

## **Matter 7 - Monitoring and Review**

### **Policy DS8 - Review**

**176. Is the policy sufficiently clear and responsive in setting out under what circumstances a full or partial review of the Plan would be triggered? [and]**

**177. Does the policy need to be more explicit about what evidence and what level of change would be required regarding housing and employment need in order to trigger a review?**

- 1.1 Policy DS8 is not clear in setting out the circumstances that would trigger a full or partial review of the Plan.
- 1.2 There is no definition of 'significantly' in the first bullet point to understand what level of change warrants a full or partial review of the Plan. In addition, the first bullet point refers to a requirement for changes in evidence following adoption of the Plan, however publication of the West Midlands Strategic Employment Land Needs Study (WMSESS) and updated sub-regional HEDNA (to align the findings of the Coventry and Warwickshire HEDNA and WMSESS) are likely to be published in mid September 2024, and certainly ahead of the Plan's adoption.
- 1.3 If the Plan is adopted as per main modification CD21 neither WMSESS or the revised HEDNA would trigger a review since these would be pre-adoption of the Plan.
- 1.4 In respect of the second bullet point, this does not read properly alongside the text at the beginning of the policy. Moreover, the WMSESS is expected to be published in September 2024. The relevant authorities each have a draft copy. Its imminency warrants strategic B8 warehousing needs to be dealt with now, via new allocations, to avoid significant delays in the delivery of much needed land.
- 1.5 We have concerns with the effectiveness of a review policy for strategic warehousing land since much of the Borough's strategic road network is within the Green Belt. Thus, additional sites to meet strategic employment needs will most likely be needed on Green Belt land as a result. Changes to the Green Belt can be made only through the plan-making process (NPPF, paragraph 145), and it is our view that the Council should consider the need to meet sub-regional strategic warehousing needs as an exceptional circumstance and plan for this now.
- 1.6 Notwithstanding the points above, if it is considered appropriate to deal with strategic employment needs via a review policy this should be more explicit about what evidence and what level of change is required to trigger such review. In terms of evidence the second bullet point of the policy refers to a West Midlands Strategic Employment Land Needs Study. We have assumed that this is referring to the WMSESS, but this should be clarified and amended accordingly. In terms of employment evidence the second bullet point should also refer to any

updated / revised sub-regional HEDNA. In our view, the draft Plan has effectively ignored the sub-regional strategic B8 needs set out in ED2.1 (since Faultlands Farm was an existing allocation which is now complete) and therefore any level of need formally apportioned to the Borough should trigger a review.

- 1.7 We also note that a review of the Plan hinges on the 'Council's' publication of a West Midlands Strategic Employment Land Needs Study/WMSESS. This could pose a risk if the Council intentionally delay its publication. The policy should instead relate to this evidence becoming publicly available.
- 1.8 Since a West Midlands Strategic Employment Land Needs Study/WMSESS is expected next month, a review of the Plan, triggered by the second bullet point of the policy will apply ahead of its adoption and the criterion of the policy should be amended to reflect this.

**178. Does the policy have sufficient regard to and set out the approach to dealing with the possibility of unmet housing and employment need arising in the housing market area/region?**

- 2.1 The policy does not have regard to or set out an approach for dealing with the possibility of unmet employment needs arising the market area.
- 2.2 As set out in Stoford's Matter 2 statement, the Plan does nothing to try and address, or plan for, what is likely to be a significant amount of the sub-regional, strategic B8 requirement. Instead, the Plan [CD1] seeks to reallocate the strategic employment sites from its 2019 Plan, which will be complete in 2029, and claims that Faultlands Farm will fulfil its strategic B8 role for the sub-region, despite planning permission being granted in 2020 ahead of the sub-regional evidence on strategic B8 need in 2022.
- 2.3 It is well known that Coventry City Council will struggle to meet a proportionate share of the strategic warehousing need, within its administrative boundaries since it has previously had to rely on Nuneaton and Bedworth (for housing), Rugby (Ansty Park and Prologis Park Ryton for employment) and Warwick (SEGRO Park Coventry, for employment) to meet some of the City's needs.
- 2.4 Furthermore, as set out under questions 175 ad 176, additional sites to meet strategic B8 needs will most likely be needed on Green Belt land. Thus, we have concerns with the effectiveness of a review policy for dealing with strategic warehousing needs when changes to the Green Belt can be made only through the plan-making process (NPPF, paragraph 145).
- 2.5 Nonetheless, if a review policy in the Plan is considered appropriate, Policy DS8 should be amended to include an additional bullet point that carefully deals with the possibility of unmet housing and employment need arising in the housing market area/region.