

Coventry Local Plan Review Issues and Options Consultation

Issues and Options Consultation

Chapter 4: Jobs and Economy

Preamble - the City's priorities for sustainable economic development and addressing climate change

The Local Plan will support the aim of the One Coventry Plan to increase the economic prosperity of the city and region and promote job and employment opportunities including in the main growing business sectors in the city, which include advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional & financial services; digital, creative, and gaming. However, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national figures, which the local plan will try and align with the One Coventry Plan on to address.

The Local Plan, by promoting the five development pathways in the Council's Climate Change Strategy, can also better align with the corporate aims for jobs and the city's economy, specifically by promoting the pathway of lowering emissions and promoting the circular economy and the new economic and job opportunities that could be delivered from that. Also, by addressing the reliance pathway and reducing the risks of climate change and extreme weather events such as flooding, heatwaves and droughts can allow the city to function more sustainably and more self-sufficiently having a positive impact on the economy. The Local Plan will also align with the Council's Economic Development Strategy which will create a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow and new local jobs are created.

The Council's Economic Development Strategy ^[1] is focused upon creating a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow and new local jobs are created. This includes emphasis upon a strong support infrastructure, social value, sustainability, skills, and an ambition to lead in the green industrial revolution to tackle the challenges and opportunities presented by climate change.

1. <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/2> [back]

Defining the economy and 'employment' in planning terms

The explanatory text to this chapter in the current adopted plan states that the employment policies and references to 'employment land', 'employment uses' and 'employment purposes' relate only to development falling within Use Classes B1, B2 and B8 of the Town & Country Planning Use Classes Order 1987 as amended. These comprise business offices (Use Class B1a), research and development activities (Use Class B1b), light and general industrial uses (Use Classes B1c and B2) and uses within the storage/distribution sector (Use Class B8).

This is now out of date because the Use Classes Order was amended in 2021, so Class B1 (light industrial use) now sits within a new Use Class E. Light Industry comes under Class E part g) i) office ii) the research and development of products or processes or iii) any industrial process, (which can be carried out in any residential area without causing detriment to the amenity of the area).

Therefore; any definition relating to 'employment use', as the plan currently stands, can only relate to Class B2 (general industrial) and Class B8 (storage / distribution).

We are therefore considering how we deal with this matter. If we replace the reference to Class B1 with E(g) when we define 'employment use' this gets complicated as there are several uses within the wider Use Class E to which light industry can change under Permitted Development rights i.e. no planning application is needed. This means it is also very hard to monitor and track progress.

The Housing and Economic Development Needs Assessment (HEDNA) calculates need and supply using the following categories: Offices, Class B2 (general industrial) and Class B8 (warehousing – ie storage and distribution). If we are to protect our supply and track progress through monitoring, we need a new approach to ensure that our employment provision can be properly managed and does not get eroded.

Proposed new policy: defining 'employment'

Based on this information, we are proposing the following policy in terms of how we define 'employment'.

For the purposes of supply (and therefore monitoring) we propose that this relates to:

- Class E Part g (i to iii), plus classes B2 and B8

For the purposes of decision making we propose that this relates to:

- Class E Part g (i to iii), Classes B2 and B8, and other uses which can clearly demonstrate that they serve an employment purpose in the local economy

In terms of decision making we think in some instances we may need to remove Permitted Development rights to protect key employment sites from being changed to other uses without due consideration through the planning process. However, we need to be mindful that the flexibilities afforded by the new Class E are to enable the market to be able to respond to rapid change so such restrictions must be used sparingly and with careful consideration.

Allocated employment sites are clearly fundamental to the strategic aims of the Local Plan, however there will be other existing sites of varying size and nature which are high quality and / or which provide an important employment role locally. We are proposing to undertake an Employment Land review (ELR) which will categorise our employment sites and enable us to make a balanced judgement as and when planning applications come forward as to whether they should be protected for employment use or whether they might be suitable for other purposes. A new policy would provide a 'hook' to the ELR.

QUESTION 12

Do you have any comments on our proposals to introduce a new policy which defines our definition of 'employment' for planning policy purposes?

Policy JE1: Overall Economy and Employment Strategy

Policy JE1 is a general policy which provides positive support for Coventry's economy. We think that a few minor updates are needed (for example we need to include reference to the role of the West Midlands Combined Authority, updates to replace references to the Ricoh Arena and so on).

However, in order to better reflect the One Coventry Plan and the emerging climate change strategy we suggest that the policy could be strengthened.

We think that this policy should positively support employment which helps the area achieve its ambitions to be a leader in the Green Industrial Revolution, which operates to the highest energy efficient standards, which is involved in the development and production of new technology which addresses climate change. We also think the policy should support retrofitting for employment where appropriate, and should encourage the use of renewable energy including maximising roof space for solar panels for example

We also feel we should be supporting employment which is sustainably located, for example employing and training local people who can access jobs by walking, cycling and by public transport, and which is linked to a range of other services and infrastructure which support employees, for instance childcare facilities.

We also want to see more employers provide green infrastructure as part of their development proposals, linking to the review of our policies on Green Infrastructure and biodiversity, creating a much better connected network of green links across the area. Well planned and maintained open green space also creates an important environment for employees, with positive health benefits (see Chapter 2, health), and is attractive, helping to attract investment in an area.

QUESTION 13

Do you have any comments on our proposals that Policy JE1 could be strengthened in line with our proposals?

QUESTION 14

Do you have any comments, or local evidence which might be helpful in assisting us develop standards for new employment sites?

Policy JE2: Provision of Employment Land and Premises

Policy DS1 sets out the quantum of employment growth for the plan period.

We consider that this policy needs updating in terms of the quantum of development. The starting point will be the strategic options for growth as set out in our review of Policy DS1. We are asking for comments in the section: Overall Development Needs.

Once we have determined what figure we think sets an appropriate strategic need we need to look at what can realistically be delivered within Coventry's administrative area.

In terms of the supply from 2021 – 2041, initial calculations indicate the following:

Table 2 Available Employment Land at March 2023

Site type and status	Hectares (Net)
Non-allocated sites under construction	0.08
Non-allocated sites with permission but not yet started	1.98
Total non-allocated employment sites coming forward	2.06
Allocated sites with planning permission	-0.19 ^[2]
Allocated land without permitted planning	58.48

permission	
Total available employment land	60.35

Policy JE2 will need updating to reflect the current position on the current Local Plan employment allocations, which are summarised in the following table:

Table 3 Employment Land Supply at March 2022

Site Ref	Site	Ward/LPA	Remaining Area Ha	Employment Type
JE2:1	Friargate (part of mixed use site)	St. Michael's	6.52	Primarily B1a
JE2:2	Lyons Park	Bablake	Completed	B1, B2 & B8
JE2:3	Whitley Business Park	Cheylesmore	6.46	B1b&c, B2 & B8
JE2:4	Land at Baginton Fields and South East of Whitley Business Park	Cheylesmore	25	B1b&c, B2 & B8
JE2:5	A45 Eastern Green (part of mixed use site)	Bablake	15	B1b&c, B2 & B8
JE2:6	Whitmore Park (part of mixed use site)	Holbrook	2.5	B1b&c, B2 & B8
JE2:7	Durbar Avenue (part of mixed use site)	Foleshill	1.5	B1b&c & B8
JE2:8	Land at Aldermans Green Road and Sutton Stop (part of mixed use site)	Longford	1.5	B1c & B8
	TOTAL		58.48	

The HEDNA provides commentary and makes assessment of employment land needs across the sub-region and for each individual local authority within the sub-region. It assesses employment land based on three types: Office, General Industrial/warehousing and Strategic B8.

The table below compares, by use class, the existing supply of employment land, the need figure as evidenced in the HEDNA and as a result, whether there is an over or under supply.

Table 4 Supply vs Need

Land Type	Existing Supply (ha)	HEDNA Figure (ha)	Over/Under supply (ha)
Office	6.61	3.9	2.71 over supply
Industrial	26.87	-8.9	17.97 over supply
Warehousing/Distribution	26.15	17.8	8.35 over supply

Note: A number of sites are allocated for a combination of B1 (E, B2 and B8 uses have been included in the above chart. Given the uncertainty around their delivery and the mix of uses, these sites have been divided equally between B2 and B8, with an assumption that and B1 use is ancillary. This is based on the nature of the sites and their location and future uses.

2. Excludes City Centre South due to unknown quantum at this stage. Data taken from HELAA [\[back\]](#)

QUESTION 15

In relation to Policy JE2, Do you have any comments on the supply of employment land?

QUESTION 16

We are always keen to understand the employment land needs from local businesses and residents. Therefore, do you have:

1. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1 (in the online version this can also be found in the 'response templates' section).
2. A site you would like us to investigate? Please provide as much detail as you can
3. Another suggestion or comment – please provide detail

Part 3 of the policy refers to 58ha 'rolling supply'. Whilst it is important that the policy recognises the need for a supply of sites throughout the plan period to be able to respond to need, we think that monitoring against the overall requirement and performance of the allocations over the plan period, supported by positive policy elsewhere in this chapter should be sufficient as there is no national requirement to report on a specific annual figure and the NPPF emphasis is about being clear on locational requirements and the ability to adapt to rapid change. We therefore propose to change the emphasis of Part 3 of the policy to reflect the emphasis in the NPPF.

We also propose to produce an Employment Land Review (ELR) which would enable us to define and protect our highest quality employment premises (of all sizes) whilst allowing flexibility in the market elsewhere to ensure it can respond to rapid change without undermining a sustainable, balanced strategy. We would reference the need to have regard to the ELR in decision making in this policy as set out earlier in this chapter.

QUESTION 17

Do you have any comments on our proposed changes to part 3 of Policy JE2?

Policy JE3 Non-Employment uses on Employment Land

In terms of the definition of 'employment land' and what therefore can be categorised as a 'non employment use' for this purpose is considered at the start of this chapter and we welcome comments on this and our proposals to broaden the definition as the policy is felt to be too restrictive at present.

In terms of the policy wording itself (notwithstanding the wider context in terms of defining 'employment') we think this remains largely up to date. However, we think one aspect can be improved. Part 1 of the policy protects employment uses stating:

Proposals for the redevelopment in whole or in part of employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where nonemployment development is proposed are:

- 1. No longer suitable for employment use bearing in mind their physical characteristics, access arrangements and/or relationship to neighbouring land-uses **and** [our emphasis] there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this;*

It is our view that if a site is clearly not suitable for employment due to the reasons cited, then marketing should not be required. Therefore we proposed that 'and' is changed to 'or': ie

- 1. No longer suitable for employment use bearing in mind their physical characteristics, access arrangements and/or relationship to neighbouring land-uses **or** [our emphasis] there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this;*

QUESTION 18

Do you have any comments on our proposed changes to JE3 Part 1a?

QUESTION 19

Do you have any other comments regarding policy JE3?

JE4 Location of Office Development

Chapter 3 deals with revised overall growth needs and references the HEDNA figure which recommends up to 8.5 HA for office provision over the plan period (to 2041). Policy JE4 is delivered in this context.

It is our view that the intent of the policy remains largely fit for purpose (ie to deliver an appropriate amount of office space in sustainable, mainly town centre locations), however in order to bring it up to date we propose the following changes:

- The reference to Friargate Class B1 office development needs to be changed to Class E g (i) as this reflects changes to the Use Classes Order
- Permitted Development rights should be removed from major office developments to avoid undermining the aim of the Local Plan to deliver a sustainable and balanced strategy
- References to 'large scale' office development should be replaced with 'major' office development
- We think references to the need for offices to be close to a primary route on the highway network does not fit in with the climate change agenda and that this should instead be changed to refer to sustainable modes of transport

- Part 5 of the proposals refer to the need for an Impact Assessment as this was, at the time, required by national policy. This is no longer the case, so we propose to delete this and instead rely upon the sequential test.

QUESTION 20

Do you have any comments on our suggestions for proposed changes to Policy JE4?

JE5 Location of R&D, Industrial and Storage / Distribution Development

We are interested in exploring the review of this policy further. It is our initial view that the Research and Development and Industrial / Storage and Distribution markets are very different and might be better addressed through two separate policies.

Firstly, in terms of industrial use, Storage and Distribution, Chapter 3 sets out the overall needs as determined by the HEDNA. This separates out 'strategic B8' which is of such a scale that it can only be properly considered at the regional scale and this work is ongoing across the region separately.

In terms of proposals for more localised industry, storage and distribution we feel the current policy wording is still applicable and would be relevant to a separate Industrial and Storage / Development policy.

In terms of the Research and Development sector however, whilst much of this is undertaken on large business / science parks we feel this is not exclusively the case (for example laboratories linked to universities, other emerging sectors) and we want to understand more about the locational and operational needs of this sector to ensure our policies support this.

QUESTION 21

Specifically in terms of general industrial, storage and distribution matters (not research and development which we consider separately), do you consider that the wording of policy JE5 is still up to date?

QUESTION 22

In terms of research and development needs do you think the wording of Policy JE5 is still relevant or do you think we need to recognise it as a separate issue? What evidence do you have which can help us better understand the needs of the sector?

QUESTION 23

Are there other sectors we should be considering in being able to support their specific needs? What are these needs and do you have any information and evidence which would help us understand and accommodate these?

JE6 Tourism / Visitor Related Development

We think this policy could be strengthened as it needs to be aligned to the NPPF and to treat tourism use as a defined 'main town centre use' to ensure tourism and culture are more strongly supported within the local context.

QUESTION 24

Do you have any comments on our suggestion that policy JE6 should treat tourism as a main town centre use?

QUESTION 25

Do you have any other comments or suggestions relating to tourism and Policy JE6, including evidence if this is applicable?

JE7 Accessibility to Employment Opportunities

This policy seeks to ensure that local people, especially those from the most deprived communities, are given opportunities to access employment from new or expanded developments. We think this policy remains relevant and up to date although reference to CIL should be updated to 'developer contributions' to ensure it remains resilient to future changes by Government.

QUESTION 26

Do you have any comments on our view that policy JE7 remains up to date?

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