to 5.161 of the HEDNA.

⁷ In line with the Transitional Arrangements under which the Coventry Local Plan is being reviewed.

progressing its plan under the current transitional arrangements and as such it is being prepared in line with the NPPF December 2023. Should this position change the MoU will be reviewed.

5. POINTS YET TO BE RESOLVED

- 5.1 Distribution of housing and employment: if any LPA within the area determines they are unable to deliver the amount of housing or employment as identified in the tables contained in this MoU then further discussions will be held and the MoU will be revised as appropriate.
- 5.2 Coventry City Council considers that it cannot meet its residual need of 45 hectares to 2041 and is requesting assistance from partners across the FEMA to help meet its Local Employment Need shortfall. However, the extent of this shortfall has not yet been agreed with partners and has been subject to challenge by other FEMA authorities. The detailed extent of agreement and disagreement will be set out in Statements of Common Ground with the relevant FEMA authorities.
- 5.3 Discussions regarding strategic employment need are underway across the FEMA in relation to the Opportunity Areas identified in the WMSESS but how this will be accommodated is yet to be resolved.
- 5.4 Rugby Borough Council has identified a need for 47 Gypsy and Traveller pitches beyond that which it can meet within its administrative boundaries. It has written to the other signatories to this MOU, together with its neighbouring authorities in Leicestershire and Northamptonshire to seek assistance in meeting this unmet need.

6. LIMITATIONS

- 6.1 For the avoidance of doubt, this Memorandum shall not fetter the discretion of any of the Councils in the determination of any planning application, or in the exercise of any of their statutory powers and duties, or in their response to consultations, and is not intended to be legally binding but shows clear commitment and intent to meeting the full housing and employment needs of the market area.
- 6.2 The objectively assessed need figures set out in this MOU have not yet been tested at examination and do not supersede the housing or employment land requirements in current local plans.

7. LIAISON

- 7.1 Member level representatives of the Local Authorities will meet when appropriate, in order to:
 - Maintain and update the memorandum, as necessary.

- Monitor the preparation of Local Plans across the six authorities and discuss strategic issues emerging from them.

8. MONITORING

- 8.1 Annual monitoring will be carried out for both housing and employment. This will be overseen by the Joint Monitoring Officers Group (JMOG) for the Coventry and Warwickshire area, who will agree monitoring targets to include permissions and completions.

9. SIGNATORIES

Signed on behalf of Coventry City Council:

Date:

Signed on behalf of North Warwickshire Borough Council:

Date:

Signed on behalf of Nuneaton & Bedworth Borough Council:

Date:

Signed on behalf of Rugby Borough Council:

Date:

Signed on behalf of Stratford-on-Avon District Council:

Date:

Signed on behalf of Warwick District Council:

Date:

Signed on behalf of Warwickshire County Council:

Date:

Coventry City Council Local Plan Review (2021 - 2041)



Statement of Common Ground between
XXXX and Coventry City Council

XXXX 2025

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Organisations

- Coventry City Council (CCC).
- XXXX

Introduction

This Statement of Common Ground (SoCG) identifies areas of agreement and disagreement between CCC and XXXX in relation to the Local Plan Review (2021-2041) and supporting evidence base. This Statement has been prepared to assist the Examination of the Plan and covers the administrative area of CCC.

Coventry is the ninth largest city in England and the twelfth largest in the UK. The administrative area covered by the City Council is primarily urban in nature, with a small area of Green Belt mainly in the north west. The area is physically bounded by Nuneaton and Bedworth and North Warwickshire to the north, Rugby to the east, Warwick to the South and Solihull to the east. However under the Duty to Co-operate the Council works with a wider range of partners on a range of strategic social, economic and environmental issues via the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO). These include Stratford on Avon District Council which is working with Warwick District Council on the South Warwickshire Local Plan, Solihull Metropolitan Borough Council, and Hinckley and Bosworth Borough Council, as well as Warwickshire County Council as the upper tier authority for the Warwickshire Districts and Boroughs. The map at Appendix A shows the geographical relationship between the different authorities.

CCC has fully engaged with XXXX on the development of the Council's respective Local Plans from the outset. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, XXX Council has been formally consulted at every stage of consultation on the Plan Review together with its accompanying Sustainability Appraisal and the Habitat Regulations Assessment. XXX made representations to XXX stages of consultation on the Review. The Duty to Cooperate Compliance Statement outlines in detail the engagement activities and outcomes, together with the joint evidence base studies undertaken during the Plan's preparation.

This SoCG should be read in conjunction with the Memorandum of Understanding (Appendix B) which provides overarching context, with the purpose of the SoCG to provide more detailed articulation of more localised matters.

Strategic matters

The key strategic matters being addressed by this SoCG relate to the quantum of appropriate levels of housing and employment growth, and how it should be accommodated across the Housing Market Area (HMA) and the Functional Economic Market Area (FEMA).

Areas of Agreement

- That CCC has worked collaboratively with XXX to ensure that all cross-boundary strategic issues have been properly considered and where

appropriate reflected in the Plan Review and effective and on-going joint working has and will continue to be undertaken.

Housing Requirements

CCC has worked with adjoining and nearby local authorities within the Coventry and Warwickshire Housing Market Area (HMA) (CCC, North Warwickshire Borough Council, NBBC, Rugby Borough Council, Warwick District Council, Stratford-on-Avon District Council) to consider and agree how the needs of the HMA will be met.

Coventry City Council is progressing its Local Plan Review under the National Planning Policy Framework (NPPF) Transitional Arrangements and is therefore working to the provisions of the December 2023 NPPF.

It is agreed that the joint HEDNA (2022) produced by Iceni for the HMA provides the appropriate evidence base for the setting of a local need figure.

It is agreed that the 35% uplift figure included in the HEDNA calculations but separated out was based upon a national approach to calculating the Standard Method which was unevidenced and arbitrary and did not relate to local need.

It is agreed that the removal of the 35% uplift from the HEDNA calculations is a matter for Coventry to defend at its Examination in Public however this approach is supported in principle, resulting in a requirement figure of 29,100 homes per annum.

Coventry's strategy to accommodate this housing requirement within its own administrative boundaries is supported.

Employment requirements

It is agreed that at this current time the Alignment Paper provides the most up to date evidence which establishes the level of employment need for each of the FEMA authorities, including local need and strategic need.

It is agreed that the alignment paper identifies a local employment need of 105 hectares for Coventry, a supply of 60 hectares and a shortfall of 45 hectares.

It is agreed that Coventry City Council has undertaken extensive work in identifying and protecting employment sites, including five call-for-sites (one specifically focused on employment), a new Employment Land Review which includes identifying key employment sites, and a new Office Market addendum to the ELR.

Where applicable - It is agreed that through **XXX** plan-making process Council **XXX** has identified potential provision for accommodating some of Coventry's local employment shortfall **(add further detail as applicable to relevant council)**

Where Applicable: It is agreed that the authorities will work collaboratively to seek to address any remaining unmet local employment land need following the completion of the current plan-making process for each authority

In terms of strategic need, with the exception of the existing employment allocation at Baginton Fields it is agreed that Coventry is a geographically constrained area and has no sites of a sufficient scale which could contribute to meeting the growth identified in the Alignment Paper for Opportunity Area 7

Areas of Disagreement

To be discussed with each LA as the SoCG is developed.

Further joint working

This Statement of Common Ground will be kept up to date through continuous engagement and cooperation between CCC and XXX. Joint working will continue to take place through the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) group, and the Duty to Co-operate sub group which is focused upon the HMA and FEMA area.

Monitoring

This Statement will be maintained by CCC and updated as necessary with XXX.

CCC will continue to work with XXX beyond the adoption of the Plan Review for the monitoring and implementation of the Plan.

Signatories

Signature:	Signature:
Date:	Date:

Appendix A

North
Warwickshire
Borough

Hinckley and
Bosworth Borough

APPENDIX B

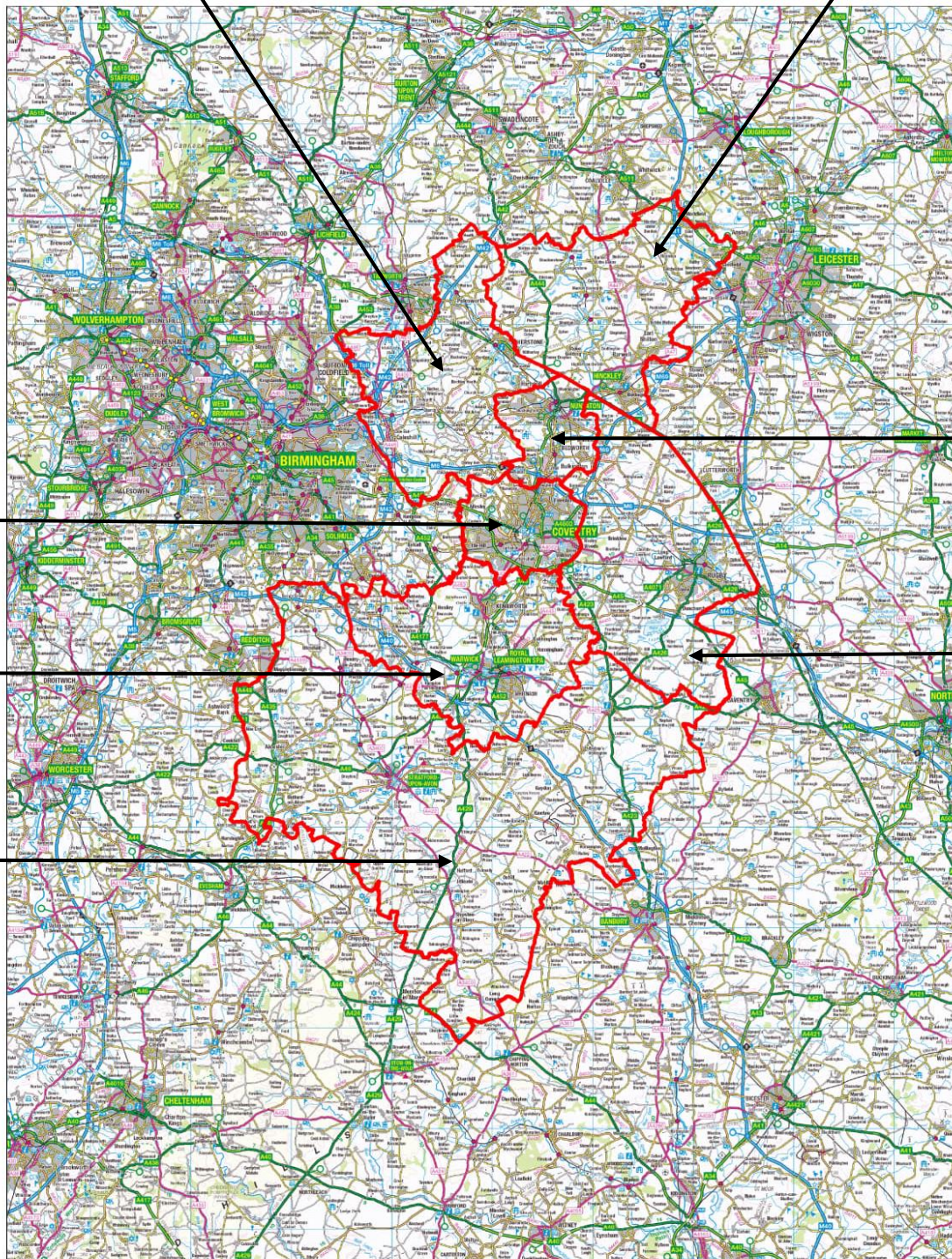
Coventry
City

Nuneaton
and
Bedworth
Borough

Warwick
District

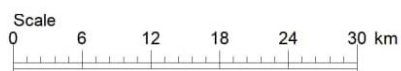
Rugby
Borough

Stratford-
on-Avon
District



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Appendix B MoU

Add in

Agenda Item No 7

Local Development Framework Sub-Committee

1 July 2024

Report of the Chief Executive

Draft Employment Development Plan Document

1 Summary

- 1.1 This report seeks the Sub-Committee's approval for the Draft Employment Development Plan Document, to be known as the Draft Employment Plan, for consultation subject to the finalisation of the Sustainability Appraisal and Habitats Regulations Assessment.

Recommendation to Sub-Committee:

That the Draft Employment DPD can proceed to Regulation 19 consultation subject to the finalisation of the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA).

2 Consultation

- 2.1 Councillors have been sent an advanced copy of this report for comment. Any comments received will be reported verbally at the meeting.

3 Introduction

- 3.1 The Draft Employment Development Plan Document - Scope, Issues and Options went out for consultation between 15 February and 9 May 2024 where a total of 22 responses were received. This consultation complied with Regulation 18 of the Planning and Compulsory Purchase Act 2004. The responses have been considered when preparing this Plan.
- 3.2 In December 2024 the NPPF was changed with the introduction of grey belt within Green Belts. Further advice was published on 27 February 2025. The Borough Council commissioned consultants to undertake a review of the Green Belt in North Warwickshire as part of the plan making process and consider the up-to-date advice on Green Belt / grey belt assessments. This work is currently being carried out with a draft report expected in mid-July.

- 3.3 The Borough Council is keen to keep the momentum going forward with plan making so at the meeting of the LDF Sub-committee in February an updated Local Development Scheme (LDS) was agreed. This indicated that the Employment Plan work would continue but a Local Plan Review would also be started. With the changes to the NPPF and the additional work our consultants are having to do in regard to the Green Belt, the Plan now being proposed is much smaller and focussed on only a few policies. The Draft Employment Plan focusses on land and issues outside of the Green Belt except for one policy seeking to encourage the delivery of an extant planning permission in the Green Belt.

4 **Draft Employment Plan**

- 4.1 The Draft Employment Development Plan Document, to be known as the Draft Employment Plan, is attached as **Appendix A**.
- 4.2 The Draft Employment Plan is essentially a mini local plan covering some employment issues. It will assist with bringing forward employment land in the immediate term as well as indicate where there may be a future possibility of expansion of Birch Coppice, as well as encouraging the delivery of an extant planning permission. Finally, it seeks to have a policy on where lorry parking could be provided by providing a criterion-based policy.

5 **Next Steps**

- 5.1 If Members agree to the Draft Employment Plan consultants will finalise the Sustainability Appraisal and HRA Regulation Assessment. If there are any substantial changes recommended as a result of these reports/assessments a further report will be brought back to the sub-committee in September. If there are no substantial changes a consultation will be organised for a period of 6 weeks. This is likely to start in September 2025.
- 5.2 Responses received during Regulation 19 consultation stage of the plan making process are formal representations and they must consider if the Plan has been positively prepared, justified, effective, and consistent with national policy. Additionally, they must consider whether the plan complies with legal and procedural requirements, including the Duty to Cooperate with neighbouring authorities.
- 5.3 Representations made will be reported back to the Sub-committee.

6 **Report Implications**

6.1 **Financial Implications**

- 6.1.1 Any costs will be subsumed within the Local Plan budget.

6.2 Human Resources Implications

- 6.2.1 The Forward Planning Team will be involved with any further work on the Draft Employment Development Plan Document

6.3 Links to Council's Priorities

- 6.3.1 The Employment Plan will form a key part of the Development Plan for North Warwickshire which impacts on all of the Council's priorities.

The Contact Officer for this report is Dorothy Barratt (01827 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

DRAFT

Employment Plan

Regulation 19



**North Warwickshire
Borough Council**

July 2025

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1 Introduction

- 1.1 The North Warwickshire Local Plan 2021 was adopted in 2021. The Borough Council agreed in June 2023 to review the Local Plan once the Government's revised plan making guidelines issued¹. In the meantime, the Borough Council decided to review the employment policies of the plan and there was a subsequent consultation on the scope, issues and options (Regulation 18) in early 2024. Following the National Planning Policy Framework (NPPF) being updated in December 2024, the Borough Council took the decision to start a review of the adopted Local Plan. This Employment Plan is therefore an interim Plan to provide some update on employment policies prior to the review of the Local Plan.
- 1.2 The Government in December 2024 changed the policy for Green Belt, introducing the concept of land being grey belt within the Green Belt. One of the issues to be considered is the effects of this policy change and considering it across the Borough as a whole. As a result, there are no proposed changes to the Green Belt within this Plan. Any changes will be considered through the Local Plan Review.
- 1.3 This Employment Development Plan Document (to be known as the Employment Plan (EP)) therefore represents a partial review of the adopted North Warwickshire Local Plan 2021. It will amend, replace, or supplement some of the policies in the adopted North Warwickshire Local Plan 2021.
- 1.4 The EP allocates some land for employment use and has a plan period covering the period from 2020 to 2045.
- 1.5 The Development Plan for an area should always be read as a whole. In North Warwickshire this includes the adopted North Warwickshire Local Plan 2021 and various made (adopted) Neighbourhood Plans, prepared by Parish Councils, as well as the Minerals and Waste Local Plans prepared by Warwickshire County Council. This Employment Plan when adopted will also form part of the Development Plan for North Warwickshire.
- 1.6 Appendix A lists the policies from the adopted North Warwickshire Local Plan and indicates which policies remain in force and which policies this Plan replaces or amends.
- 1.7 The Local Plan 2021 can be found at [Local Plan \(Adopted 2021\) | Local Plan for North Warwickshire | North Warwickshire Borough Council](#) on the Council's website.

¹ Source: NWBC Full Council held on 28 June 2023, Item 12, agreed Motion under Standing Order 10.

2 Policy 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 NPPF 2024 states that the economic objective is *“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 (2024) then seeks to build a strong, competitive economy.
- 2.3 It is recognised there will be further changes to the NPPF and these where possible will be taken on board as they become published. One of the main changes will be the publication of the NPPF Development Management Policies which is expected later in 2025.

Economic Development Strategy

- 2.4 The Borough Council has an Economic Strategy which underwent consultation in 2024 and approved by the LDF Sub-committee in July 2024. This document is part of the evidence base for this Plan and can be found at: www.northwarks.gov.uk.
- 2.5 The Economic Strategy has four Priority Themes, and these are:
- Supporting business growth and innovation;
 - Securing a pipeline of talent;
 - Enabling investment in infrastructure to support a low-carbon, modern and forward-looking economy; and,
 - Supporting vibrant town and service centres through quality place-making.
- 2.6 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 Strategy sees the Borough Council’s role and governance as being “A place shaper to promote a positive planning approach”. The four priority themes are:
1. Priority Theme 1: Supporting Business Growth & Innovation
 2. Priority Theme 2: Talent, Employment & Skills
 3. Priority Theme 3: Development & Connectivity
 4. Priority Theme 4: Market Towns & Villages

North Warwickshire Local Plan 2021

- 2.7 The Borough Council adopted the North Warwickshire Local Plan in September 2021. There are a number of policies which impact on employment and so it is important that this Employment Plan continues to be read in conjunction with the adopted Local Plan. The review of the Local Plan will look at the full suite of policies and consider whether they require to be updated in line with the NPPF or for any other reason.
- 2.8 In relation to this Plan Appendix A set out a review of the employment policies and explain which policies are being superseded, amended or remain in force.

3 Local Context

- 3.1 North Warwickshire is a rural Borough lying between the urban areas of Birmingham, Solihull, Coventry, Bedworth, Nuneaton and Tamworth. Over 60% of the Borough falls within the West Midlands Green Belt. The population was around 65,000 in 2021, an increase by some 4.8% from 2011, with an expected rise to 79,120 by 2043 (source: ONS 2018 based projections March 2020). This is lower than the national expected increase of over 6%.
- 3.2 North Warwickshire had approximately 54,000 jobs available, while the working-age population (aged 16–64) was about 39,998 in 2021. This results in a job density of 1.36, meaning there are 1.36 jobs for every working-age resident in the area. (source: Nomis website). In comparison, the employment rate for residents aged 16–64 in North Warwickshire was 74.5% in the year ending December 2023, a decrease from 79.4% the previous year. This indicates that while the number of jobs exceeds the working-age population, not all residents are employed, suggesting that some individuals may be commuting to other areas for work or are economically inactive.(source: Nomis website) The unemployment rate for North Warwickshire was 3.0% for those aged 16 and over in the year ending December 2023, which is lower than the West Midlands average of 3.2%. (source ONS).
- 3.3 It is acknowledged the Borough lies within the Golden Triangle, an area within 4.5 hours of the ports of England and Wales. The Golden Triangle however extends beyond the Borough boundaries as shown on the diagram below (Map 1). This indicates that North Warwickshire is not the only location that can deliver strategic employment, particularly logistics.



(Source: Warehousing and the Golden Logistics Triangle”, by Morgan King, (26 Feb 2024))

4 Policies

EP1: Amount of employment land (partial revision to LP5 NWLP 2021)

- 4.1 To determine in this “mini” review how much employment land to allocate there are a number of reports which provide an indication of the needs for employment land. These are:
- (a) North Warwickshire Economic Development Strategy;
 - (b) Coventry and Warwickshire Housing and Employment Development Needs Assessment (CW HEDNA);
 - (c) the West Midlands Strategic Employment Sites Study (WMSESS), and;
 - (d) the Draft North Warwickshire Employment Study.
- These are each considered in turn below.
- 4.2 As outlined above the NW Economic Strategy looks to continually diversify the work base within the Borough. It is an important lesson from the coal mining industry that the employment base does not rely solely on one segment of the employment sector. The impact on the local economy was very significant when the mines closed. The effect was also significantly felt by the local supply chain. The Borough Council whilst supporting the logistics industry seeks to ensure that there is a range of employment and no one sector dominates over the others. With the increase in automation, particularly in the logistics industry it is an important issue for the Borough² to ensure a diversity of employment opportunities.

² The Automation Impact by Localis (July 2018)

- 4.3 Within the Coventry & Warwickshire area a Housing and Employment Development Needs Assessment (HEDNA) was published in November 2022. It identified a need for 61.4 hectares of local employment land and a global figure of some 551 hectares across the Coventry and Warwickshire area for strategic needs up to 2041 and 88.4 hectares and 735 up to 2050.
- 4.4 In 2024, a West Midlands Strategic Employment Sites Study was carried out on behalf of a number of local authorities³ in the West Midlands including the West Midlands Combined Authority. It identified there is a need for a range of 548 - 841 ha of road served land and rail served need of 67-135 ha (accounting for existing supply) of land for strategic employment on sites over 25 hectares within the West Midlands and highlighted 7 opportunity areas. Opportunity area 5 M42 North Warwickshire is indicated to be in the general area from junction 10 to junction 9 of the M42. The reports makes it clear that these areas are not precise or delineated.
- 4.5 The WMSESS looked at the market for big boxes assessing where the market would like to deliver employment land on sites over 25 hectares. It is a study clearly from the market perspective. However, it does not consider the full impact of allocating a site for this type of development such as impacts on the landscape, road system, access to employment for North Warwickshire residents, as well as the impact on local residents. It important to understand the market as this will influence the potential deliverability of sites. Further information is provided in EP6 below.
- 4.6 The WMSESS only looked at 25+ hectare sites and did not look in detail at sites of less than 25 hectares which are also being capable of providing for big box developments. This means that sites can provide for local and strategic employment needs.
- 4.7 An alignment paper for Coventry and Warwickshire was prepared to pull the two sets of figures together as there were issues of consistency. The alignment paper indicated there was a residual need for 36 hectares of employment land in North Warwickshire along with a further contribution of between 50 to 100 hectares
- 4.8 Consultants have further looked at the amount of employment land the Borough Council should consider delivering up to 2045. They concluded this should be 42 hectares with the possibility of a further contribution of between 50 to 100 hectares.
- 4.9 The above studies use past trends as a way of predicting future employment land requirements. This does not take account of the major provision of employment land there has been delivered in a mainly rural Borough and which has led to many more jobs than economically active resident population.

³ The WMSESS was jointly funded by North Warwickshire, Wolverhampton, Dudley, Birmingham, WMCA, South Staffordshire County, South Staffordshire, Solihull, Shropshire, Rugby and Bromsgrove local authorities. Other authorities within the are provided evidence and support for the Study.

- 4.10 A Memorandum of Understanding has been agreed with the local authorities from the Coventry and Warwickshire area, highlighting a shortfall in provision of local employment land for Coventry City Council of some 45 hectares. Discussions are continuing and a separate Statement of Common Ground is being drafted between Coventry and North Warwickshire. There are no additional land requirements that the Borough must consider at the present time.
- 4.11 The amount of employment land that the Borough should seek to deliver is also influenced by the fact that there are more jobs than resident economically active population. The most recent data from 2023 indicates there are 1.36 jobs per economically active resident. The focus therefore for the Borough Council is not solely on adding more jobs to the amount already available. It is about making sure that if jobs are provided, they are targeted at the residents in the Borough, broadening the employment base and job types and opportunities, and to ensure that out commuting is reduced and those economically inactive become active. This continues the objective from both the Core Strategy and NWLP 2021 to diversify the economic base of the Borough.

EP1 Amount of Employment Development

Between 2024 and 2045 the Council will make provision for some 42 hectares of employment land.

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

EP2: Extension to Indurent Park, Kingsbury Road, Dordon

- 4.12 The Policies Map identifies Indurent Park (formerly known as St Modwens Tamworth Park) as an Employment Park, made up of 7 units, providing over 705,000 sq. ft. over two areas east and west of Kingsbury Road. It is proposed to extend the site to the east and south-east by some 39 hectares.
- 4.13 There is a high-pressured gas pipeline that runs through the site operated by Cadent. The Health and Safety Executive (HSE) is the primary body responsible for regulating the safety of high-pressure gas pipelines in the United Kingdom. The site can be developed with the pipeline in situ. An alternative option may be to move the pipeline to the east, but this may impact on the delivery of employment site allocation E2. Any movement of the pipeline will need to consider carefully the implications and ensure the delivery of both the proposed and existing allocations. Both, Cadent and HSE, would need to be involved in any changes to its route as it has implications on the number of employees who can be present on site. Any restrictions in terms of number of employees would be outside of the planning consent regime. It is not seen that this will be overly restrictive in terms of those who can occupy the site.

- 4.14 Different unit sizes could be provided on site and these could range from around 2,000 sq m (21,500 sq ft) to around 18,000 sq m (194,000 sq ft) in size.

EP2: Extension to Indurent Park, Kingsbury Road, Dordon (Site E5).

Some 39.43 gross hectares of land to the east and south of the existing Indurent Park, Kingsbury Road will be allocated as employment land within Use Classes B2/B8/Eg(iii) together with a minimum of a 200 metres buffer zone to the homes in the hamlet of Freasley.

The allocation will provide approximately 70,000 sq m / 750,000 sq ft (gross internal area) and is expected to deliver at least one unit of at least 9,290 sq. m (100,000 sq ft).

A buffer zone will be required to be retained /provided of at least 200 metres to homes in the hamlet of Freasley. Impact on the hamlet should be minimised, particularly, in terms of the height of buildings, lighting and noise from the proposed development.

The existing access from Kingsbury Road will be the primary access to the site. Development will be expected to contribute towards the cost of improvements to Junction 10 of the M42. Further highway improvements required as part of the development will be determined through a transport assessment.

The allocation of this land will provide for access to the adjoining employment allocation site E2 (NWLP 2021). A corridor to allow a link road through the allocation will be provided.

Active travel, particularly for cycling and walking, to the site will be required to be improved. The focus of any improvements will be to improve accessibility for existing and future Dordon and Polesworth residents.

An Employment and Skills Plan will be required to ensure North Warwickshire residents can benefit directly from the construction and occupation phases of the development.

EP3: Extension to Site E2 - Land to the west of Birch Coppice, Dordon

- 4.15 Some 5.1 hectares were allocated on Site E2, land to the west of Birch Coppice, for employment use as part of the NWLP 2021. Birch Coppice is one of the major distribution sites in North Warwickshire. It also has a rail freight interchange depot. Site E2 lies to the west of the access to Birch Coppice and lies partially fronting on to the A5. It is proposed to extend this site allocation by a minimum of 2.07 hectares to the west, but with the potential further by some 2.47 hectares depending on the advice from the HSE as to the type and extent of development. This policy to extend the site allows for greater flexibility in the use of the site.

- 4.16 The impact on the nearby homes will be an important consideration and any adverse impacts must be mitigated to minimise these impacts as far as possible. This will include height of the proposed buildings (including structures), overshadowing, lighting and noise.
- 4.17 Some 1.5 hectares of the allocation are currently used as allotments. These will need to be replaced subject to further consultation with alternative provision being provided at a more accessible location close to existing residential areas. The existing allotments must be replaced and relocated to the alternative location to the north of the A5, prior to any redevelopment proposal being granted. In association with employment proposals E2 and E3 land north of the A5 off Browns Lane's is considered a potential suitable location and is identified for their replacement and identified on the Policies Map for NWLP 2021 as site OS1.

EP3 Land to the west of Birch Coppice, Dordon

Some 2.07 hectares of additional land are allocated for employment purposes on land to the immediate west of Birch Coppice Business Park, south of the A5 at Dordon as an extension to employment site allocation E2 from the NWLP 2021, making an oversite of some 7.2 hectares.

Landscaping will be required along the A5 and to the residential properties on the A5.

The allotments, along with appropriate services and associated infrastructure, must be replaced and relocated to the alternative location to the north of the A5, identified as site OS1 on the policies map, prior to the start of construction.

Site OS1 - A Site to accommodate allotments/open space/recreation uses involving re-location from land south of A5 to land north of A5, to facilitate improved recreational provision and facilitating employment and/or mixed development opportunities especially on sites E2 and E3.

Access to the site can be provided through the adjoining Indurent Park site from Kingsbury Road, Site E5, as identified in policy EP2.

EP4 RE1 Reserve employment site – Birch Coppice Spoil Heap

- 4.18 Birch Coppice Spoil heap is the remains of the former Birch Coppice Colliery which closed in 1986. This is a major brownfield site located outside of the green belt in the A5 corridor directly adjacent to the Strategic Employment sites of Birch Coppice, Core 42 and Indurent Park. The spoil heap was originally envisaged to be a country park. However, the slopes are steep and unstable, and the material is not conducive to public access.
- 4.19 There is over 50,000 sq. m. of material within the spoil heap which will need to be removed. A suitable location would need to be found to relocate the material. Rail should be used as the preferred means of moving the material. This would

need to be agreed with the local minerals planning authority, Warwickshire County Council.

- 4.20 It is proposed to allocate the site as a reserve employment site recognising the challenges in bringing it forward but also setting out the Council's support to bring this site forward before the end of the Plan period.

EP4 RE1 Reserve Employment Site - Extension to Birch Coppice

Some 30 hectares of brownfield land to the west of the existing Birch Coppice Site using the site of the former Birch Coppice Colliery spoil heap will be allocated as reserve employment land within Use Classes B2/B8/Eg(iii) subject to its viability.

To assist in determining the viability of the delivery of the site an assessment will be carried out to assess the feasibility of removing the spoil heap and the exact amount of land that can be provided as an extension to the regionally significant employment site of Birch Coppice.

Additional land may be considered to the southwest of the site subject to joint access arrangements and a buffer zone to Freasley. This can be investigated further and may help with viability of the site overall.

EP5 Delivery of Coleshill Manor

- 4.21 Planning permission was originally granted in 1991 (OAP/1991/0130) for conversion and new office accommodation at the former Coleshill Hospital, known as Coleshill Manor on some 16.3 hectares (gross) of land within the Green Belt. The permission allowed for the construction of up to 107,994 sq ft (10033 sq.m). The indicative master plan from the 1999 planning permission showed 7 buildings in addition to the conversion of the manor house which had previously been used as a hospital.
- 4.22 Some parts of the original permission have been implemented therefore extant planning permission remains for the site. However, since 2010 the site has been under threat by the construction of the Birmingham section of HS2, part of the delta junction.
- 4.23 The NWLP 2021 recognised this issue and indicated the Borough Council would consider favourably applications for replacement buildings if they were to be demolished due to HS2. In early 2025 a relatively new office block was demolished to make way for HS2.
- 4.24 In addition, the exact location of the other proposed office blocks as shown on the indicative master plan submitted with the 1995 planning application will also be impacted by the route of the HS2 railway. It is considered important for the Borough Council to signal that although HS2 has carved through part of the site that alternative solutions for the site should be explored.

EP5 Coleshill Manor

The Borough Council will look favorably on proposals at Coleshill Manor to replace buildings demolished, including those that have permission but are not able to be developed, due to the construction of HS2.

Any development should respect its Green Belt status and parkland setting. Buildings should be no taller than a 2-storey house.

Lighting should be kept to a minimum with footpaths, parking and access roads lit at a low level.

Any signage should be no higher than a single storey house and externally illuminated to reduce its impact on the surrounding area.

EP6 Further Employment Land

- 4.25 As part of the 2021 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 come forward in the absence of any indication of the amount of land that should be allocated. NWLP Policy LP6 talks about significant weight being given to proposals supporting economic growth and productivity where evidence demonstrates an immediate need.
- 4.26 The 2015 West Midlands Strategic Employment Sites 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.
- 4.27 Since the 2015 Strategic Employment Sites Study prepared by PBA and JLL a further study was commissioned in 2021. This report 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 was commissioned by 25 organisations across the West Midlands, including North Warwickshire BC. This is known as the West Midlands Strategic Employment Sites Study (WMSESS). This Study was published in 2024. The study looked 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.

- 4.28 Priority Area 5 encompasses land covered by the Strategic Gap, designated Green Belt, and land which is not in categories 1, 2, 3 or 4 of NWLP policy LP2. Priority Area 7 includes land along the M6 / A45 / M45 / A46 Coventry / Rugby. This evidence 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.
- 4.29 Demonstrating whether a site can deliver for an immediate need is an important part of the assessment. It will be important for the Borough Council to know who the occupier and how quickly they intend to occupy the premises. It will be important to provide evidence and demonstrate the clear need for the business to be located within the identified area or specific site. In terms of the site it will need to be demonstrated, and robust evidence provided as why this is the only site within the East or West Midlands where this particular occupier could be located. If a site is going to be released outside of an allocation process then it must be understood that this is a very high bar to pass.

Policy EP6 Additional Employment (formerly LP6 NWLP 2021)

Proposals for employment development (offices, industrial, storage /distribution) within the existing employment areas will be supported subject to Policy LP 2 of the NWLP 2021.

Proposals for employment development outside the Existing Employment areas and within development boundaries will be supported where these do not have an unacceptable adverse impact on the amenities of any nearby residential properties or the wider environment and the local highway network.

Exceptionally, to provide the degree of flexibility required by the NPPF, proposals for employment development on unidentified land outside of the development boundaries will be supported where the following criteria are met:

- a) it is demonstrated to the satisfaction of the Council that there is:
 - . (i) an immediate requirement for the employment land of the type proposed in North Warwickshire; and,
 - . (ii) either the development will be occupied by named end user/s and this will be secured by Section 106 legal as appropriate; or the development is required for the reasons set out in the NPPF para 82c (or its replacement), namely it is to accommodate needs not anticipated in this plan,

AND

- (b) it is demonstrated to the satisfaction of the Council that the immediate requirement cannot be met on any of the following within the search area of West and East Midlands area:
 - . (i) previous developed land;
 - . (ii) an existing employment area as identified in the plan or NWLP 2021; or

- . (iii) land allocated for employment development in the Local Plan; or,
- . (iv) on land with planning permission for employment development. .

AND

The development is in an appropriate location and:

- (i) is accessible to the Market Towns within the Borough (where the larger populations reside) or will be made accessible by a choice of means of transport, including sustainable transport modes, as a consequence of planning permission being granted for the development; and
- (ii) has direct access to the strategic highway network and an acceptable impact on the capacity of that network, including any junctions; and
- (iii) will not be detrimental to the wider environment or the amenities of any nearby residential properties as a result of loss of privacy, overshadowing or an overbearing impact, activity levels, noise, vibration, pollution, odours or lighting.
- (iv) a detailed master plan of the site will be agreed prior to planning permission is approved, which will include location of buildings and parking, colours of buildings, lighting and advertisements (including their position and illumination on buildings).

EP7 Lorry Parking

4.30 The National Planning Policy Framework (NPPF) 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. In addition, the government's policy indicates 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.

4.31 The Department of Transport (DoT) has updated the 2017 National Lorry Parking Survey to ensure strong evidence is available on the national picture in future. The A5 Partnership, which the Borough Council is a partner of, 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. This is also an issue around Hams Hall and other locations within the Borough.

Local situation

4.32 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.

- 4.33 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).
- 4.34 Capacity at nearby motorway service stations (MSA's) at the M6 Corley Services, has 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' 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. Much of this increase in capacity will particularly serve through motorway traffic.
- 4.35 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),
- 4.36 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.

- 4.37 Another issue relating to the lorry parking relates to availability of associated services and facilities. Welfare facilities and services are an integral provision for main lorry parking sites 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.
- 4.38 Onsite provision for specific operators/businesses above an identified threshold (size/area/number of parking spaces and type of commercial operation on site) is being proposed along with 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 tachograph issues reduce the ability and distance drivers can travel to main lorry parking sites/facilities,

- 4.39 There is potential for a further 2.43 hectares for lorry parking north of the existing MOTO Motorway Service Area providing for around a further 150 lorries, along with a noise barrier and planting to the homes in Green Lane, Birchmoor. The land lies within the HS2 Safeguarded Area for the proposed eastern leg of the route. This railway line is now no longer going ahead but the safeguarded route in North Warwickshire remains. A decision is awaited from Government as to when the safeguarded area in North Warwickshire will be removed. It is considered that the provision of hardstanding and appropriate lighting is not a sufficient deterrent in the future provision of the railway and so can be a productive use of the site up to that point. To avoid glare to neighbouring homes and to the M42 motorway all lighting will be at ground level or no higher than 2 metres from the ground. A noise barrier and substantial planting will be required to shield the homes on Green Land Birchmoor from the activity at a 24/7 lorry park.
- 4.40 Security of the freight is an issue identified in the DfT National surveys of lorry parking (2017, 2019 and 2022) as well as the National Highways Lorry Parking Assessments (September 2023). New lorry parking sites will require security as an integral part of the proposal to minimise this risk.

EP7: Lorry Park facilities and services

Dedicated Lorry parking to cater for the safe and timely delivery of goods in and out of sites will be expected to be provided on all sites. These will include welfare facilities as appropriate for both short and long driver breaks and security.

Expansion of existing authorised lorry parking facilities will be supported where it can be successfully assimilated into the local environment and have no adverse impacts.

New lorry parking facilities will be expected to provide the following:

- A small-scale ancillary amenity building providing unisex shower and toilet facilities and be maintained and available for use every day of the year;
- Monitored CCTV;
- Lighting to be no higher than the height of a single decker lorry, be focussed on the internal area of the site; and,
- An internal layout that allows for all vehicles to enter and leave the site in a forward gear.

In all cases the lorry parking is expected to have no adverse impact on:

- 1 the local and strategic road network;
- 2 residential properties, particularly in terms of noise, lighting, and general disturbance both internally and externally; and,
- 3 the landscape character of the area, especially but not exclusively the effect of lighting in an otherwise dark area.

Reserve Site

Some 2.43 hectares are reserve for lorry parking to the north of the motorway service area at junction 10 of the M42. The site will require the provision of a noise barrier to the homes in Green Lane, Birchmoor as well as substantial screen planting. All lighting will be no higher than 2m from ground level and directed completely within the site.

5 Monitoring

5.1 Monitoring of this Employment Plan is a central component of ensuring that the Plan delivers.

Policy	Title	Indicator/ metrics	Target
EP1	Amount of development	Employment land delivered by Use Class and by hectare and square metre.	i. Minimum of 100 hectares of employment land delivered to 2033 in line with the employment land trajectory in Local Plan appendix B ii. Provision of adequate infrastructure to support development requirements
EP2	Extension to Indurent Park, Kingsbury Road, Dordon	Employment land delivered by Use Class and by hectare and square metre.	i) Delivery of site
EP3	Land to the west of Birch Coppice, Dordon	Employment land delivered by Use Class and by hectare and square metre.	i) Delivery of site
EP4	RE1 Reserve Employment Site - Extension to Birch Coppice	Report latest situation	Feasibility study being carried out
EP5	Delivery of Coleshill Manor	Employment land delivered by Use Class and by hectare and square metre.	i) Delivery of site
EP6	Additional Employment (formerly LP6 NWLP 2021)	Report latest situation	Report any use of policy
EP7	Lorry Parking	Report latest situation	Number of spaces provided

6 Appendices

Appendix A

Table indicating which policies from the adopted North Warwickshire Local Plan and remain in force and which policies this Plan replaces or amends.

Policy No		
LP1	Sustainable Development	No change - remains in force
LP2	Settlement Hierarchy	No change - remains in force
LP3	Green Belt	No change - remains in force
LP4	Strategic Gap	No change - remains in force
LP5	Amount of development	Amends policy in relation to amount of employment land
LP6	Additional Employment Land	Will replace NWLP LP6 when EP is adopted
LP7	Housing Development	No change - remains in force
LP8	Windfall	No change - remains in force
LP9	Affordable Housing Provision	No change - remains in force
LP10	Gypsy & Travellers	No change - remains in force
LP11	Economic Regeneration	No change - remains in force
LP12	Employment Areas	No change - remains in force
LP13	Rural Employment	No change - remains in force
LP14	Landscape	No change - remains in force
LP15	Historic Environment	No change - remains in force
LP16	Natural Environment	No change - remains in force
LP17	Green infrastructure	No change - remains in force
LP18	Tame Valley Wetlands Nature Improvement Area (NIA) including Kingsbury Water Park	No change - remains in force
LP19	Local Nature Reserves	No change - remains in force
LP20	Green Spaces	No change - remains in force
LP21	Services and Facilities	No change - remains in force
LP22	Recreational Provision	No change - remains in force
LP23	Transport Assessment and Travel Plans	No change - remains in force
LP24	Stations	No change - remains in force
LP25	Railway lines	No change - remains in force
LP26	Strategic Road Improvements	No change - remains in force
LP27	Walking and Cycling	No change - remains in force
LP28	Level Crossings	No change - remains in force
LP29	Development Considerations	No change - remains in force
LP30	Built Form	No change - remains in force
LP31	Frontages, Signage & External Installations	No change - remains in force
LP32	New Agricultural & Equestrian Buildings	No change - remains in force
LP33	Water Management	No change - remains in force
LP34	Parking	Partly amends in relation to lorry parking
LP35	Renewable Energy & Energy Efficiency	No change - remains in force

*DRAFT Employment Plan
Regulation 19*

LP36	Information and Communication Technologies	No change - remains in force
LP37	Housing Allocations - Sites H1 to H17	No change - remains in force
LP38	Reserve Housing sites	No change - remains in force
LP39	Employment Allocations - Sites E1 to E4	Updated
Various	Specific Site Policies by Settlement	Partly updated

Agenda Item No 8

Local Development Framework Sub-Committee

1 July 2025

Report of the Chief Executive

Review of North Warwickshire Local Plan 2021

1 Summary

- 1.1 This report reviews the current adopted Local Plan 2021 and recommending the policies which should be the focus for the Issues and Options, Regulation 18 stage.

Recommendation to the Sub-Committee

- a That Members support the policies recommended to be the focus of an Issues and Options Regulation 18 paper; and
- b To consider at the next meeting an Issues and Options document 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 Introduction

- 3.1 The North Warwickshire Local Plan was adopted in September 2021. Although it was agreed previously at Full Council, the LDF Sub-Committee in February formally agreed to include the review of the Local Plan within the Local Development Scheme (LDS).

4 The Review

- 4.1 The first stage of the review is looking at the existing adopted policies and assessing whether they need to be modified. Attached as **Appendix 1** is a report going through the adopted Local Plan determining if the policy needs to be part of the review process or whether it can continue with no changes. The Planning Policy Guidance (PPG) explains that "*Policies age at different rates according to local circumstances and a plan does not become out-of-date automatically after 5 years. The review process is a method to ensure that a plan and the policies within remains effective.*" (source: PPG Paragraph: 064 Reference ID: 61-064-20190315)

4.2 Guidance on how to prepare such a report is provided in the Planning Policy Guidance (PPG) which accompanies the National Planning Policy Framework (NPPF). The Borough Council can consider information such as the following (but not exclusively) when determining whether a plan or policies within a plan should be updated:

- conformity with national planning policy;
- changes to local circumstances, such as a change in Local Housing Need;
- their Housing Delivery Test performance;
- whether the authority can demonstrate a 5 year supply of deliverable sites for housing;
- whether issues have arisen that may impact on the deliverability of key site allocations;
- their appeals performance;
- success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report;
- the impact of changes to higher tier plans;
- plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need;
- significant economic changes that may impact on viability.; and
- whether any new social, environmental or economic priorities may have arisen.

(source PPG, Paragraph: 065 Reference ID: 61-065-20190723)

The report attached as **Appendix 1** follows this process. The PPG also states that the review should be proportional to the issues that need to be addressed.

4.3 In Table 1 is a summary of the outcome of this report. It indicates which policies require some changes, policies which may require minor tweaks and those where it is not envisaged to make any changes.

Table 1: Summary Table of Policy Assessment against the NPPF and any other changes

(This is the same as Table 5 in the attached report)

Significant changes required (0)		Requires significant changes to reflect updated national policy.
Modifications required (3)	LP3 Green Belt – introduction of grey belt to the overall Green Belt may involve changes to the Policies Map and some change to policy wording LP5 Amount of development – numbers need to be updated LP35 Renewable Energy & Energy Efficiency	Broadly compliant with national policy but require some updating.
Would benefit from minor alterations (17)	LP2 Settlement Hierarchy LP4 Strategic Gap LP6 Additional Employment Land LP7 Housing Development LP8 Windfall	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need

	LP9 Affordable Housing Provision LP12 Employment Areas LP14 Landscape LP15 Historic Environment LP16 Natural Environment LP17 Green infrastructure LP26 Strategic Road Improvements LP33 Water Management LP34 Parking LP37 Housing Allocations - Sites H1 to H17 LP38 Reserve Housing sites LP39 Employment Allocations - Sites E1 to E4 Various Specific Site Policies by Settlement E1 to E4	to revise the evidence base.
No changes required (19)	LP1 Sustainable Development LP10 Gypsy & Travellers LP11 Economic Regeneration LP13 Rural Employment LP18 Tame Valley Wetlands Nature Improvement Area (NIA) including Kingsbury Water Park LP19 Local Nature Reserves LP20 Green Spaces LP21 Services and Facilities LP22 Recreational Provision LP23 Transport Assessment and Travel Plans LP24 Stations LP25 Railway lines LP27 Walking and Cycling LP28 Level Crossings LP29 Development Considerations LP30 Built Form LP31 Frontages, Signage & External Installations LP32 New Agricultural & Equestrian Buildings LP36 Information and Communication Technologies	No changes required. (Apart from minor update or reference to other policies subsequently changing or updating)

5 Next Steps

- 5.1 Subject to Members' approval the policies where some changes are envisaged will be part of an Issues and Options paper. This will set out the issues that need to be addressed and the possible options.
- 5.2 In addition, it is proposed to prepare a version of the adopted Local Plan with track changes showing potential new wording or the various options. This will hopefully make it easier to understand what is being changed and where that possible change will be within the Local Plan.

- 5.3 The aim is to bring the Issue and Options paper along with the track change Local Plan back to the LDF Sub-committee at the September meeting. If this is achieved consultation would then take place for 6 weeks from late September / early October 2025.

6 Report Implications

6.1 Finance and Value for Money Implications

- 6.1.1 The costs of the Local Plan Review will be taken from the Local Plan Budget.

6.2 Legal, Data Protection and Human Rights Implications

- 6.2.1 The process for reviewing a local plan is set out in legislation and regulations, as well as the NPPF and planning policy guidance. A key requirement is a local plan is reviewed within 5 years of its adoption. The five years for the adopted Local Plan is September 2026. The aim is therefore to progress the Local Plan Review as swiftly as possible to ensure a reviewed plan is adopted or on its way to being adopted before the expiry of the five years.

6.3 Environment, Sustainability and Health Implications

- 6.3.1 A key part of the local plan process is to ensure that the plan is as sustainable as possible. This means it considers the environmental and social, including health, effects of the policies and proposals. Currently the system is to prepare a Sustainability Appraisal and that will be a key part of the Local Plan Review as long as the Plan is submitted for Examination before December 2026. After this time plans will require Environmental Outcomes Reports.

6.4 Human Resources Implications

- 6.4.1 A review of a Local Plan is resource hungry, especially in terms of staff time. From gathering evidence to writing the plan to consultations it requires the majority of hours available within the team.

6.5 Risk Management Implications

- 6.5.1 The following are potential risks to delivering the Local Plan Review:
- 1 The main risk is evidence not being prepared on time. This risk will be minimised by keeping a close eye on progress of the reports.
 - 2 Further changes to the NPPF which require further evidence. This risk will be minimised by keeping abreast of any expected changes to the NPPF but may be unavoidable.

6.6 Links to Council's Priorities

- 6.6.1 The local plan impacts all of the Council's priorities.

The Contact Officer for this report is Dorothy Barratt (01827 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

DRAFT

Review of the North Warwickshire Local Plan 2021



North Warwickshire
Borough Council

July 2025

Executive summary

The North Warwickshire Local Plan was adopted in 2021 and runs to 2033. Legislation introduced in 2018 requires local development documents to be reviewed every five years starting from the date of adoption, meaning a review of the Local Plan would need to be completed by September 2026 in order to comply with the legislation. Since the adoption of the Plan however, updates to national planning policy and a change in priorities at a local level mean that now is an appropriate time to review the Plan.

The review follows national Planning Practice Guidance (PPG) advice in establishing whether the Plan remains in compliance with national policy and how the policies are performing against targets in the monitoring framework. Each of the policies is rated red, amber, yellow or green based on the extent of any changes required. The review finds that 0 (zero) policies require significant update or changes, 20 require some form of modification or minor alteration and 19 do not require any changes. The site-specific policies H1 to H17, E1 to E4 will require changes to reflect where sites have been completed or started. It is therefore concluded that the level of changes require a partial update to the existing Plan.

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1 Introduction

- 1.1 The North Warwickshire Local Plan 2021 (“the Plan”) was adopted by Full Council on the 29th September 2021. The Plan forms part of the Council’s statutory development plan and sets the overall spatial strategy for the borough of North Warwickshire for the period 2019 to 2033 (commonly referred to as the “plan period”). Just under half of the plan period has elapsed so far.
- 1.2 As described in Chapters 2, 3 and 4 of the Plan, the document contains a spatial portrait and vision for the Borough, setting out key characteristics of the area and identifies the strategic issues and challenges the Plan seeks to address. The vision results in a set of 9 priorities. Following on from the vision and strategic spatial priorities a series of policy chapters set out how the spatial vision and priorities will be achieved in practical terms:
- Chapter 6 Sustainable Development
 - Chapter 7 Spatial Strategy
 - Chapter 8 Housing
 - Chapter 9 Employment
 - Chapter 10: Environment
 - Chapter 11: Services and Facilities
 - Chapter 12 Transport
 - Chapter 13 Development Considerations
 - Chapter 14 Allocations
- 1.3 Chapter 15 refers to monitoring. There have been three Annual Monitoring Reports since 2021 looking to assess the policies and how well they are working. This is an important element of helping to evaluate the effectiveness of the policies and aid the discussion of whether a policy needs to remain unchanged, be updated or deleted.
- 1.4 The Plan was prepared in accordance with relevant legislation (as confirmed in the Local Plan Inspector’s report) and was therefore found to be legally compliant. The Plan was also deemed “sound” subject to a number of main modifications, when assessed against national policy which was in force at the time of the examination (the 2012 National Planning Policy Framework). The Local Plan Inspector explained however: *“Nonetheless the NPPF2019 has applied in decisions-taking since its publication and cannot therefore be set aside entirely. Consequently, in so far as necessary and proportionate, the implications of the NPPF2019 were considered during the examination.”* (Source: Local Plan Inspector’s Report on NWLP 21, July 2021)

2 Legislation, policy and guidance governing plan reviews

- 2.1 As a result of an amendment to the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which came into force on 6 April 2018, local planning authorities are now required to review local development documents within specified time periods. In respect of a local plan

Regulation 10A (1)(a)¹ requires that a review must be completed every five years, starting with the date of adoption. This means that a review of the Plan must be completed by 28th September 2025 in order to comply with the statutory obligations.

2.2 The requirement to review local plans at least every five years is also contained in the National Planning Policy Framework (NPPF) 2024, notably paragraphs 32 to 34. This advises that:

- Policies in local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary.
- Reviews should be completed no later than five years from the adoption date of the plan and should take into account changing circumstances affecting the area or any relevant changes in national policy
- The preparation and review of all policies should be underpinned by relevant and up to date evidence.

2.3 It is important to note that a plan “does not become out-of-date automatically after 5 years”² and that there is a clear distinction between, a review of a plan, and an update or modification to it. The regulations require a review but whether, having conducted the review, an update is required, is a matter of judgment for the Council. The NPPF makes this distinction clear by confirming that “policies in local plans should be reviewed to assess whether they need updating”³, demonstrating that a new or updated plan might not always be required. It is also clear that the purpose of a review is not to continually change the strategic decisions and direction of growth in the borough, which would undermine the clear intention in the NPPF for strategic policies to “anticipate and respond to long-term requirements and opportunities”⁴. The guidance sets out that a local planning authority should complete the review and decide either:

- That their policies do not need updating and publish their reasons for this decision; or
- That one or more policies do need updating and update their Local Development Scheme to set out the timetable for this revision.

3 Format of the review

3.1 There is no prescribed format for a review; however, there is guidance within the PPG as to how they should be undertaken. The PPG advises, “the review process is a method to ensure that a plan and the policies within remains effective”⁵. It is therefore clear that a fundamental part of the review process should be to assess whether, based on the evidence, the plan continues to be effective in delivering upon the objectives set out.

¹ Specifically Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

² Paragraph 064 Planning Practice Guidance

³ Paragraph 34, National Planning Policy Framework 2019

⁴ Paragraph 22 National Planning Policy Framework 2019

⁵

3.2 PPG also provides guidance as to the range of information and factors which local planning authorities can consider when undertaking a review, including but not exclusively⁶:

- conformity with national planning policy;
- changes to local circumstances; such as a change in Local Housing Need;
- their Housing Delivery Test performance;
- whether the authority can demonstrate a 5 year supply of deliverable sites for housing;
- whether issues have arisen that may impact on the deliverability of key site allocations;
- their appeals performance;
- success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report;
- the impact of changes to higher tier plans;
- plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need;
- significant economic changes that may impact on viability.; and
- whether any new social, environmental or economic priorities may have arisen.

These factors have been used as the basis for the review of the Local Plan and each is considered in more detail below.

4 Conformity with National Planning Policy

4.1 Since the adoption of the Local Plan, the Government has published revisions to the NPPF in 2019, 2023 and 2024. Further changes are expected including the introduction of the NPPF Development Management Policy document in 2025/26. Although the Local Plan 2021 was written with the NPPF 2012 but “...in so far as necessary and proportionate, the implications of the NPPF 2019 were considered during the examination.” (Source: paragraph 8, Report by Local Plan Inspector on North Warwickshire Local Plan, 20 July 2021)

- Introduction of a standard methodology for calculating local housing need, replacing the old approach of “objectively assessed needs”
- Expectation for at least 10% of housing to be accommodated on small/medium sized sites (up to 1 hectare)
- Expectation for at least 10% of housing on major developments to be available for affordable home ownership, except in specific circumstances
- Changes to the calculation of five-year supply for strategic policies over five years old and to reflect the introduction of the Housing Delivery Test
- Greater encouragement for diversification of town centres to respond to changes in the retail and leisure industry.
- Strengthened focus on making as much use as possible of brownfield and previously developed land and for making efficient use of land by maximising densities, particularly in areas where there is an anticipated shortage in land to meet identified housing needs. This includes maximising densities in town centres and considering use of minimum density standards.
- Renewed focus on design quality to achieve well-designed places
- Introduction of the concept of Grey Belt in the Green Belt.

⁶ Paragraph 065 Planning Practice Guidance

- Continued protection of the Green Belt, along with a clear expectation that all other reasonable options for meeting development needs must be examined before concluding that exceptional circumstances exist to justify changes to the Green Belt.
 - Changes to protections on habitats and biodiversity, including strengthening of protections of irreplaceable habitats (including ancient woodland) and clarity over the approach to developments which may impact upon sites protected under the Conservation of Habitats and Species Regulations 2017
- 4.2 An assessment of the impact on the Local Plan policies is included later in this document section 16.
- 4.3 It should also be noted that, since the Local Plan was adopted, wider planning reforms have also taken place, particularly in relation to expansion and liberalisation of permitted development rights to support housing delivery, and diversification and vitality of town centres and other retail areas. This includes making permanent office to residential permitted development rights, and additional rights relating to changes of use of retail premises.

5 Changes to in Local Circumstances

- 5.1 In 2019 the Government introduced a new standard methodology for calculating local housing need. The standard method takes a baseline household growth projection (for a ten-year period, converted into an annual housing need), which is then adjusted for affordability at a district level. If the calculated need using the standard methodology is greater than the need in the adopted local plan (if adopted within the past 5 years) any increase is capped to 40% above the previously assessed need.
- 5.2 A significant change in local housing need from that specified in the Local Plan may necessitate a change to one or more policies to ensure that the need is able to be met. For North Warwickshire the housing need calculated with the standard methodology is 364 dwellings per annum. The current adopted Local Plan objectively assessed need was calculated at 237 dwellings per annum, which included 914 dwellings to be delivered for Tamworth Borough Council as part of the uplift for economic growth with an additional 217 dwellings per annum to be delivered for adjoining neighbours (Birmingham and Coventry) (see table 1 in Adopted Local Plan). The Local Plan has a stepped trajectory as follows:

Table 1: Local Plan Stepped Housing Trajectory

Years covered	Dwellings per annum (dpa)	Total per period
2011-16	203	1015
2016-24	265	2120
2024-25	390	390
2025-26	700	700
2026-27	725	725

2027-33	775	4650
	Total	9625

- 5.3 The standard method provides a minimum target and local planning authorities can plan for growth. The existing Local Plan target if annualised over the plan period would equal 481 dpa. This is higher than the need as calculated using the standard method, which is 364 dpa.

6 Housing Delivery Test performance

- 6.1 In 2018 the Government published the Housing Delivery Test Measurement (HDT) Rule Book 6 with the expectation that planning authorities would deliver 95% or more of their annual housing requirement in the previous 3 years. (For example: if the annual housing target was 200 dwellings to be completed each year, then it would be expected that 95% of the expected 600 units should have been delivered, i.e. there would be at least 570 completed dwellings). The Housing Delivery Test is a percentage measurement of the net number of homes delivered against the number of homes required for the area over a rolling three-year period.
- 6.2 The Borough Council's published HDT measurement has been 140% in 2020, 133% in 2021, 80% in 2022 and 81% in 2023. However, the figures for the last two years are incorrect as there is a mistake in the 2021/22 year which has been carried through. The main issue is that for 2021/22 the number of net completions should have been 374 dwellings and not 200. Using the corrected figures, including correcting the housing requirement figure, the amended 2023 HDT for the Borough is shown in Table 3. This indicates delivery for the published period to 2023 is 98%. MHCLG has been made aware of this issue.

Table 2: Published Housing Delivery Test

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2023 measurement
2020-21	2021-22	2022-23		2020-21	2021-22	2022-23		
158	235	242	635	154	200	162	516	81%

Table 3: Corrected Housing Delivery Test

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2023 measurement
2020-21	2021-22	2022-23		2020-21	2021-22	2022-23		
177	265	265	707	154	374	164	692	98%

- 6.3 MHCLG has responded to the Borough Council explaining how the homes required has been derived. Unfortunately, as the corrected figure is more than 1 year old, the figure in the published will not be altered. However, the advice has been to amend the housing flow reconciliation figure to be submitted in 2025 for the 24/25 monitoring year by adding on the missing 174 units.

7 Five-year supply of deliverable sites for housing

- 7.1 Paragraph 78 of the NPPF states that local planning authorities should 'identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old' (the five-year housing land supply).
- 7.2 The importance of the five-year housing land supply is underlined by paragraph 11 and footnote 7 of the NPPF which states that the presumption in favour of sustainable development applies where the relevant development plan policies are out of date, and this includes where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. As of April 2024, the supply of housing land in North Warwickshire was 5.1 years. More information can be found on the monitoring pages of the Council's website at <https://www.northwarks.gov.uk/forward-planning/annual-monitoring-report>.

8 Deliverability of key site allocations

- 8.1 The delivery of the site allocations is shown in the AMR. This has been further updated below:

Table 4: Update on Housing Allocations

Site Ref	Location	Area (ha)	Total Number of units	With PP	Under construction	Completed	Latest Situation
H1	Land at Holly Lane Atherstone	32.7	620	123	15	50	Detailed planning application approved for 123 dwellings and is under construction. 50 completed, 15 under construction. Outline planning application approved for an additional 499 dwellings. Total number for the whole site including the above approved for 620 dwellings. Phase 2 now submitted (PAP/2024/0349) for 250 dwellings
H2	Land to north-west of Atherstone off Whittington Lane	71.2	1282	0	0	0	Master planning underway with Council, highway improvements scheduled 2025 following part consent on adjoining site (same ownership). Initial onsite works to begin 2026/27.
H3	Allotments adjacent to	1.4	30	0	0	0	Initial design layout undertaken. Site in public ownership, possible schemes

	Memorial Park, Coleshill						under discussion. Expected application 2025 to 2028. Possible schemes discussed but no further progress
H4	Land to east of Polesworth and Dordon	160.8	1675	31	0	31	Master planning underway with Council. Trunk Road highway improvements design underway, scheduled 2026/27. 31 completed
H5	Land west of Robey's Lane, adjacent Tamworth	66.1	1270	0	0	0	Planning application has been approved subject to a S106.
H6	Site at Lindridge Road adj. Langley SUE, Wishaw	6.7	141	0	50	71	Planning permission now granted for recent application. (PAP/2022/0371 for 178 dwellings). Work started 2024/25 by Taylor Wimpey. 71 completed, 50 under construction
H7	Land at Church Farm, Baddesley	2.2	47	0	0	0	Planning application has been granted 2024/25_subject to S106.
H8	Land north of Grendon Community Hall (former Youth Centre) Boot Hill Grendon	0.3	7	0	0	0	County Council site. Discussions on potential application held. Delivery not expected till late 2026/27 or later.
H9	Land between Church Rd and Nuneaton Rd, Hartshill	30.4	400	0	0	0	Planning application PAP/2018/0140 recommended approval at Board but currently pending outcome of appeal on highway grounds on land outside Borough boundary (adjoining Borough refused the access junction). Early start expected once appeal outcome released. Site is allocated within Neighbourhood Plan also and the County Highway Authority has not objected to the highway arrangements.
H10	Land south of Coleshill Road, Ansley Common	17.2	450	0	0	0	PAP/2024/0528 submitted for 62 dwellings and pending.
H11	Former School redevelopment site (excluding original historic school building) Water Orton	2.8	48	48	0	0	Brownfield site. Planning Application now submitted (PAP/2023/0266). Decision pending S106 negotiations. Potential start 2025.
H12	Land at Village Farm, Birmingham Road	0.6	12	0	8	0	Planning permission granted and 8 out of the 9 houses are under construction
H14	Land north east of Manor Farm Buildings Main Road, Newton Regis	1.0	24	24	0	24	Site completed PAP/2022/0539
H15	Land south of Shuttington Village Hall	1.2	24	24	0	0	Planning permission granted - PAP/2019/0022

H16	Land north of Orton Rd	4.2	128	128	10	51	Planning permission granted and under construction - PAP/2022/0282 51 completed, 10 under construction
H17	Land south of Islington Farm, r/o 115 Tamworth Rd	1.3	26	28	0	28	Site completed - PAP/2020/0420
	Total Allocations		6183	406	83	255	

9 Appeals Performance

- 9.1 The Annual monitoring reports provide indications of policy performance on appeals. Where policies have been successfully used to defend planning decisions these are highlighted, as are circumstances where appeals are allowed that indicate where policy review may be necessary/required.

10 Strategic policies need to look ahead for minimum of 15 years

- 10.1 The NPPF paragraph 22 states “Strategic Policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.” The current Local Plan runs until 2033. Should it be concluded through the review process that strategic policies need amending then the plan end date would be required to be extended to ensure that, at adoption, the policies cover a minimum 15-year period.

11 Annual Monitoring Reports

- 11.1 Since the adoption of the Local Plan in 2021 the Borough Council has prepared an Annual Monitoring Report (AMR). This has looked at each policy and where information is available provides some commentary as to what has happened in relation to the policy. This assists in determining the success of the policies, as considered against the monitoring indicators set out in Chapter 15 of the adopted Local Plan and is set out later in the document.

12 Higher Tier Plans

- 12.1 The latest NPPF talks about Strategic Development Strategies (SDS) which it explains are “*A plan containing strategic policies prepared by a Mayor or a combined authority*”⁷. There is currently no SDS covering North Warwickshire. At the present time it is unclear who would produce a SDS covering the Borough. North Warwickshire is a non-constituent member of the West Midlands Combined Authority. Local Government Reorganisation may in time make this clearer.

⁷ NPPF 2024 Glossary

13 Plan-making activity by other authorities

- 13.1 Through the current adopted Local Plan North Warwickshire provides for the needs of neighbouring local authorities. This was agreed in three statements of common ground. The first was with Tamworth BC, the second with Birmingham City Council and the third with the Coventry and Warwickshire local authorities. The Borough Council had already delivered 6.5 hectares of employment land for Tamworth by the time of the adoption of the Local Plan 2021. The adopted Local Plan therefore looked to deliver homes for Birmingham with Tamworth (both fall within the Greater Birmingham Housing Market Area) and Coventry.
- 13.2 The Greater Birmingham Housing Market Area (GBHMA) had a significant shortfall of dwellings, with the majority arising from Birmingham's unmet need of 37,540. The Local Plan looked to deliver 10% of this shortfall as a result of the travel to work relationship with the city. Since this time the Strategic Growth Study by GL Hearn in 2018 put the shortfall at 28,150 and the most recent HMA position statement saw the estimated shortfall further reduced to 10,696. However, this number does not fully take account of any shortfall arising from the Black Country authorities. As they lie to the west of Birmingham there is considered to be no functional relationship to the Black Country with North Warwickshire.
- 13.3 A number of local authorities around the Borough are progressing new Local Plans. A summary is provided in Appendix A.

14 Economic changes

- 14.1 There are economic changes that may impact on viability, including post pandemic changes, inflation and changes in interest rates. The recent HEDNA indicated that the economy in North Warwickshire is expected to grow by 0.8% per annum (GVA growth pa) between 2022 and 2040, although the total number of jobs growth forecast is -1,900 which equates to an annual growth rate of -0.3%. This is broadly in line with national forecasts which show a slower level of growth compared to the previous business cycle.
- 14.2 The Borough continues to have more jobs than resident population. This means it is a mass importer of people travelling into the Borough to work. This indicates that for the Borough residents it is not necessarily the availability of work but the quality and whether our residents have the right skills to take up the opportunities of higher skilled jobs that are now becoming part of industry.
- 14.2 The Whole Plan Viability, Affordable Housing and CIL Study that supported the adoption of the current Local Plan suggested that most residential development would be viable but schemes of one and two dwellings would be marginal in terms of viability. The report also indicated that most speculative non-residential development would struggle to achieve viability (with the exception of out of centre retail) and that most development would come forward as a result of the needs of specific users. This assessment of viability will need to be reviewed and updated to reflect increases in costs especially in the cost of infrastructure.

15 Social, environmental or economic priority changes

- 15.1 Since adoption of the Local Plan in 2021 nationally there is a focus and new legislation on topics such as climate change, biodiversity and providing homes for all, all of which are opportunities for North Warwickshire to introduce new policies or amend existing ones to be proactive and assist with the sustainable growth of the Borough.

16 Detailed assessments of policies

- 16.1 For each policy of the adopted Local Plan, an assessment has been made as to its compliance with national policy, its performance against the objectives of the monitoring framework and whether any other relevant local evidence has impacted on the effectiveness of the policy. A conclusion is then reached as to whether the policy requires updating/replacing, some changes, or no change. Each policy is graded Red, Blue or Green, due to the significance of the changes required (Red - significant changes required; Blue – may require some changes and Green - no change required). A summary of the policies that have been included in each category is provided in table 3 below.

Table 3: Assessment of Local Plan policies

Policy Number	Policy Title	Is the policy strategic or local?	Commentary	Summary
LP1	<i>Sustainable Development</i>	Strategic	There has been no change to the definition of sustainable development in the NPPF. There is increased emphasis on the right infrastructure being delivered so the policy may benefit some revisions.	No changes required
LP2	<i>Settlement Hierarchy</i>	Strategic	Settlement Sustainability Appraisal has been updated and indicates that settlements remain broadly within the correct category of settlement. There has been loss of services and facilities, but this has been across the Borough as a whole so does not change the overall picture.	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.
LP3	<i>Green Belt</i>	Strategic	Consultants have been commissioned to carry out a GB Review as NPPF has introduced the concept of grey belt in the Green Belt.	Requires changes to reflect updated national policy.
LP4	<i>Strategic Gap</i>	Strategic	Coalescence is a key part of this policy. As pressure and more development takes place the importance of this policy increases. No change to the overall policy. The AMR indicates that it is working well. There continues to be a lot of pressure of development especially close to the junction. Additional areas will be assessed as part of the evidence base and will be identified on the policies map if required.	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base
LP5	<i>Amount of development</i>	Strategic	As the Local Plan will look to 2040 / 2045 the policy will require to be updated.	Broadly compliant with national and local policy but requires clearer wording on policy expectations.
LP6	<i>Additional Employment Land</i>	Strategic	Following the appeal at Junction 10 M42 the policy would benefit from changes to make the policy clearer as to what is required and expected.	Broadly compliant with national and local policy but requires clearer wording on

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				policy expectations.
LP7	<i>Housing Development</i>	Strategic	SHMA update being commissioned through Coventry and Warwickshire Housing officers. Any changes to be reflected in the policy.	Requires changes to reflect update to development needs. Broadly compliant with national and local policy but may require updating once evidence base has been updated.
LP8	<i>Windfall</i>	Strategic	<p>Para 73 d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.</p> <p>Para 75. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.</p> <p>No change required other than making sure there is evidence for the windfall allowance and adjusting the figure accordingly to that evidence.</p>	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.
LP9	<i>Affordable Housing Provision</i>	Strategic	Paras 63 to 68 have been altered so need to check compliance, but minor change only expected.	Broadly compliant with national and local policy but may require updating once evidence base has been updated.
LP10	<i>Gypsy & Travellers</i>	Strategic	No change in NPPF so updated evidence on number of pitches may be required.	No Change
LP11	<i>Economic</i>	Strategic	Some changes have been made to the Use Classes Orders and	No change.

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	<i>Regeneration</i>		General Permitted Development Orders. However it is not considered tthis requires any further changes to policy.	
LP12	<i>Employment Areas</i>	Local	Update to reflect any boundary changes at current identified employment areas or addition of any new areas. For example: 1 Carlyon Road Industrial estate; and, 2 Indurent Park formerly St Modwen's south-east of Junction 10, M42.	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.
LP13	<i>Rural Employment</i>	Strategic	Some changes have been made to the Use Classes Orders and General Permitted Development Orders. However it is not considered tthis requires any further changes to policy.	No change.
LP14	<i>Landscape</i>	Strategic	Main update is to reflect findings and assessment of North Warwickshire's Landscape Character Assessment review and Landscape Sensitivity assessments of sites. Consultants have already been engaged to update this information.	Broadly compliant with national and local policy but may require updating once evidence base has been updated.
LP15	<i>Historic Environment</i>	Strategic	No major changes to historic Environment legislation or regulations that require reflecting. However, need to make reference to historic farmsteads and reflect the historic importance to the Borough and seek retention and re-use of historic materials.	No major changes required but update to evidence and historic asset protections required.
LP16	<i>Natural Environment</i>	Strategic	BNG has now been introduced and takes over from the biodiversity offsetting.	Broadly compliant with national and local policy but may require updating to reflect changes in National Guidance with introduction of Biodiversity Net Gain (BNG) in the Environment Act 2021 and DEFRA guidance 2023 and potentially 2025
LP17	<i>Green infrastructure</i>	Strategic	Sub-Regional Green Infrastructure Study has recently been reviewed and updated to reflect both Environment Act 2021 and Environmental Improvement Plan 2023 including Local Nature Recovery Strategies (LNRS's)	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.

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LP18	<i>Tame Valley Wetlands Nature Improvement Area (NIA) including Kingsbury Water Park</i>	Local	No change in TVWNIA proposed. Impact of LNRS?	No changes required
LP19	<i>Local Nature Reserves</i>	Local	No new LNR's designated. Riverbank proposed LNR still pending.	No changes required
LP20	<i>Green Spaces</i>	Local	No additional Green Spaces currently proposed.	No changes required
LP21	<i>Services and Facilities</i>	Strategic	Some changes have been made to the Use Classes Orders and General Permitted Development Orders. However, it is not considered this requires any further changes to policy.	No changes required
LP22	<i>Recreational Provision</i>	Local	No review to current evidence base programmed.	No changes required
LP23	<i>Transport Assessment and Travel Plans</i>	Local	Strategic Traffic Assessment of whole plan will be required. However, this does not affect the wording of this particular policy.	No changes required
LP24	<i>Stations</i>	Strategic	Maintain potential for new station provision as identified.	No changes required
LP25	<i>Railway lines</i>	Strategic	The cancellation of the HS2 Phase 2b section may need to be noted, although the safeguarded land identified and designated in Plan is still expected to remain.	No changes considered necessary
LP26	<i>Strategic Road Improvements</i>	Strategic	Update on A5 situation required in the policy and its impact on the delivery of the NWLP2021. An updated Strategic Transport Assessment will be required to determine the future deliverability of the Local Plan.	Broadly compliant with national and local policy but may require updating to reflect changes to the funding of A5 improvements.
LP27	<i>Walking and Cycling</i>	Strategic	Warwickshire County Council have adopted a LCWIP	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base.
LP28	<i>Level Crossings</i>	Local	No change in legislation affecting sites and level crossings.	No changes required
LP29	<i>Development Considerations</i>	Local	The Government are to introduce the NPPF Development Management policies so there is no need to change this policy until it is clear what those policies will cover.	No change. Await the NPPF Development Management Policies

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LP30	<i>Built Form</i>	Local	New National Development Control Policies may replace these local development management policies.	No change. Await the NPPF Development Management
LP31	<i>Frontages, Signage & External Installations</i>	Local	No review of current evidence base.	No change. Await the NPPF Development Management
LP32	<i>New Agricultural & Equestrian Buildings</i>	Local	No review proposed.	No change. Await the NPPF Development Management
LP33	<i>Water Management</i>	Local	Review of water management policy to ensure full compliance with Statutory Regulations with particular reference to introduction of defined watercourse buffer zones.	Broadly compliant with national and local policy but would benefit from review.
LP34	<i>Parking</i>	Local	Would benefit from minor alterations especially to ensure lorry parking is covered.	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.
LP35	<i>Renewable Energy & Energy Efficiency</i>	Local	NPPF has been updated. Policy needs to be updated to reflect these changes and consider what is required on developments. Building regulations now cover the provision of EV Charging for cars but does not still cover for e bikes. Net zero should be a key requirement of any development.	Broadly compliant with national and local policy but may require updating to reflect changes in National Policy and Guidance.
LP36	<i>Information and Communication Technologies</i>	Local	No review proposed.	No change. Await the NPPF Development Management
LP37	<i>Housing Allocations - Sites H1 to H17</i>	Strategic	Sites with planning permission prior to the latest monitoring year will need to be deleted from the list as they will be included in the commitments or completions. New sites will need to be added	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.

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LP38	<i>Reserve Housing sites</i>	Strategic	Changes to status of Reserve Sites may be required.	Broadly compliant with local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.
LP39	<i>Employment Allocations - Sites E1 to E4</i>	Strategic	Sites with planning permission prior to the latest monitoring year will need to be deleted from the list as they will be included in the commitments or completions.	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.
	<i>Various Specific Site Policies by Settlement E1 to E4</i>		Sites with planning permission prior to the latest monitoring year will need to be deleted from the list as they will be included in the commitments or completions. New sites will need to be added	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.
	<i>Various Specific Site Policies by Settlement H1 to H17</i>	Only sites over 100 units	Sites with planning permission prior to the latest monitoring year will need to be deleted from the list as they will be included in the commitments or completions. New sites will need to be added	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.

17 Conclusion

17.1 As a result of the above assessment it is clear that some of the policies do not need to be reviewed or updated as part of this review. A partial review of the Local Plan is therefore recommended.

Table 5: Summary Table of Policy Assessment against the NPPF and any other changes

Significant changes required (0)		Requires significant changes to reflect updated national policy.
Modifications required (3)	LP3 Green Belt – introduction of grey belt to the overall Green Belt may involve changes to the Policies Map and some change to policy wording LP5 Amount of development – numbers need to be updated LP35 Renewable Energy & Energy Efficiency	Broadly compliant with national policy but require some updating.
Would benefit from minor alterations (17)	LP2 Settlement Hierarchy LP4 Strategic Gap LP6 Additional Employment Land LP7 Housing Development LP8 Windfall LP9 Affordable Housing Provision LP12 Employment Areas LP14 Landscape LP15 Historic Environment LP16 Natural Environment LP17 Green infrastructure LP26 Strategic Road Improvements LP33 Water Management LP34 Parking LP37 Housing Allocations - Sites H1 to H17 LP38 Reserve Housing sites LP39 Employment Allocations - Sites E1 to E4 Various Specific Site Policies by Settlement E1 to E4	Broadly compliant with national and local policy but would benefit from updating due to revised evidence base or need to revise the evidence base.
No changes required (19)	LP1 Sustainable Development LP10 Gypsy & Travellers LP11 Economic Regeneration LP13 Rural Employment LP18 Tame Valley Wetlands Nature Improvement Area (NIA) including Kingsbury Water Park LP19 Local Nature Reserves LP20 Green Spaces LP21 Services and Facilities LP22 Recreational Provision LP23 Transport Assessment and Travel Plans LP24 Stations LP25 Railway lines LP27 Walking and Cycling LP28 Level Crossings LP29 Development Considerations LP30 Built Form	No changes required. (Apart from minor update or reference to other policies subsequently changing or updating)

	LP31 Frontages, Signage & External Installations LP32 New Agricultural & Equestrian Buildings LP36 Information and Communication Technologies	
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GBBCHMA / WMCA Plan making as at May, 2025	
Birmingham	<p>Consultation on Regulation 18 Preferred Options completed July / August 2024. The new NPPF proposes a much lower housing need for Birmingham, so an additional Regulation 18 consultation exercise is to be undertaken. A revised LDS was approved in January 2025, key milestones are as follows:</p> <ul style="list-style-type: none"> • Additional Regulation 18 consultation: November/December 2025 • Regulation 19 Consultation: June/July 2026 • Submission for examination: October 2026
Black Country	<p>Wolverhampton: Regulation 19 to be considered by Cabinet in November 2024, with consultation December / January 2025, 11,400 housing shortfall. Plan submitted for examination March 2025</p> <p>Sandwell: Submitted for examination December 2024. Housing shortfall estimate 18,000. Hearings to commence 15th July for one week and reconvene 23rd September for two weeks.</p> <p>Walsall: Cabinet agreed revised LDS December 2024, aiming to prepare under the current regulations, deadline for submitting December 2026.</p> <ul style="list-style-type: none"> • Regulation 18 consultation on a hybrid issues and options/ preferred options expected in Autumn 2025 • Regulation 19 consultation in Summer 2026. <p>Dudley:. Plan submitted for examination in February 2025 under NPPF 2023 and NPPF 2024 transitional arrangements. Hearings commence 10th June 2025.</p>
South Staffordshire	<p>Regulation 19 plan consulted on during April / May 2024. Plan submitted for examination December 2024.</p> <p>The hearing sessions will be held virtually on the following dates –</p> <ul style="list-style-type: none"> • Tuesday 27th to Friday 30th May • W/C 21st July • W/C 28th July <p>The draft hearing programme, timetable, and participants are available on the examination website.</p>
Lichfield	<p>Cabinet report agreed in March 2024 setting out next steps and including a new LDS. Confirms that will be progressing under the proposed new arrangements as will not meet the June 2025 deadline for progressing under current system. Subject to not be called in, Issues and Options document consultation to commence 30/10/24, now complete</p>
Bromsgrove	<p>LDS to Cabinet February 2025. Proposes a draft plan in summer 2025, will proceed under new system once details finalised.</p>
Tamworth	<p>New LDS published February 2025.</p> <p>Propose Regulation 19 consultation around this time next year, with submission by December 2026 deadline to progress through current system.</p>
Redditch	<p>LDS to Cabinet February 2025. Proposes issues and options consultation spring 2025 will proceed under new system once details finalised.</p>

Shropshire	The Inspectors have rejected the Council's project plan to address the outstanding issues and advised that the plan is withdrawn or receive an unsound report. Withdrawing the plan requires a resolution from full council.
South Warwickshire (Warwick and Stratford-on- Avon)	Aiming for Joint Cabinet meeting in December 2024 to agree Regulation 18 Preferred Option for consultation closes 7/3/25. Submission now anticipated in summer 2026 with adoption by end of 2027.
Rugby	Preferred Option consultation 24 March 2025 until 5 pm on 19 May 2025.
North Warwickshire	Issues and Options for Employment DPD published for consultation until 9/5/24. Draft Employment Plan 1 July LDF Sub=committee for consideration. LDS to LDF Sub-committee February 2025 for local plan review: <ul style="list-style-type: none"> • Issues and options spring 2025 • Regulation 18 summer 2025 • Regulation 19 December 2025
Cannock Chase	Local Plan review submitted for examination and Inspector appointed in December 2024 Hearings to commence May 2025.
Solihull	Following the Inspectors of 4 th September, Full Council resolved to withdraw the plan on 8 th October and agreed to progress preparation of a new plan; a revised LDS approved by Cabinet December 2024: <ul style="list-style-type: none"> • Winter 24/25 – Launch Call-for-Sites exercise • Autumn 25 – Publish a Regulation 18 Preferred Options Plan • Summer 26 – Publish a Regulation 19 Draft Submission Plan • Autumn 26 – Submit plan for examination • Winter 26/27 – Examination hearings
Coventry	Issues and Options consultation launched 18/7/23 for eight weeks followed by further call for brownfield sites. Revised LDS approved February 2024. Consultation on Regulation 19 plan until 3/3/25 with submission to follow later this year.
Telford and Wrekin	Regulation 18 plan published for consultation 25 October 2023 – 31 January 2024. Regulation 19 plan consultation plan published, closing date for representations 5 th May 2025.
Wyre Forest	Plan formally adopted 26 th April 2022.
Nuneaton and Bedworth	Plan submitted to PINS for examination 12 February 2024 and hearings now completed.