

The New **Coventry** Local Development Plan (2011 – 2031)

Delivering Sustainable Growth
September 2014



1. Introduction

This paper provides the next step in delivering a new Local Plan for Coventry. Although its principle focus is to consider how the city's housing needs will be met between 2011 and 2031 it also provides a baseline for other areas of policy. These will not necessarily be affected by the geographical distribution of housing needs and will reflect other evidence, challenges, opportunities and requirements.

This is the first stage of community and stakeholder engagement since the Council withdrew its previous Core Strategy from examination in March 2013 and reflects a period of evidence gathering in order to respond to the issues raised by the Inspector.

In preparing this paper the Council has had full regard to the Inspector's correspondence in 2013 as well as the National Planning Policy Framework (2012), National Planning Policy Guidance (2014) and the Localism Act (2011). The development of this paper has also given full regard to the latest evidence documents available to inform policy and given full consideration to consultation responses that have been received to previous versions of the Local Plan (or Core Strategy as it was known) dating back as far as 2004 but as recent as 2012.

2. Background

In recent years the Council has undertaken a range of consultation exercises on various stages of developing a new Core Strategy. These consultations have considered all aspects of planning policy, although the fundamental focus has always been around the level of growth and how that growth is delivered. Chapter 2 of this paper provides a timeline which tells the story of this journey.

Of key importance though are the introduction of the Localism Act in 2011, the formal revocation of Regional Strategies in 2013 and the introduction of the National Planning Policy Framework (NPPF) in 2012. This means Local Planning Authorities (LPA) are no longer guided by Regional Spatial Strategies when establishing their housing requirement, but are able to identify their own housing needs for their housing market area. This must however be considered jointly with neighbouring authorities where market areas cross council boundaries.

In the Inspector's commentary of 2013, he was clear that the Coventry housing market area covered much of Warwickshire, with a particular focus on the Local Authority areas of Warwick, Rugby and Nuneaton and Bedworth. As such, the housing needs of the market area have been examined through an independent study completed by GL Hearn planning consultants in November 2013.

3. National Guidance

The National Planning Policy Framework (NPPF) was published in May 2012 and replaced all existing Planning Policy Statements and Guidance (PPS and PPG). The new National Planning Policy Guidance notes were then published in March 2014 and have replaced the vast majority of supporting guidance documents and notes.

The Localism Act (2011) introduced regulations that encourage a movement away from Local Development Frameworks and Core Strategies, back towards a Local Plan type document. In simple terms this means planning policy will be focused towards a single document covering all high level policy and site allocations instead of a range of documents covering different topic areas. As such, the NPPF refers to the development of Local Plans and is clear that any additional documents should only be used where clearly justified. It is for this reason that the City Council is rebranding this document as the Local Plan instead of a Core Strategy. One additional document will be produced to support the regeneration of the city centre, but this is clearly justified by the economic and social importance placed upon the city centre and will be subject to separate periods of community and stakeholder engagement.

Paragraph 150 of the NPPF states that "Local Plans are key to delivering sustainable development that reflects the vision and aspirations of local communities". They "must be prepared with the objective of contributing to the achievement of sustainable development" and include a "presumption in favour of sustainable development". Where appropriate the development of plans and evidence must be considered jointly with neighbouring authorities and key stakeholders. This is part of the Duty to Co-operate.

4. The Duty to Co-operate

Satisfying the Council's responsibilities through the Duty to Co-operate is vital to the delivery of an acceptable Local Plan.

The Council must ensure it engages with its neighbours and key stakeholders in an active, constructive, effective and on-going basis on a range of strategic policy issues. Such issues include:

- The delivery of housing
- The delivery of key employment opportunities
- Any amendments to Green Belt boundaries
- The delivery of significant infrastructure projects

The City Council has managed key elements of the Duty to Co-operate through joint working, evidence gathering and information sharing alongside its neighbouring authorities, the Local Enterprise Partnership (LEP) and Local Nature Partnership (LNP). Such work has included:

- Joint Strategic Housing Market Assessment (SHMA) (2013)
- 2012-based Sub-National Population Projections: Implications for Housing Need in Coventry & Warwickshire (Joint SHMA Annex 2014)
- Joint Green Belt Review (2009) – report to be updated for 2014
- Strategic Flood Risk Assessment for Coventry and Warwickshire
- Water Resources Study
- Assessment of Employment Land Requirements for Coventry and Warwickshire (2014)
- West Midlands Strategic Employment Land need assessment (being prepared - 2014)
- Local Aggregates Assessment for the West Midlands Metropolitan Authorities (2014)
- Duty to Co-operate meetings for Coventry and Warwickshire authorities

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- West Midlands Planning Officers Group
- Establishment of a Coventry and Warwickshire Economic Prosperity Board (Joint Committee) for council leaders and the LEP
- Acceptance of City Deal and Submission of the Strategic Economic Plan (SEP) for Coventry and Warwickshire and Hinckley and Bosworth.
- Establishment of Coventry and Warwickshire Co-ordinated Monitoring Group
- West Midlands Resource Technical Advisory Body to respond to strategic waste issues
- West Midlands Transport Officers Group

The Council's continued commitment to joint working and active and constructive co-operation is set out in chapter 4 of this Paper, including a draft policy proposal.

5. Identifying Objectively Assessed Housing Need

Following the recommendations of Coventry's Core Strategy Inspector in 2013, the City Council, alongside its neighbouring Warwickshire authorities jointly commissioned a Strategic Housing Market Assessment (SHMA). Such a study is a fundamental requirement of the NPPF and is essential to identify the housing needs of the area. As such, this study covered the whole of Coventry and Warwickshire and provided evidence to suggest that the six authorities formed a Strategic Housing Market Area (Strategic HMA), with a specific focus on the urban area of Coventry. The study also showed that although the six authorities formed a Strategic HMA that some authorities experience stronger links than others and that there were also links, particularly at the fringes of the Strategic HMA with neighbouring markets such as Worcestershire and the Greater Birmingham conurbation. The study was developed independently by GL Hearn planning consultants and made a number of recommendations, most notably around the Objectively Assessed Need (OAN) for housing. The study made the following recommendations about housing need:

Table 1: Objectively Assessed Need (OAN) in the Joint SHMA (2013)

Local Planning Authority	Total OAN 2011-2031	Annual OAN
Coventry City Council	23,600	1,180
Warwick District Council	14,400	720
Rugby Borough Council	13,200	660
Nuneaton and Bedworth Borough Council	9,900	495
North Warwickshire Borough Council	3,500	175
Stratford on Avon District Council	11,400	570
Housing Market Area	76,000	3,800

In addition to identifying the OAN, the Joint SHMA also made recommendations around the need for affordable housing, older persons' housing and the types, sizes and tenures of new homes.

Since the Joint SHMA was completed the Office for National Statistics (ONS) has published new sub-national population projections (to a 2012 baseline and 2013 mid-year estimates). This data provides new trend based data on fertility, mortality and migration, taking account of the Census results from 2011. The ONS data suggests there is some variation between the projected level of growth recommended in the Joint SHMA and the ONS data at Local Authority level, however, the total growth projected for Coventry and Warwickshire as a whole is largely consistent. In order to gain a full understanding of this new data GL Hearn have again been commissioned jointly by the Coventry and Warwickshire authorities to undertake an annex to the Joint SHMA and investigate the

impact this new ONS data has on the Joint SHMA recommendations and the housing needs of the strategic HMA.

The table below (table 2) identifies the recommended number of dwellings that would be required based on the new ONS data. As part of its conclusions however, the annex to the Joint SHMA places greater emphasis on the overall needs of the strategic HMA (so Coventry and Warwickshire as a whole), which conforms to the NPPF. The annex to the Joint SHMA recommends that this level of annual need (for Coventry and Warwickshire as a whole) has increased slightly from 3,800 a year (as shown in Table 1) to 4,000 homes a year (as shown in Table 2), so an annual increase of just 200 homes or around 4,000 homes over a 20 year period. The study suggests that at the local authority level there are changes in the level of housing need, but again that it is the total need of the strategic HMA that remains of greatest importance.

Table 2: Updated Housing Need (2012 based SNPP) – Joint SHMA Annex (2014)

Local Planning Authority	Updated Housing Need 2011-2031 based on 2012 SNPP	Annual Need
Coventry City Council	36,220	1,811
Warwick District Council	12,120	606
Rugby Borough Council	9,060	453
Nuneaton and Bedworth Borough Council	8,440	422
North Warwickshire Borough Council	4,080	204
Stratford on Avon District Council	10,160	508
Housing Market Area	80,080	4,004

The variations at local authority level and the difficulty of projecting housing need is reflective of using short term demographic trends, and is amplified by considering further aspects such as affordability, household formation, economic growth, travel to work patterns and migration. Housing need must also be considered within the context of deliverability, sustainable development and housing land supply (which is considered further below). What this does identify however, is an upward pressure on housing needs within Coventry and to a much lesser extent across the Housing Market Area as a whole, with a principle movement of population towards the urban area of Coventry. The most important difference however, between the recommendations of the Joint SHMA (2013) and the SHMA Annex is one of distribution and not overall need for housing across the housing market area.

As such, it is reasonable to expect that the initial OAN identified in the Joint SHMA will reflect a minimum requirement for Coventry up to 2031, and that the Duty to Co-operate, most notably with the city's Warwickshire neighbours, will form an integral part of meeting and delivering this housing need. At the current time the Coventry and Warwickshire Economic Prosperity Board (Joint Committee) has given it's support for the Joint SHMA (2013) and a number of Warwickshire authorities have already progressed significantly through their plan preparation with a view to meeting their component requirements of this assessment. Table 3 (below) highlights the progress made by the Warwickshire authorities and the level of housing they are currently planning for. The table shows housing requirements on an annual basis for ease of reference, as each authority is currently working towards slightly different plan periods. It excludes data for Coventry so should not be used as a direct comparison to the tables above.

Table 3: Status of Warwickshire Local Plans

Warwickshire Local Planning Authority	Plan Status	Annual Housing Requirement
Warwick District Council	Representations finished on Publication Draft (July 2014)	715
Rugby Borough Council	Adopted Local Plan 2011 (550 a year) but finished first round of consultation on Local Plan update in July 2014	660
Nuneaton and Bedworth Borough Council	Preferred Options Core Strategy consultation finished May 2013 , but have subsequently expressed general support for increasing the figure to meet their needs identified in the Joint SHMA.	439
North Warwickshire Borough Council	Main Modifications published June 2014 following public examination of Core Strategy (Jan 2014).	175
Stratford on Avon District Council	Representations finished on Publication Draft (July 2014)	540
Total Planned Development in Warwickshire (per annum)		2,529

The progress of many of these plans suggests a solid commitment to continuing the housing distribution evidenced by the Joint SHMA. The City Council recognises however that following the updated information provided by GL Hearn that the Warwickshire authorities may wish to review their housing provisions, so far as they relate to their local housing needs. As will be discussed below however, there are clear pressures emerging within Coventry's own administrative boundary that constrain the city's capabilities to meet its full housing needs, especially within the context of Table 2 (above). As such, the current approach to planning for housing needs set out in the Joint SHMA (2013) continues to offer a solid basis upon which to plan for and deliver the housing needs of the Housing Market Area in a sustainable and deliverable way and that conforms to national guidance.

It is particularly important however, to consider the city's housing need in the context of sustainable development, the Duty to Co-operate and deliverability. Table 4 for example, highlights

average annual house building rates over a number of five year periods. This shows that until recently average building rates in the city were declining. It is only recently that they have recovered, indeed with annual completions for 2014 exceeding 1,000 new homes. As such, the annual level of housing need identified by the Joint SHMA would represent a step change for Coventry in terms of housing delivery, whilst also presenting a similar opportunity across Warwickshire. The higher requirement would again represent a further step change in housing delivery across the market area, but a significant uplift on recent delivery trends in Coventry. To deliver this higher figure in Coventry alone would require levels of housing delivery akin to those seen in the 1950's when Coventry was experiencing strong economic growth as one of the country's largest and most influential cities. It is only prudent however, to consider the short and long term deliverability of these figures. For example, whether adequate infrastructure could be provided to support the delivery of such growth, and whether the development industry and provision of raw materials are adequately resourced to respond to it.

Table 4: Past Annual Average Delivery Rates

5 year period	1951-1955	1961-1965	1981-1985	1991-1995	2001-2005	2009-2013	Joint SHMA	New ONS based Data
Avg. homes built a year	2,150	1,476	795	509	468	759	1,180	1,811

Having regard to the above discussion, it is the view of the City Council that Coventry's minimum level of Objectively Assessed Housing Need is 23,600 homes between 2011 and 2031 (1,180 a year), which in itself would represent a step change in housing delivery for Coventry. Given its position at the centre of the strategic Housing Market Area (of Coventry and Warwickshire) however, the new data issued by the ONS suggests there may be some upward pressure on this minimum level of housing need, which is reflective of continuing trends in national population projections. There are also economic growth pressures emerging from the Strategic Economic Plan (SEP) and the types of economic growth necessary to support the sub-region in realising its full economic potential (this will be discussed further below). This not only takes the form of land for employment provisions but also for additional homes to support the growth in jobs. This is not a new phenomenon though. Table 4 shows that during the 1950s and '60s the rate of house building in Coventry was significant, reflecting a period of economic growth and prosperity for the city. The data from the ONS is telling us that people are moving to Coventry and that fewer people are leaving. It also tells us that more people are having children and that life expectancy is improving. This means the city demonstrates a significantly younger population profile than its Warwickshire neighbours, providing a growing employment base that will increasingly require high quality jobs, educational opportunities and homes. The alternative is to allow these people to leave the city in search of jobs and homes elsewhere in the country.

With this in mind the City Council is committed to continued and constructive engagement, through the Duty to Co-operate, with its Warwickshire neighbours to secure the most appropriate and sustainable locations for housing growth across the Housing Market Area. Where need can realistically be considered to originate from the city and where appropriate, sustainable and deliverable the Council will support its Warwickshire neighbours in bringing forward land for housing and employment that sits adjacent to the city's existing boundaries. This will ensure infrastructure needs are met in full across administrative boundaries (where and as appropriate). It will also help to ensure that the planning for the area's housing needs reflects the distribution issues associated with the new ONS based projections and the economic needs of Coventry and Warwickshire.

6. The Supply of Housing Land

The availability of land considered suitable for housing is assessed on a regular basis. The assessment is undertaken through a Strategic Housing Land Availability Assessment (SHLAA), which is technical evidence document supporting the development of the Local Plan. It includes the following components:

- Completions since the start of the plan period
- Sites with planning permission
- Sites currently being developed
- Remaining Site Allocations in the existing Development Plan
- Sites identified within the SHLAA as having potential for housing (SHLAA sites)
- An allowance for sites of less than five homes that cannot be identified through the SHLAA (a windfall allowance).

The draft SHLAA (2014) shows that between 2011 and 2031 approximately 16,500 new homes can be accommodated within or adjacent to the existing urban area. Of these, around 80% would be on brownfield land. This does not include any sites currently identified within the Green Belt, other than those which already have planning consent .

In addition to this, the SHLAA also highlights land within the Green Belt that could be suitable for between 6,000 and 7,100 homes (depending on density and deliverability assumptions). These sites are, however, subject to on-going examination through the Joint Green Belt Review and further evidence gathering through environmental analysis and infrastructure assessments, as well as additional input and feedback resulting from this period of public engagement.

With this in mind, Coventry could potentially deliver all its housing need within its own boundary (based on the Joint SHMA figure), but at the same time could have a shortfall of around 1,100 homes against the same number. This will depend on further evidence and engagement with stakeholders and the local community. In relation to the higher level of growth however, it would be clear that at this stage a shortfall of up to 13,720 homes could be realised if it were applied solely to Coventry. When considered in the context of Coventry and Warwickshire as a whole however, only 4,000 of these homes are not already being planned for through respective Local Plan processes .

All further work undertaken to ascertain how the city's housing need will be met, will be undertaken in a transparent way and in full accordance with the Duty to Co-operate.

The purpose of this paper and its supporting evidence is to provide an opportunity for the people of Coventry to contribute towards this on-going evidence gathering process. As set out in the NPPF the Local Plan must reflect the needs of local people and local communities whilst seeking to deliver the most sustainable forms of development. As such, the Council wholeheartedly welcomes input from local people and other key stakeholders to help progress the new Local Plan for Coventry and ensure it delivers the right amount of housing in the right locations, of the right size and quality to support the continued growth of the city.

7. Economic Growth

As well as providing new homes it is vitally important that the city's economy is supported and able to grow, providing new jobs and investment in to the city. For too long Coventry has punched below its weight and has lost jobs and employment opportunities to other parts of the country. This is

a trend that needs to be reversed to help return Coventry to the status of a 'top 10 city'. As a result of focused action and delivery by the Council and the Local Enterprise Partnership the city's decline has, in recent years, been challenged and is now being reversed. The housing pressures outlined in this report are testimony to the growing demand from people who want to live and work in the city and who are increasingly attracted to the area as a result of the resurgence of manufacturing industries in the sub-region, the success of our two world class universities and the growth in jobs across many sectors. With this in mind the City Council is fully supportive of a number of economic growth projects actively on-going within, and immediately adjacent to, Coventry. These include:

- Friargate – Office led regeneration of the Coventry train station and surrounding area
- Coventry and Warwickshire Gateway (including Whitley Business Park) – Significant investment in advanced manufacturing, logistics, and hi-tech research and development opportunities to the south and south east sides of the city
- support for continuing expansion of both The University of Warwick and Coventry university as well as the Coventry and Warwick University Hospital
- the Occupation and potential expansion of Ansty Park to the north east of the city;
- the final completions at ProLogis Logistics Park, Ryton on the city's eastern boundary
- the continued regeneration of the employment land at Browns Lane;
- tumerous employment land opportunities within the existing urban area such as Parkside, Whitmore Park and Paragon Park.

This list should not be considered exhaustive however, and the City Council remain committed to supporting new employment opportunities throughout the city. Indeed, through the Local Plan, land availability will need to be considered in balance to ensure sufficient and suitable land is identified for both new homes and new employment opportunities. The importance of this balance is becoming increasingly real. In the first three years of this plan period land previously

considered suitable for in excess of 700 homes in the urban area has been reoccupied and redeveloped for employment based opportunities, all creating new jobs across the city.

At the current time the Council has identified at least 85ha of employment land within the city and at ProLogis Park Ryton that is either readily available for development or currently under construction. How this identified supply will relate to and satisfy the needs of the city and wider sub-region (where appropriate) will be considered further as the plan evolves. This will be informed by two pieces of on-going evidence work, the first in partnership with neighbouring authorities across Coventry and Warwickshire and the Coventry and Warwickshire LEP and the second with local authorities and LEPs across the West Midlands.

In addition to traditional employment uses, Coventry City Centre will continue to experience regeneration and job creation through the City Centre South Project, Bishopgate proposals, the Coventry University masterplan and Friargate. Together these will promote new homes within the city centre alongside significant enhancements in retail, leisure, community uses, the public realm, transportation and green spaces, all of which will promote job growth and prosperity within the city centre.

Economic growth and inward investment will be key to supporting the overall growth aspirations of Coventry and Warwickshire as a whole, which is clearly identified through the SEP and supported by the Local Economic Partnership.

The Annex to the Joint SHMA investigated the growth aspirations included in the SEP and considered the impact that the economic growth forecasts would have on housing need. The SEP used data provided by Cambridge Economics, which differs to the Experian projections used in the Joint SHMA (2013). Although both sets of data were taken from similar points in time, the difference in results is reflective of the assumptions made within the models, most notably around the projected growth of different employment sectors. As a result the economic forecasts of the SEP projections could place some upwards pressure on housing need for Coventry and Warwickshire as a whole as the net migration for the area may need to increase relative to that modelled in the recent ONS data (Table 2). This differs to the Experian

data that was used in the Joint SHMA (2013) however, which identified the housing needs based on the economic growth forecasts were very similar to the demographic based projections, especially in relation to Coventry and the HMA as a whole. From a Coventry perspective the projections in the SHMA Annex based on the SEP forecasts actually suggest a downward pressure on housing need requirements with greater upward pressure in Warwickshire. This is however again reflective of recent development trends within the city and a movement of employment opportunities away from the core urban area and towards the fringes of the city.

8. Coventry's Green Belt

The general extent of the Coventry Green Belt was identified in the West Midlands Structure Plan (1982). It was then modified in 1986 with detailed boundaries defined in the Coventry Green Belt plan (1988) and reissued in the Unitary Development Plan (1993). The 2001 plan released three small areas of land from the Green Belt to facilitate jobs growth at ProLogis Park (Keresley), Whitley Park and Browns Lane, although the latter has not been progressed. Other than these three small amendments there have been no incursions into the Green Belt since the boundaries were modified in 1986 (excluding a minimal number of acceptable developments allowed by national guidance). In the meantime Coventry's housing and employment needs have been met, largely within the existing urban area on previously developed land.

Section 9 of the NPPF however instructs Local Authorities to review their Green Belt boundaries and determine if they require adjustment to support sustainable development within their area. As stated previously Green Belt designations are a strategic issue, that cross administrative boundaries, as such a Joint Review of Green Belt boundaries has been commissioned by the six Coventry and Warwickshire authorities. The findings of this study, alongside additional environmental and infrastructure evidence, will help to inform the final preparation of Green Belt boundaries for Coventry.

All new developments in Coventry are subject to appropriate high standards of both urban and landscape design and the principles of sustainable development, something that this plan will strengthen as it evolves. Should land

currently within the Green Belt or situated in close proximity to the Green Belt come under pressure for development however these principles of design and sustainable development will be of even greater importance. This will ensure that the characteristics of the local area are identified and reflected and that any new developments are accessible to a range of services and facilities, helping to create sustainable communities.

Prior to the adoption of the new Local Plan, which will contain the final Green Belt boundaries, development proposals that sit within the Green Belt will continue to be considered against the relevant policies contained within the 2001 Coventry Development Plan and the NPPF.

9. Options for Meeting Housing Need

In addition to considering how many homes are required, the Local Plan must also consider where new homes would be built. As part of this process this paper has drawn on significant amounts of consultation with local communities and key stakeholders over the last 10 years and presents three possible scenarios for delivering housing need within and potentially outside of Coventry. For the purposes of this paper these scenarios are presented in broad terms as opposed to specific sites, although more detail of specific site opportunities are set out in the Draft Strategic Housing Land Availability Assessment (SHLAA). Scenarios 1 and 2 are presented as extreme positions, or polar opposites, and have again been drawn from consistent consultation responses received to previous versions of the Local Plan (or Core Strategy as it was known) dating back as far as 2004 but as recent as 2012. Scenario 3 is presented as the Council's preferred approach and is considered a sustainable, deliverable and justified approach to meeting Coventry's housing needs. The three scenarios can be summarised as follows:

- 1. Protect the Green Belt.** This would constrain the amount of homes that would be built in Coventry by only planning for the amount of homes that could be accommodated within the existing urban area, with the vast majority on brownfield land. This would deliver up to 16,500 homes in Coventry with the remaining housing need redistributed to Warwickshire, outside of the Coventry Green Belt.

2. **Building within the boundary.** This would see the city ensure all of its housing need was met within its own boundary regardless of the amount. Although evidence would be used to protect the most sensitive and valuable Greenfield and Green Belt land, it is possible that negative impacts would be generated with regards to landscape character, environmental impact and effect on the Green Belt.
3. **Sustainable growth.** This would see Coventry accommodate as much growth as possible within its own boundary, including on its least sensitive and 'valuable' Greenfield and Green Belt land, and then working with Warwickshire authorities to accommodate the remaining need in the most appropriate and sustainable way. This would be heavily dependent on the outcomes of the Joint Green Belt review and other relevant evidence.

10. Community and Stakeholder Engagement

This paper provides the next step in delivering a new Local Plan for Coventry. Although its principle focus is to consider how the city's housing needs will be met between 2011 and 2031 it also provides a baseline for other areas of policy. As such, it contains a number of summary notes, which provide an overview of key policy areas. These summary notes will provide the basis for developing new policies in the Local plan and are largely unaffected by the quantum or spatial distribution of growth. This period of community and stakeholder engagement welcomes thoughts and comments on each of these sections with a view to helping finalise policy and evidence.

Community and stakeholder engagement will be undertaken in accordance with the Council's adopted Statement of Community Involvement (SCI).

It will begin on Friday 12 September 2014, and run for seven weeks until Friday 31 October 2014.

As part of the process specific events will be held across the city with local communities and key stakeholders to help the Council understand areas of support and challenge in order to shape the next stage of the Local Plan.

A Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) has been undertaken, and has been used to help shape this paper and its proposals. It is available to view as part of the supporting documents released by the Council that relate to this period of engagement on the new Local Plan.

All responses should be submitted to the Council by 5pm on 31 October 2014 and should preferably be submitted via email to:
localplan@coventry.gov.uk

Alternatively responses can be submitted to the following address:

Coventry City Council Planning Policy Department
Floor 3, Civic Centre 4
Much Park Street,
Coventry
CV1 2PY

Key Events Leading to the Current Local Plan Position

Development of the new Local Plan for Coventry has been ongoing for some time, with numerous delays due largely to no fault of the Council. Changing national guidance and the removal of regional strategies have all added significant delays to the process. Notwithstanding, the Council has undertaken numerous consultation exercises in recent years, which all provide an invaluable library of evidence, views and commentary which help support the development of the new Local Plan.

The existing Coventry Development Plan was adopted in 2001, with the Regional Plan adopted in 2004. In response to the Regional Plan update and move towards Regional Spatial Strategies and Local Development Frameworks, Coventry City Council started work on its first Core Strategy document in 2004 with the first consultation in 2006. The story can be read as follows:

May 2006 Core Strategy Issues & Option

14,800 homes 2001 – 2021
Regional plan target for Coventry.
No Green Belt

Dec 2007 Regional Plan Preferred Option

Draft Regional Spatial Strategy published - 33,500 homes for Coventry, in and immediately adjacent to the city. Green Belt land required to meet growth.

March - June 2009 Core Strategy

Identifies 33,500 homes for Coventry, includes Green Belt for housing, most notably at Keresley.

Nov 2009 Regional Plan reports

Regional Plan endorses growth corridor from Leamington/ Warwick, Coventry, Bedworth to Nuneaton. Endorses 33,500 homes for Coventry, with 3,500 in each of Warwick DC and Nuneaton & Bedworth BC

July 2007 Core Strategy: The Options

In response to increased population projections and a review of Regional planning, the Council considered three growth options:

- 19,000
- 24,400
- 44,00

Nov 2008 Emerging Core Strategy

Considered four options for growth, including outward expansion in Coventry, and outward expansion into Warwickshire. Development options identified at Keresley and Upper Eastern Green.

June 2009 Regional Plan Examination

Identifies 33,500 homes for Coventry. Specific mention of Warwick DC and Nuneaton & Bedworth BC accepting 3,500 homes each

May 2010
Core Strategy reports

“sound” plan, allocates all of the land at Keresley for housing. Includes 3,500 homes in each of Warwick DC and Nuneaton & Bedworth BC

Nov/Dec 2009
Core Strategy Examination

Nuneaton & Bedworth BC withdraws support for its 3,500 homes immediately adjacent to Coventry

Sep 2011
Proposed Core Strategy

Consultation on development strategy with no Green Belt Development. No formal growth target identified.

July 2010

Following announcement of Localism and intention to revoke Regional Plans the City Council resolves not to pursue the 2009/2010 Coventry Core Strategy and to resist Green Belt / greenfield housing development.

Jul – October 2012
Proposed Submission Core Strategy

Economic Growth projection (option 2, 11,373 homes) identified as the housing target, no Green Belt housing proposed.

Mar 2012
Housing Numbers consultation

Three options put forward in response to Coventry Housing Needs Assessment

- past trends (9,690 homes),
- Economic Growth based projection (11,373 homes), and
- ONS projection (20,655, which would require Green Belt release).

Feb 2013
Inspector’s conclusion

Coventry Core Strategy fails the Duty to Co-operate. Inspector says that Coventry and Warwickshire as a whole has to prepare a joint housing numbers study for anyone to be able to have a new Local Plan.

Dec 2012/Jan 2013
Core Strategy Examination

Nuneaton & Bedworth BC opposes plan on the basis that the housing target might be too low.

May 2014

Joint Committee endorses the Duty to Co-operate approach that will deliver between 3,750 and 3,800 homes a year across Coventry and Warwickshire.

Nov 2013

Housing numbers study published: identifying need for 1,180 homes a year in Coventry between 2011 and 2031 (23,600 in total).

June 2014

New population projections published by the ONS. The total growth in population for Coventry and Warwickshire projected in the Joint Housing Numbers Study increases by around 4% compared to the Joint SHMA.

May 2014

Joint Committee agrees in principle to the commissioning of a Joint Green Belt Review for Coventry and Warwickshire.

September 2014 New Local Plan – Delivering Sustainable Growth

Set out a number of growth scenarios, including the Council preferred approach to sustainable development within Coventry. Identifies two levels of growth for Coventry (23,600 and 36,220). Growth linked to needs of Coventry and Warwickshire as a whole.

August 2014

Annex to the Housing numbers study completed, identifying a need for 1,811 homes a year for Coventry between 2011 and 2031 (36,220 in total). Based on new ONS population projections.

Having reviewed the story of where we have been, we can now look forward to where we will go after this round of consultation.

Stage of Local Plan	Timeframe
CIL Preliminary Draft Charging Schedule and City Centre Area Action Plan (AAP) Issued for Public Consultation	February 2015
Publication Drafts of Local Plan and City Centre AAP alongside the CIL Draft Charging schedule issued for period of Representations	July 2015
Documents submitted to the Secretary of State	September / October 2015
Public Examination	December 2015
Receipt of Inspector's Report	February / March 2016
Adoption of Local Plan, City Centre AAP and CIL Charging schedule	May 2016

3. Facilitating Sustainable Growth

It is part of the Council's vision for the city to facilitate the growth of the local economy and to provide for the growth of, and changes within, the local population. This approach is consistent with national policy which requires the Local Plan to include strategic policies to deliver the homes and jobs needed in the area and to support economic growth by planning proactively to meet the

development needs of businesses and to support an economy fit for the 21st century. Providing land for business to grow or relocate to the city is a key component of proactive planning. In doing this, this Plan seeks to maintain a balance between the number of jobs in the city and the working age population and boosting economic development and the supply of jobs.

Draft Sustainable Development Policy

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, including:

- access to a variety of high quality green and blue spaces
- access to job opportunities
- low and wherever possible, zero carbon homes
- use of low carbon, renewable and energy efficient technologies
- the creation of mixed sustainable communities through a variety of dwelling types, sizes, tenures and range of community facilities
- increased health, wellbeing and quality of life
- measures to adapt to the impacts of climate change
- access to sustainable modes of transport
- preservation and enhancement of the historic environment
- sustainable waste management.

Planning applications that accord with the policies in the Coventry Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.

This will take into account:

- Any adverse impacts of granting permission that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework that indicate that development should be restricted.

4. Duty to Co-operate

The Duty to Co-operate is a legal test that requires co-operation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans.

The duty to co-operate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The Duty to Co-operate is not a duty to agree. Co-operation should produce effective and deliverable policies on strategic cross-boundary matters. If another authority will not co-operate this should not prevent the authority bringing forward a Local Plan and submitting it for examination. However, the authority will need to submit comprehensive and robust evidence of the efforts it has made to co-operate and any outcomes achieved and this will be thoroughly tested at the examination.

Given Coventry's geographical location between the county of Warwickshire and the West Midlands Metropolitan area, the city has a duty to co-operate with the following local authorities:

- Nuneaton and Bedworth Borough Council
- North Warwickshire Borough Council
- Warwick District Council
- Rugby Borough Council
- Stratford on Avon District Council
- Birmingham City Council
- Solihull Metropolitan Borough Council

- Walsall Metropolitan Borough Council
- Sandwell Metropolitan Borough Council
- Wolverhampton City Council
- Dudley Metropolitan Borough Council
- Warwickshire County Council.

In addition to Local Planning Authorities, other public bodies and organisations are subject to the Duty to Co-operate. These bodies are:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (English Heritage)
- Natural England
- the Civil Aviation Authority
- the Homes and Communities Agency
- each clinical commissioning group established under section 14D of the National Health Service Act 2006
- the National Health Service Commissioning Board
- the Office of Rail Regulation
- each Integrated Transport Authority
- The Local Enterprise Partnership (LEP) and Local Nature Partnership (LNP)

These organisations are required to co-operate with local authorities and the other prescribed bodies. These bodies play a key role in delivering local aspirations, and co-operation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross-boundary matters.

Duty to Co-operate Policies

Coventry City Council will work with neighbouring authorities to prepare joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. CCC will continue to be proactive in this regard and will seek to co-operate with all partners on an on going basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.

CCC will continue to work with its neighbours to meet the housing needs of the Strategic Housing Market Area in a proportionate and sustainable manner which provides decent and affordable homes for all in the right location, whilst having regard to other factors such as the environment and infrastructure.

Where sites cross or are adjacent to administrative boundaries, CCC will continue to work proactively and on an on going basis with all partners to enable the delivery of housing on these sites

CCC is committed to supporting the economic growth objectives of the sub-region and, in partnership with the LEP will continue to work pro-actively will all partners to deliver economic growth and prosperity across Coventry and Warwickshire.

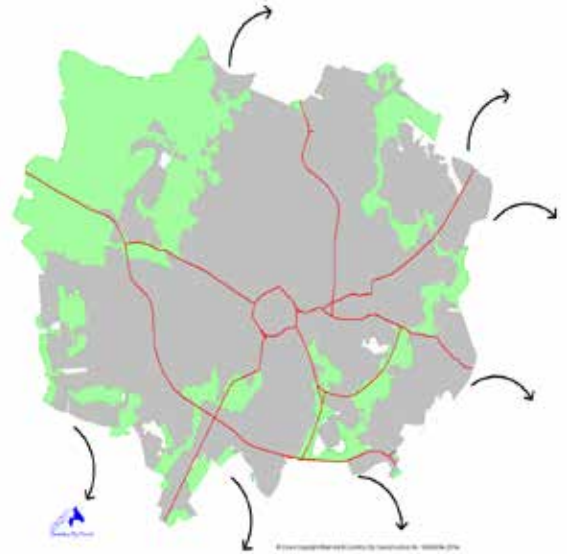
Should the need arise, and should it be considered appropriate, CCC is committed to working with partners on preparing joint development plan documents, supplementary planning documents and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.

SCENARIO 1 – Protecting the Green Belt

Housing Distribution

Initial analysis of possible housing land through the SHLAA suggests around 16,500 new homes can be delivered within the existing urban area, with around 80% of this on brownfield land. This would mean no amendment of Green Belt boundaries within Coventry.

Instead it would mean the remaining homes required to meet Coventry’s housing need would be accommodated on non-Green Belt land in Warwickshire (the wider housing market area), subject to the Duty to Co-operate process and acceptance by neighbouring authorities.



The above arrows are purely indicative and do not represent finalised directions of growth.

BENEFITS and OPPORTUNITIES	RISKS and IMPACTS
<ol style="list-style-type: none"> 1. Greenfield and Green Belt sites will be protected from development with the focus on urban regeneration and renaissance through the redevelopment of Previously Developed Land. 2. Existing vacant and derelict land within the urban area will be regenerated and brought back into active use, subject to a robust phasing policy. 3. Development within the existing urban area will bring an increased number of people closer to existing services, facilities and employment opportunities, reducing the need to travel longer distances. This will also improve the viability of existing services. 4. A reduced need to travel will promote increased levels of walking, cycling and use of public transport. This will contribute towards reduced carbon emissions and improve the urban environment. This will have a positive effect on public health and wellbeing. 5. The level of development is likely to be deliverable and achievable for Coventry as it is reflective of long term development trends covering periods of growth and decline. 	<ol style="list-style-type: none"> 1. The identified requirement is reflective of urban capacity and is constrained by Green Belt policy. As such the level of supply identified in the draft SHLAA is at its maximum with little or no flexibility. 2. This will limit choice and opportunity within the housing market, especially with certain parts of the city where few urban sites exist. 3. A lack of flexibility in supply is likely to put pressures on densities, limiting opportunities for new green spaces. 4. The requirement is lower than the identified need. This would lead to higher levels of migration to Warwickshire and could result in a ‘real’ decline in the city’s population. 5. Increased migration could result in an increase in the need to travel, especially for employment purposes. 6. There is a risk that new homes, employment, retail and leisure opportunities will be developed outside of the city. This could see investment diverted elsewhere and put at risk the city centre regeneration strategy. 7. The City Council would have very little, if any, control over where the remainder of its housing need is developed. <p style="text-align: right;">continued</p>

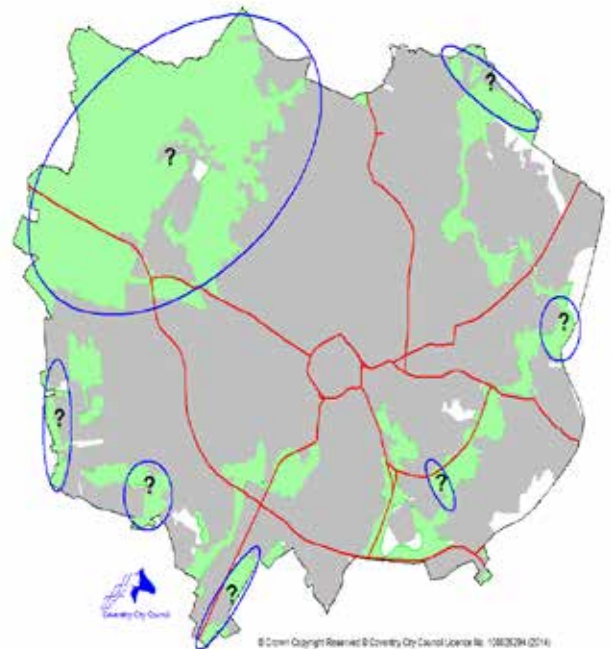
6. Social and community infrastructure funding can be grouped and focused into growth and regeneration areas, where development is most common.
7. There are opportunities through the Duty to Co-operate to support the delivery of Coventry's housing needs through partnership working with neighbouring authorities.

8. Significant pressure will be placed on urban land for development. This may increase pressure on employment sites to be redeveloped for housing, meaning local employers could leave the city for cheaper sites elsewhere.
9. A constrained housing land supply will limit opportunities to provide the types of homes 'needed' by Coventrians, including affordable homes of all types, sizes and tenures.
10. The city's Warwickshire neighbours may refuse to provide the city's housing needs, without the city having considered all land opportunities available to it.

SCENARIO 2 – Building within the Boundary

Housing Distribution

Initial analysis of possible housing land through the SHLAA suggests around 16,500 new homes can be delivered within the existing urban area, with around 80% of this on brownfield land. This option would, therefore, mean changes to the city's Green Belt boundaries to accommodate the remaining homes required to meet Coventry's housing need. The map (right) provides an initial idea of where these boundaries could be changed to accommodate the identified housing need. It is likely, however, that this would include loss of land considered high in environmental quality or rich in historic character. It would not, however, mean the loss of all Green Belt land.



Areas of consideration may overlap the city boundary. This is not necessarily reflective of site opportunities but reflects the shape of the polygon for means of presentation. The areas of consideration in relation to this plan solely reflect land within Coventry's administrative boundary.

1. Existing vacant and derelict land within the urban area will be regenerated and brought back into active use, subject to a robust phasing policy. The release of 'green' land would not prevent brownfield land from being developed over the plan period.
2. The level of development will promote choice and opportunity within the housing market and in all parts of the city. This would allow some diversification of the city's housing stock over the course of the plan period.

1. Greenfield and Green Belt sites will be required for development, but could be subject to phasing to support urban regeneration.
2. By delivering all of Coventry's needs within its own area there may be a loss of higher value environmental or historical landscapes. As such, some land released for housing may not represent the most sustainable housing land options.

continued

BENEFITS and OPPORTUNITIES

3. A flexible and varied housing land supply would also reduce pressure on urban employment sites to convert to housing, helping to retain employers and jobs within the city.
4. A varied and flexible supply of housing land presents opportunities to build larger, higher value homes that are attractive to new businesses and inward investment. A larger number of homes across different parts of the city presents greater opportunities for more affordable homes of different types, sizes, tenures and locations.
5. Development within the existing urban area will bring an increased number of people closer to existing services, facilities and employment opportunities, reducing the need to travel longer distances. This will also improve the viability of existing services.
6. Expansions of the urban area will provide opportunities for new infrastructure and community facilities, whilst also presenting opportunities to enhance existing provisions
7. A reduced need to travel will promote increased levels of walking, cycling and use of public transport. This will contribute towards reduced carbon emissions and improve the urban environment. This will have a positive effect on public health and wellbeing.
8. The level of development is likely to be challenging but deliverable and achievable for Coventry as it is reflective of housing

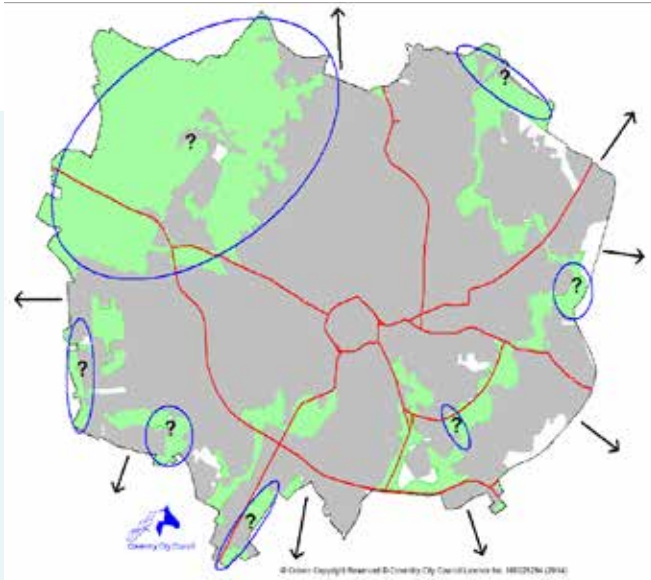
RISKS and IMPACTS

3. Higher levels of growth represent an increase on past development trends, placing greater reliance on private sector delivery at a time of limited grant funding to support third sector developments. This could place pressure on the deliverability of the requirement and the achievability of the overall strategy.
4. At a time of uncertain levels of population growth, a requirement at this level could risk over allocation of land, which may compromise urban regeneration.
5. Delivering the infrastructure to support urban extensions would be challenging. However, a plan-led approach could help mitigate these risks and support adequate provisions.

SCENARIO 3 – Sustainable Growth

Housing Distribution

Initial analysis of possible housing land through the SHLAA suggests around 16,500 new homes can be delivered within the existing urban area, with around 80% of this on brownfield land. This option would, therefore, mean changes to the city's Green Belt boundaries to accommodate homes required to meet Coventry's housing need. The map (right) provides an initial idea of where these boundaries could be changed to accommodate some of these homes. It is unlikely, however, that all of these homes could be provided in Coventry once regard is given to sustainable development, historical landscapes and environmental quality etc. meaning a relatively small proportion would need to be provided within Warwickshire. Although other land options technically exist within Coventry



these have constraints and are unlikely to be deliverable in this plan period. Initial evidence therefore suggests more sustainable options may exist adjacent to the city's boundary instead of within it.

BENEFITS and OPPORTUNITIES

1. Existing vacant and derelict land within the urban area will be regenerated and brought back into active use, subject to a robust phasing policy. The release of 'green' land would not prevent brownfield land from being developed over the plan period.
2. The level of development will promote choice and opportunity within the housing market and in all parts of the city. This would allow some diversification of the city's housing stock over the course of the plan period.
3. A flexible and varied housing land supply would also reduce pressure on urban employment sites to convert to housing, helping to retain employers and jobs within the city.
4. A varied and flexible supply of housing land presents opportunities to build larger, higher value homes that are attractive to new businesses and inward investment.

RISKS and IMPACTS

1. Greenfield and Green Belt sites will be required for development but could be subject to phasing to support urban regeneration.
2. Higher levels of growth represent an increase on past development trends, placing greater reliance on private sector delivery at a time of limited grant funding to support third sector developments. This could place pressure on the deliverability of the requirement and the achievability of the overall strategy.
3. At a time of uncertain levels of population growth, a requirement at this level could risk over allocation of land, which may compromise urban regeneration.
4. Delivering the infrastructure to support urban extensions would be challenging. However, a plan-led approach could help mitigate these risks and support adequate provisions.

continued

5. A larger number of homes across different parts of the city presents greater opportunities for more affordable homes of different types, sizes, tenures and locations.
 6. Development within the existing urban area will bring an increased number of people closer to existing services, facilities and employment opportunities, reducing the need to travel longer distances. This will also improve the viability of existing services.
 7. Expansions of the urban area will provide opportunities for new infrastructure and community facilities, whilst also presenting opportunities to enhance existing provisions
 8. A reduced need to travel will promote increased levels of walking, cycling and use of public transport. This will contribute towards reduced carbon emissions and improve the urban environment. This will have a positive effect on public health and wellbeing.
 9. The level of development is likely to be challenging but deliverable and achievable for Coventry as it is reflective of housing trends previously seen in the city during periods of economic growth and prosperity.
 10. Social and community infrastructure funding can be grouped and focused into growth and regeneration areas, where development is most common.
5. Although the impacts of exporting some housing need to Warwickshire are less than in option 1, some of the risks remain. The city would lose control over where these homes would be built and would be dependent on our neighbours to support the delivery of the plan.

EMPLOYMENT AND ECONOMIC GROWTH POLICY

Background

This chapter provides an overview of the policy options relating to employment and economic growth. Since the 1970s Coventry's economic base has been moving away from manufacturing (55% of jobs in the 1970s to 14% now) and towards services and distribution. This trend has driven changing needs for employment land and premises, including the recycling of large factories to new employment uses and new homes. The city's employment base now has a strong reliance on local government, the University Hospital and the two universities. However, new employment resulting from new technology, notably "green" technology and advanced manufacturing, offers an opportunity to increase and diversify the city's economic base in the future.

Evidence Base

- Review of existing employment sites and premises (2012)
- Research & Strategy Team "Coventry's Economy 1976 to 2026" (2009)
- Coventry's Economy: Employment Land Requirements Update (2012)
- Coventry and Warwickshire Employment Land Study (2014 – in preparation)
- West Midlands Strategic Employment Sites Study (2014 – in preparation)

Key Challenges and Opportunities

- A balanced, mixed economy will require the retention of the city's best employment sites
- Current unemployment levels are high and need to be reduced
- An adequate supply of employment land is needed to prevent net out-migration and out-commuting, whilst attracting inward investment.
- Around half of the new jobs created in Coventry are expected within the city centre
- The two universities offer excellent opportunities for employment growth and innovative technologies
- It is important that existing headquarters operations within the city are retained.



POLICY APPROACHES

Overarching Employment Strategy

To promote economic growth and prosperity it will be vital to maintain a balanced local economy and maximise employment opportunities. This will include:

- focusing office, retail and leisure-based employment developments within the city centre
- supporting the growth aspirations of both the city's universities and University Hospital
- protecting the city's best employment sites from redevelopment for other uses
- retaining the city's existing headquarters
- ensuring large scale logistics are provided in the most suitable locations
- maintaining a minimum reservoir of readily available employment land.

The Minimum five year Reservoir

This approach has worked well and generally been supported through previous versions of the plan. The exact details of this reservoir will be developed through an assessment of employment land requirements, but as a minimum it is expected to be above the 30ha previously considered.

Providing New Offices

New office developments will be focused within the city centre. The Council has granted permission for a new office quarter around Coventry Train Station and this will support this approach.

Redevelopment of Existing Employment Sites

Proposals for redevelopment of employment sites to other uses will generally be resisted, especially on the city's best quality employment land and when it relates to headquarters. Assessments will however be made against a range of criteria, including viability, market attractiveness, the site's contribution to employment land needs, physical suitability, relationship to neighbouring uses and access to public transport.

Mixed Use Redevelopment of Employment Sites

Employment land needs are changing and in some cases alternative uses are required to facilitate a redevelopment of existing employment sites. This will require the applicant to demonstrate such an approach is necessary to promote viability. Normally no more than 50% of the site area shall be for residential use.



Storage and Distribution

Large scale provision (normally in excess of 4,000sq.m) will not normally be acceptable within the existing urban area due to the need for large vehicle movements and unsociable operating hours. As such, large storage and distribution schemes will be focused on Regional Investment Sites or existing business parks on the edge of the city. Small scale storage and distribution development will be permitted, provided that the site is located on a primary route and is easily accessible by a range of transport.



Future Opportunities

- Continue to explore cross-boundary approaches to large scale employment opportunities.
- Seek to define a new minimum reservoir to meet the employment needs of Coventry.
- Continue to promote a diversification of the city's employment capabilities in accordance with the LEP and SEP priorities.

WIDER HOUSING POLICY

Background

This chapter provides an overview of the policy options relating to wider housing issues, which are not necessarily affected by different locations of growth. It will consider issues around accessibility, density and affordable housing, as well as housing provision for older people, gypsies and travellers and students.

Key Challenges and Opportunities

- Creating balanced communities
- Delivering high quality homes to meet housing need
- Diversifying the city's existing housing stock
- Building the right homes in the right places
- Ensuring suitable accessibility to key services
- Providing adequate and suitable homes to support economic growth and healthy communities
- Encouraging high quality purpose-built student accommodation to reduce a loss of family homes to HIMOs

Evidence Base

- C&W Joint SHMA (2013/14)
- Coventry SHMA (2012)
- Affordable Housing Viability Assessment (2012)
- Strategic Housing Land Availability Assessment (2014)
- Joint Gypsy and Traveller Accommodation Needs Assessment (2008)
- Coventry's Older Peoples Strategy (2007)
- Housing Information Technical Support Paper (2014)
- Coventry's Housing Strategy (2012)

POLICY APPROACHES

Managing the Existing Stock:

More than 85% of homes that will exist in Coventry in 2031 are already built. This emphasises the importance of considering the city's existing stock and that policy encourages improvements where necessary and allows for demolition or conversion where appropriate.

Delivering New Homes:

Regardless of number or location, it is essential that all new homes are situated in appropriate proximity to key services and facilities. Policy will retain a focus on previously developed land and urban regeneration but will ensure these aims are balanced with the ability to meet the city's housing needs. A flexible and balanced portfolio of housing sites, managed through the SHLAA, will ensure a five year housing land supply is maintained at all times. Homes should be built to adequate size standards to reflect housing needs. Opportunities for build to rent proposals will be supported in principle, especially within the city centre.



Affordable Housing: The new Local Plan is committed to meeting the housing needs of Coventrians who are unable to access market housing. This will be undertaken in accordance with the definition of Affordable Housing in the NPPF, and have full regard to development viability. The Coventry SHMA is clear that affordable housing needs vary across the city and policy will look to reflect these differences in order to promote urban regeneration and viable development opportunities, whilst providing the right homes at the right tenures in the right locations.

Student Housing: The city's two universities have grown substantially in recent years and are excellent examples of economic and educational success within Coventry. The growth of the city's universities however has placed pressure on the city's housing stock which needs to be addressed, whilst continuing to support both universities' growth plans. As a result policy will promote purpose-built student housing, especially close to the universities, whilst the continued growth of HiMOs will be closely monitored. Article 4 directions may be implemented in relation to HiMOs in certain parts of the city if evidence supports their use.

Gypsy and Traveller Sites: A review of accommodation needs associated with the Gypsy and Traveller communities in Coventry is currently underway. Previous studies have identified the need to refurbish the existing site at Siskin Drive, and this is to be delivered through grant funding secured from the HCA. The new Local Plan will look to meet the needs of this community in response to the updated evidence base. There is also a need to monitor illegal encampments and requirements for temporary stopping places.



Care Homes, Nursing Homes and Older Persons Housing: Primarily as a result of improved life expectancy the number of people aged over 60 is expected to increase substantially up to 2031. This will place pressure on the city's housing stock and will continue to produce a need to deliver older persons' housing and homes built to lifetime standards. It is also expected to place pressure on specialist housing provision linked to varying levels of care. It is clear that such provision helps meet housing needs, and this has been recognised in National Guidance. As such, older persons' housing provision will count towards the city's housing land requirement, and will be closely monitored.



Residential Density: The NPPF encourages local density requirements. In response to this, the Council will seek to make the most efficient use of land, whilst ensuring the housing needs of the city are met in the most sustainable way. This will include making onsite provision for green infrastructure. Previous policy has encouraged a minimum of 30 dwellings per hectare and this is expected to remain, increasing to a minimum of 100 dwellings per hectare inside the Ring Road, unless proposals create a negative aspect on the views of the three spires and other aspects of urban design.

Future Opportunities

- Explore options and evidence for introducing Article 4 Directions on HiMOs.
- Update the Council's Affordable Housing Supplementary Planning Document.
- Explore opportunities for Area Action Plans to support the delivery of larger housing schemes.

WIDER SHOPPING AND CENTRES POLICY

Background

This chapter introduces the policy options that exist around wider retail and centre issues. It establishes the city centre as the primary focus for new retail and leisure investment, with a network of centres sitting below it. As such, a centres first policy continues to be promoted across Coventry.

Key Challenges and Opportunities

- maintaining a hierarchy of centres
- ensuring the city centre continues to be the focus for retailing and leisure activities
- continuing to enhance the retail offer across the city
- maintaining a shopping offer which caters for all
- providing appropriate shops, facilities and services in sustainable locations
- where necessary enabling centres to change to meet future needs and demands

Evidence Base

- The Coventry Shopping and Centres study 2014
- The Coventry Shopping and Centres Study 2006, updated in 2008.
- Coventry assessment of Local Centres
- (2012)Annual Monitoring Report

Provision of New Retail and Town Centre Uses

New retail and town centre uses shall be required to locate in a defined centre in line with the established hierarchy. A sequential assessment and where thresholds apply, an impact assessment shall be required for proposals outside a defined centre. The threshold used for assessing sequentially preferable sites and for the impact of proposals on existing centres will be established following the findings of the Shopping and Centres Study 2014. However, the levels are expected to be below the thresholds set out in the NPPF.

POLICY APPROACHES

The Network of Centres

A network of centres will be maintained below the city centre which are of an appropriate scale and have an appropriate offer for their location, size and catchment. The network (or hierarchy) will include: major district centres, district centres and local centres. These will be the preferred locations for new shops, services and other uses which do not serve a city-wide catchment.



Proposals Outside Designated Centres

There are a variety of shops and services in the city which are not located in a defined centre. Centres are generally the focus for retail, service, and leisure uses. However, it is recognised that there is existing provision outside defined centres and whilst not the preferred location for shopping and associated leisure activities, there may be occasions when proposals for uses outside defined centres are considered suitable. This will only be the case where it has been clearly evidenced that there are no sequentially preferable sites and that the impact of a scheme is not harmful to existing uses.

Well-established Local Shopping Parades

Although these areas of provision are not designated centres they are recognised as being well-established local shopping parades, which generally serve the immediate locality, primarily for "top-up" convenience shopping, limited services and limited small-scale food and drink uses.



Restaurants, Bars and Hot Food Takeaways

Food and drink uses in classes A3, A4 and A5 have the potential to cause significant problems, with impact upon residential amenity, highways and parking. For a combination of these reasons, they will normally only be supported within defined centres (including Local Centres) and employment areas where residential amenity is less likely to be an issue and will be resisted elsewhere. Consideration will be given to Public Health with regard to the concentration and mix of uses.

City Centre

The city centre will continue to be developed to make it a showcase for the city. The detailed policy basis for the city centre will be contained in a supporting Area Action Plan

This means promoting, encouraging and supporting:

- high quality, legible environments and designs
- recognition, preservation and enhancement of heritage and protection of key views of the three spires
- vital, viable and growing shops, services, cultural facilities and leisure attractions
- central employment locations
- a variety of places to live
- accessibility for all
- activities around the clock

Future Opportunities

- Explore opportunities for amending centre boundaries
- Consider the creation of new centres, or the removal/replacement of existing centres
- Explore new forms of retailing and leisure facilities

SOCIAL COMMUNITY AND AND NEIGHBOURHOOD

Background

This chapter introduces the policy options that exist around wider social and community issues across Coventry. Of key importance is maintaining accessibility to facilities and services by a range of transport means. The Local Plan will also ensure adequate provisions are retained throughout the city and new and improved services introduced.

Evidence Base

- Willenhall Neighbourhood Plan
- Annual Monitoring Report
- Analysis of Coventry social and Community uses (2014)

Key Challenges and Opportunities

- maintaining a range of facilities across the city
- ensuring the city centre continues to be the focus for major community and social facilities
- maintaining a range of facilities which cater for all
- providing appropriate facilities and services in sustainable locations
- utilising grant funding and infrastructure contributions to enhance existing facilities and introduce new provisions



Accessibility of Local Community Facilities

It is important to ensure that local people have good access to a range of community facilities. It is particularly important to maintain a range of facilities which are easily accessible to all by walking, cycling and by public transport. As such social and community facilities will usually be directed towards designated centres.

POLICY APPROACHES

City Centre

The city centre will be a focus for social, community, leisure and entertainment opportunities given its excellent accessibility and profile. This will be supported by an Area Action Plan, which will identify opportunities to create more areas for leisure, recreation, tourism and events, further public realm improvements and support for Coventry's most popular tourist attractions such as the cathedrals, SkyDome, Herbert Art Gallery and Transport Museum. Opportunities will also be pursued to enhance the built environment through regeneration and increased housing opportunities, supporting the vitality and viability of the city centre.

Loss of provision

It is accepted that there may be circumstances where social, community and leisure facilities are lost to other uses. However any application which would result in the loss of an SCL use will be required to justify that any local need could be met through the provision of an existing facility in the locality and that the proposed new use is acceptable in that location.

Educational Facilities

Over recent years a number of new schools in Coventry have been built. Due to an ageing building stock, several schools have been granted planning permission for redevelopment in order to provide a building stock which is suitable for generations to come. Aligned with this need is the need to further enhance educational attainment in Coventry, and by providing new schools, often on existing sites, the city is set for a new era in education and learning, not only for schoolchildren, but for the communities which live near them. The redevelopment of schools and other educational facilities will generally be supported.

The creation of new schools (including free schools) will only be supported if they are located in suitable and sustainable locations. They should fit in with their surroundings and should be accessible. In general they should not be located in industrial areas, or in areas where there are traffic and parking issues.

Universities

Over recent years, both Warwick and Coventry Universities have begun to implement elements of their Masterplans. Coventry University is currently developing new sites as a number of the current buildings it operates from are in need of redevelopment. The University of Warwick is in the process of developing new academic and accommodation buildings as part of its masterplan programme. The Council will continue to work closely with both universities to ensure development is suitable, sustainable and beneficial to both the universities and the city.

Places of Worship

In recent years, Coventry has seen a change in the provision of places of worship. Together with the traditional locations and buildings that all faiths have used, there has been a move towards the re-use of buildings in locations not normally associated with places of worship. Whilst the Council encourages the establishment of new places of worship, they should, wherever possible, be located in suitable and sustainable locations, which can include, but are not limited to, designated centres. New proposals would also be considered based on:

- the compatibility of neighbouring uses
- parking and access, including sustainable modes of travel
- compatibility with other Local Plan policies.



New Social and Community provisions

New facilities often fall within the category of 'town centre uses'. As such, they are to be directed towards designated centres and will be considered against a sequential assessment. This will help ensure adequate parking provision, accessibility by a range of transport and opportunities for linked trips.

Future Opportunities

- Explore opportunities for enhancing social, community and leisure facilities throughout the city
- Explore new forms of social, community and leisure facilities across the city

HERITAGE POLICY

Background

This section introduces policy options relating to the protection, preservation and enhancement of Coventry's designated and non-designated heritage assets. These include Statutory Listed Buildings, Local Listed Buildings, Scheduled Monuments, Registered Parks and Gardens, Conservation Areas and non-designated heritage assets such as archaeological sites that are recorded in the Coventry Historic Environment Record (CHER).

Key Challenges and Opportunities

- continuing to preserve and enhance Coventry's historic buildings and bringing unoccupied historic buildings back into use whilst maintaining their historic integrity,
- maintaining and enhancing local character and distinctiveness,
- increasing knowledge of Coventry's past by the recording of heritage assets prior to development and making information accessible to the public.

Evidence Base

- The National Heritage List for England
- The Coventry Historic Environment Record
- The Coventry Local List
- The Coventry Historic Landscape Characterisation Project
- The Gould Report on the 20th Century City Centre
- The Arden Design Guidance
- Conservation Area Appraisals

POLICY APPROACHES

Sustainable Development

In order to help sustain historic character, sense of place, environmental quality and the local distinctiveness of Coventry, policy will seek to support development proposals where they conserve and enhance those aspects of the historic environment that are of special historic, archaeological, architectural, artistic, landscape or townscape significance.

Understanding Significance

Where proposals are likely to affect the significance of a heritage asset or its setting, in order to demonstrate an understanding of significance, policy will promote the need for Design and Access Statements and Heritage Statements using currently available evidence.



Conservation of Historic Buildings

Coventry has over 400 Listed Buildings that have been selected by the Government as being of national interest. In addition, over 500 buildings have been selected by the City Council for Local Listing due to their importance to Coventry. Policy will ensure their conservation and, where appropriate, promote their sympathetic and creative re-use, especially for those buildings that are considered to be at risk.

Design Considerations

Policy will seek to ensure that proposals that involve heritage assets, and particularly historic buildings, should acknowledge the significance of the existing building and its surroundings by means of their siting, massing, form, scale, material and detail. All proposals should sustain and reinforce special character.

Loss of Heritage Assets

Heritage assets, for example historic buildings, landscapes and archaeological sites, contribute to a location's special character and sense of place, and can be viewed as a non-renewable resource. Consequently, policy will seek to resist the demolition or destruction of heritage assets. Proposals to demolish heritage assets will need substantial justification. The benefits of demolition or destruction must significantly outweigh the loss of a heritage asset.

Recording and Interpretation of Heritage Assets

Heritage assets can be regarded as a non-renewable resource and if they undergo change, demolition or destruction the information they hold, and its ability to help us understand Coventry's past, is lost forever. Policy will focus, therefore, on ensuring that, where change to a heritage asset has been agreed, recording and interpretation will be undertaken to document the asset's archaeological, architectural or historic significance. The information gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.



Information and Advice

The provision of expert advice on all matters relating to the conservation and management of heritage assets is vital to the protection of Coventry's unique heritage assets. Policy will, therefore, seek to ensure that the Council continues to provide this advice and expertise. Policy will also seek to ensure that the evidence on which advice is based, namely the Coventry Historic Environment Record, will be maintained, up-to-date and made readily available to the public.

Future Opportunities

- produce and regularly update Conservation Area Appraisals and Management Plans for the city's 16 Conservation Areas.
- maintain and expand the Coventry Local List of Heritage Assets.
- work in partnership with other organisations to bring unoccupied historic buildings back into use.
- explore opportunities for controlling permitted development through the use of Article 4 Directions where it is felt that these rights are having a detrimental effect on the character and appearance of heritage assets.

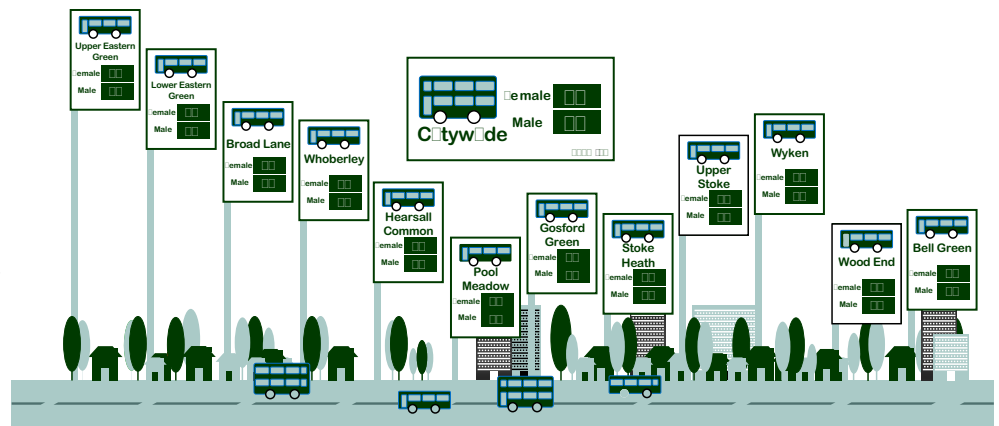
Background

Public health has been identified as a cross cutting theme across the proposed Local Plan which supports the Council’s wider agenda of “improving the health and wellbeing of all people living in Coventry.” This chapter seeks to identify the impact of the built environment on the health of Coventry’s population and provides a basis for developing the Publication Draft.

The Marmot Review identified a social gradient in health. This means that those living in the most deprived neighbourhoods die earlier and spend more time in ill health than those living in the least deprived neighbourhoods. Such health inequalities are determined by environmental conditions which negatively affect health. These conditions vary drastically across the city, with the poorer neighbourhoods being more susceptible to poor health and wellbeing.

The disparity in life expectancy across Coventry is revealed by travelling through the city by bus.

Life expectancy along Coventry Bus Route 10



Key Challenges and Opportunities

three main policy actions to tackle health inequalities are recommended by Marmot to try and ensure the built environment promotes health and reduces variation for all local populations. These are:

1. Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by:
 - improving active travel
 - improving good quality open and green spaces
 - improving the quality of food in local areas
 - improving the energy efficiency of housing
2. Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each part of the city
3. Support locally developed and evidence-based community regeneration programmes that:
 - remove barriers to community participation and action
 - reduce social isolation

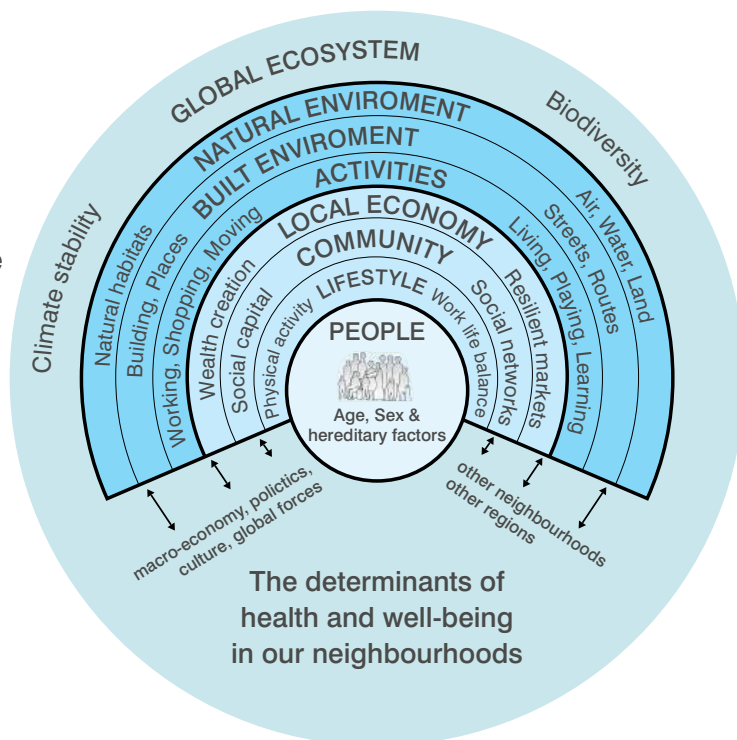
Evidence Base

- Coventry Joint Health and Wellbeing Strategy (2013)
- Coventry Joint Strategic Needs Assessment (2012)
- PHE Public Health Outcomes Framework Coventry (2014)
- PHE Health Profiles for Coventry (2013)
- ONS Excess Winter Mortality Statistics (2013)
- Indices of Multiple Deprivation (2010)
- National Child Measurement Programme (2013)

POLICY APPROACHES

Health Impact Assessments: The health and wellbeing of Coventry people can be affected by new developments and by planning policy. A Health Impact Assessment can be used to reduce adverse impacts and maximise positive impacts on health and wellbeing.

Improving Food Quality: The association between the food we eat and our health and wellbeing is well known, for example obesity specifically impacts poorer communities. It is important to protect allotments, and encourage access to healthy and affordable food, including fruit and vegetables. The concentration of hot food takeaways is higher in areas of poor health, and accordingly their locations need to be managed.



Improving Active Travel: Over 50% of Coventry’s adults do not achieve at least 150 minutes of physical activity per week. This is significantly worse than the rest of England. We need to create a network of cohesive, healthy communities and reduce the need to travel by car. Better networks for walking and cycling, such as improved cycle lanes promote active travel and provide access to services and employment. Reducing road traffic speeds brings a safer physical environment and helps to build a unified community with increased social value. Reduced traffic will lead to less noise and air pollution and increased opportunities for physical activity.

Housing: In the next 20 years we are expecting the number of people over 65 to increase disproportionately and generate specific challenges to health, housing and social care. We also know that 15.7% of households in Coventry experience fuel poverty. This plan will provide good quality suitable housing and improve the existing housing stock. New developments will also ensure space is made available for recreation and exercise.

Economy and Employment: The health of Coventry people is a key asset for the economy but the percentage of working days lost to sickness absence in Coventry is worse than the rest of England. Healthier people lead to a more productive workforce and employment can take families out of poverty. The barriers to employment include transport, low skills, childcare and poor health which can be aided by improving the built environment and the value of the community.

Open and Green Spaces: It is recognised that good quality and well maintained parks are more likely to be used, and as a result, people living nearby are more likely to report better health and wellbeing. In more deprived areas, some of our residents do not use open and green spaces due to a fear of crime and safety. Therefore, the Local Plan will need to ensure there are good play spaces, and accessible open and green spaces in new developments to encourage physical activity, social cohesion and improve mental health. Allotments will also be protected and enhanced.

Future Opportunities

- supplementary Planning Document to manage the locations of Hot Food Take Aways
- supplementary Planning Document to require Health Impact Assessments

GREEN INFRASTRUCTURE (GREEN SPACES)

Background

A high quality and well-connected green infrastructure has the potential to make Coventry a much more attractive and prosperous city and a healthier place to live, work and enjoy, with multiple benefits for the economy, the environment and people.

The long-term vision for green infrastructure in Coventry is the provision of a city-wide network of high-quality, well-managed and well-connected, multi-functional green space, delivering the widest possible range of benefits to those living, working and visiting the city.

Green Infrastructure

Green Infrastructure describes the network of green assets which includes: larger green spaces, waterways, wildlife network corridors, 'green wedges' and the green belt, agricultural land, woodlands, biodiversity and designated nature conservation sites and historic landscapes and landscape features. At a smaller scale it can also include: smaller open spaces, school grounds, playgrounds and playing fields, cemeteries, local nature conservation and biodiversity sites, allotments, city farms, private gardens, green walls and roofs, landscaped areas around buildings, as well as trees and other vegetation throughout the public realm (e.g. footways, cycle ways and public rights of way). These are important at a city-wide scale and as connectors to the wider regional network of green infrastructure.

Such provisions can work together to support sustainability and quality of life in and around the city, bringing many social, environmental and economic benefits, including:

- greater landscape and townscape quality and visual amenity
- protection and enhancements of ecology and biodiversity
- green and active travel routes
- conservation of the historic environment
- improved general physical and mental health of local communities
- opportunities for outdoor recreation and local food production
- mitigation and adaptation to climate change

Evidence Base

- Coventry Green Infrastructure Study (2008)
- Coventry Green Infrastructure Standards
- Coventry Green Space Standards
- Coventry Green Space Strategy (2008)
- Local Biodiversity Action Plan
- Historic landscape characterisation project
- Building for Life 20
- Green Infrastructure Guidance,
- Natural England (2019)

Key Challenges and Opportunities

- creating multi-functional, connected networks of green spaces with links to blue and grey infrastructure
- ensuring new and existing green infrastructure is of high quality and well maintained
- ensuring policies are sufficiently strong and clearly defined so green infrastructure (green spaces) will be treated as integral to the development planning process and to all development sites from the outset and through to the detailed design of developments and implementation.
- maximising efficient land use
- ensuring appropriate maintenance programmes and funding arrangements are in place
- protecting the most valuable environmental and historical landscapes
- enhancing the city's ecology and biodiversity
- managing the city's Green Belt boundaries

POLICY APPROACHES

Loss of Green Infrastructure (Green Spaces)

The loss of green infrastructure will generally not be supported, unless allocated through the Local Plan. Additional proposals will only be accepted where they create improved or enhanced provisions as a result of development and where the benefits genuinely outweigh the loss in the context of the Local Plan and the NPPF.

Providing New Green Infrastructure

Opportunities to provide new green infrastructure throughout the city will be essential to improving the urban environment and public health and making sure new developments are well designed. As such, they will need to be well integrated and connected into site level and city-wide green infrastructure networks.

New provisions will be made in accordance with the Coventry green space standards, with priority given to meeting existing deficiencies within the urban area. It will also be given the same weight as other forms of infrastructure through the CIL and S106 process, with opportunities for multi-functional provisions maximised.

Maintenance of Green Infrastructure

New and existing green infrastructure will need to be maintained to a very high standard. This will include local and city-wide provisions and cover all forms of green infrastructure from grass verges to parks and open spaces. Where new green spaces are created as part of new developments, then maintenance contributions will be required through developer contributions where such provisions are transferred to the Council. Alternatively the developer or subsequent management company will need to ensure these provisions are maintained to a high standard

Environmental Designations and Historic Landscapes

The city has numerous environmental designations including Local Wildlife Sites, Local Nature Reserves, Ancient Woodlands and hedgerows and SSSIs. These areas will be protected, and where possible enhanced to ensure their long term contribution to the city's green infrastructure.

The city also contains areas of historic landscape character, most notably to the north west of the city. Where possible these landscapes (especially those of the highest value) will be protected and incorporated into any development proposals that may arise.

Parks and play areas

New parks and play areas should form an integral part of new green infrastructure, whilst improvements to existing provision will also be pursued. This will need to be carefully planned in accordance with the principles of 'designing out crime'; however, this will not be allowed to undermine the environmental quality and amenity of such spaces.

Further Opportunities

- local area green space and green infrastructure plans (Design Guides and/or SPD).
- ensuring Green Infrastructure is secured on an even footing with other infrastructure through CIL.
- promoting multi-functional green spaces alongside drainage and design opportunities for example.
- promoting a Green Space Factor and/or biodiversity offsetting to promote new and improved green spaces, where loss of sites is necessary and on-site provision is undeliverable. SPD Opportunity.

URBAN & LANDSCAPE DESIGN

Background

The quality of people's lives is greatly affected by the quality of our environment, both in terms of the buildings that we use and live in and the spaces we use between buildings, including streets, squares, parks and other public and private spaces. Good design is also about creating spaces and buildings that are safe to use and move through, as well as being easy and convenient to use by all members of the community, including people with restricted mobility. National policy stresses the need to protect and create quality environments that can be achieved through following the principles of good urban design.

Evidence Base

- Coventry Urban Design Study (1999)
- Coventry Urban Design Guidance (2004)
- Coventry Green Space Strategy (2008)
- Coventry Green Infrastructure Study (2008)
- Coventry Historic Environment Record (HER) Map of Designated Heritage Sites

Key Design Criteria

The Council wants to significantly raise the standard of the built and green environment and developments will have to contribute towards the enhancement of living conditions in the city. The following criteria will underpin decisions about urban and landscape design:

- adaptability – ensuring developments can adapt to change
- character – local identity and character
- size – ensuring new homes are adequate in size and layout to meet housing needs
- continuity and enclosure – defining the enclosure of public/private spaces
- diversity – mix of uses and developments, including building types
- ease of movement – good permeability and connectivity
- legibility – recognisable routes and landmarks
- quality of the public realm – attractive, safe, useable public spaces and routes; and
- sustainability – design and layout
- longevity - endures over the lifetime of the development and building for life attributes
- green infrastructure – incorporated at the earliest stage of the design process – integrated useable and multi-functional
- historic environment – incorporate key buildings, views and landscapes as appropriate

POLICY APPROACHES

New Developments

Development is expected to occur at a variety of geographical scales and locations throughout the city. The implications for the design of such areas will be an important consideration on a more detailed or site specific basis, responding to the local physical, economic and social context, reflecting local distinctiveness and identity. Supplementary Planning Documents will continue to provide best practice policy guidance.

All development proposals will be required to achieve a high quality of design and the quality of development must always be 'good enough to approve' and this is true for small householder proposals and major development schemes.



The importance of design

A high quality environment is essential to achieving sustainable development and contributes to the economic life of a city. As towns and cities increasingly compete to attract investment, the presence of a high quality built, historic and natural environment is a vital business and marketing tool.

Public Spaces

Access to good quality, well maintained public spaces, can help to improve our physical and mental health by encouraging us to walk more, to play sport, or simply to enjoy an attractive green and natural environment. Successful places have well designed green spaces that people want to use and respect, while better management, maintenance and supervision of public spaces help to allay fears of crime and anti-social behaviour.

Environmental Quality

Environmental quality is an integral part of the public realm and a measure of civic pride. Improving environmental quality helps to shape the cultural identity of an area and provides a sense of place for local communities.

Further Opportunities

- supplementary Planning Documents will continue to provide best practice policy guidance and may be prepared in relation to specific site allocations.
- an area specific Design Framework will be promoted as part of the City Centre Area Action Plan.
- design guides will be prepared and where appropriate updated, to promote excellent design and minimum space standards for new homes.

TRANSPORT & MOVEMENT

Background

High quality transport networks are crucial to the successful development of a vibrant, liveable and economically successful city and population. This chapter sets out the key existing issues, opportunities and challenges affecting the transport and movement needs of the city over the course of the Local Plan period and details some of the key elements of the emerging strategy being developed to accommodate the city's future transport requirements.

Supporting the Economy

- for the proposed economic growth to be realised, the range and number of jobs available across the city region is increased.
- concurrently the city requires substantial numbers of new housing to meet projected demand over the Local Plan period, both to address an existing shortage and provide additional capacity to house an expanding workforce.
- it is crucial to ensure good access between new and existing areas of housing, employment opportunities and services to be delivered via a range of convenient and reliable transport modes.
- Travel opportunities should be suited to the varying types of trips people will make whether contained within local neighbourhood areas, travelling across the city region or over longer distances throughout the region and beyond.
- the transport network needs to provide for the efficient movements of goods and services and support supply chains throughout the city region whilst ensuring detrimental impacts are minimised.
- the future networks will be instrumental in removing constraints in existing areas and opening up new sites for development in order to support growth.

Relevant Policies and Evidence

- West Midlands Local Transport Plan 3
- Coventry & Warwickshire Local Enterprise Partnership
- SEP
- Coventry Transport Strategy
- Midlands Connect – June 2014

Key Challenges and Opportunities

- delivering economic growth and prosperity
- delivering new housing
- supporting growth through a better connected workforce (linking jobs and housing)
- ensuring feasible travel choices as a catalyst for increasing sustainable travel whilst allowing balanced and reasonable continued access for private vehicles
- ensuring transition to a sustainable travel hierarchy
- supporting healthy lifestyle choices
- supporting public transport

Existing Patterns

Development of the city over the past 30 years has resulted in a number of major trip attractors being located on the edge of the city, which in some cases has resulted in poor levels of accessibility and a high reliance on access by car.

Some other key features include:

- strong cross boundary commuting and business travel patterns, notably towards Nuneaton and Bedworth and Leamington
- relatively low levels of congestion but peak hour issues on some radial corridors and junctions
- high proportion of car-based work trips under 5km offering significant potential for adoption of sustainable alternatives
- increasing levels of walking and cycling over time
- significantly increasing rail travel
- good quality radial bus network but some weaknesses with off peak and more peripheral / orbital services
- decreasing road traffic accidents
- sufficient car parking capacity in the city centre, but a need to improve the quality and accessibility

Ensuring Efficient Use of Existing Infrastructure

It is essential to ensure that economic growth, development proposals and associated travel are accommodated in an effective and balanced way. Increasingly this will require the adoption of imaginative, innovative solutions to:

- make best use of existing infrastructure through network management and increased use of technology
- focus improvements to key transport networks
- assign road space to alternative uses to increase active and sustainable travel and deliver a higher quality “liveable” environment whilst simultaneously maintaining appropriate access for the car
- improve efficiency and effectiveness of public transport
- Encouraging the adoption of alternative forms of travel to car use through Smarter Choices

Lifestyle and Opportunity

In order to maximise the benefit of anticipated economic growth across the city for all citizens, the transport network promotes and supports enhancement of inclusive social structures and institutions. In addition to providing convenient access to employment opportunities, the transport network needs to support access to education and training opportunities, healthcare facilities and good quality, affordable food retail.

The transport network should facilitate and support the maintenance and enhancement of social welfare structures, providing the means by which people are able to socialise and interact, reducing isolation and supporting independent living. This is

particularly crucial for those without access to a car and / or reliant upon public transport, notably the young, elderly and mobility impaired.

The transport network should support the adoption of healthy lifestyle choices and, where feasible, incorporate active and sustainable travel behaviour as fundamental features of the built-environment. Based upon first principles of supporting walking and cycling as preferred modes of “first choice” will help establish sustainable and active travel patterns as the norm from the outset, following delivery of new development and establishment of new movement patterns across the city.

Public Transport

With proposed housing and employment development distributed across the urban area, it is crucial that the public transport network develops to support changing patterns of land use and consequently travel over time.

Existing rail infrastructure will be upgraded and enhanced to support intensification of employment activity in the city centre through developments such as Friargate and the Southern Precinct retail redevelopment. Upgrades proposed include capacity enhancement of Coventry's central station, together with new suburban stations and increased service levels within the region. In addition to supporting the economic vitality of the city centre in its own right, such enhancements will be vital to ensure capacity on the existing highway network is freed up in order to support growth and activity in more peripheral areas of Coventry and Warwickshire. This is particularly true in locations where the delivery of frequent and viable public transport services remains problematic.

Where development is scheduled in more peripheral areas and in areas not benefitting from existing rail connections, a series of high-quality rapid transit corridors will be developed over time into a core network linking major trip generators on the edge of the city locations to city centre and to each other. This 'step-change' in provision will improve accessibility and travel choices whilst also reducing pressure on the highway network.

Walking and Cycling

The compact and permeable lay-out of the city provides potential for a high proportion of trips to be made by walking and cycling.

An on going programme of investment has seen significant improvement to the walking and cycling environment, notably in the city centre, with enhanced routes currently being extended along key corridors across Coventry and Warwickshire.

This is through development of both dedicated off-road routes and enhancements of highway conditions for pedestrians and cyclists to ensure effective management of traffic speeds and enhance safety.

For short local trips to amenities, such as to schools and local shops, walking, cycling and

public transport should be developed to the point of being the most attractive modes of travel. These modes are more feasible for shorter journeys as well as being more sustainable in terms of reducing local congestion, improving air quality, reducing carbon emissions and having added health benefits.



ENVIRONMENTAL MANAGEMENT

Background

This chapter introduces the policy options that exist around wider environmental management issues. It builds upon previous consultation material and responses and seeks to set the platform from which a Local Plan Publication Draft will be produced.

Key Challenges and Opportunities

- delivering high quality sustainable development to meet local needs without compromising viability.
- aiming to achieve zero carbon homes by 2016.
- reducing NET overall land and air pollution whilst encouraging new and existing business to grow and prosper.
- mitigating and reducing flood risk to homes and businesses.

Evidence Base

- Coventry University, SUDs Technical Feasibility Report, 2012
- Coventry City Council Low Carbon Energy Study (report produced for CCC/AWM/Coventry University/ Warwick University by AECOM in 2010)
- Coventry District Energy Company, Low Carbon Heat Network for the city of Coventry, 2013
- Strategic Flood Risk Assessment Report, Halcrow, 2008
- A Review of Local Standards for the Delivery of New Homes, Local Housing Delivery Review, Harman Review, 2012

POLICY APPROACHES

Innovative building sustainability standards:

The NPPF recognises the importance of building to high environmental standards for all types of development, and to support a move to a low carbon future. Such an issue is amplified by rising fuel costs and increasing cases of fuel poverty. In Coventry this means exploring zero carbon homes and taking a creative approach in securing the improved standards relating to building control energy Regulations (Part L). The built environment remains the largest single contributor of carbon dioxide at 40% of the city's total, with homes and transport having emissions of 36% and 24% respectively. As such, new developments will need to achieve, and where viable, surpass minimum standards.

Decentralised Energy Network: The existing Heat Line infrastructure asset will be utilised to encourage future major developments to connect primarily through the obvious financial incentives, thus helping to improve the green credentials of future buildings.

Green and Blue Infrastructure: Policy will seek to ensure that such assets would be protected and enhanced alongside future development. The term green and blue infrastructure refers to a strategic network of green and blue spaces, such as woodlands, parks, amenity landscaping, ponds, canals and rivers, and the links between them. De-culverting in the city centre offers a prime example of how blue infrastructure could be introduced into the urban area. Opportunities to provide multi-functional provisions will be encouraged where practicable and viable.



Contaminated Land: Due to the city's industrial heritage there are issues with contaminated land that will need to be resolved, as appropriate through new development. New development proposals must, therefore, take appropriate steps to adequately decontaminate land, making it readily available and suitable for the developments proposed.

Reducing Carbon Dioxide Emissions: Policy will aim to recognise the Government's targets to reduce national carbon dioxide emissions by 34% (against 1990 levels) by 2020 in order to meet an 80% reduction by 2050. New development will be required to make a significant contribution towards this target. This will be achieved through recycling material, improved building techniques and improved design.

Renewable Energy Generation: Due to the lack of large open areas of space within the city, on-site and neighbourhood-scale renewable energy schemes are the most effective way for Coventry to contribute to renewable energy targets set out by government. Any local or on-site applications will therefore be encouraged. If a smaller site generating renewable heat is close to a district heating network, the developer will have the chance to feed any excess energy created into the district heating system.



Climate Change Adaptation: methods that could be achieved in Coventry can include, but are not limited to:

- Changing the materials used in developments so they can adapt to extreme weather, for example, using light coloured bricks to reflect solar heat thus cooling buildings.
- Incorporating thermal mass and shading devices into building design in order to prevent overheating.
- Installing sustainable drainage systems such as permeable paving and infiltration devices. These can reduce the risk of flash flooding. Depending on the particular type used, SUDS can also have other potential benefits such as a reduction in water pollution and a decrease in the urban heat island effect.

Water Quality and Flood Risk Management:

The Policy will seek to reduce and mitigate flood risk particularly in locations which are susceptible to surface and river flooding. The Council will also seek to ensure the policy is supportive of the Local Flood Risk Management Strategy and Surface Water Management Plan that are currently being prepared to ensure a truly joint and consistent approach is achieved. The use of SUDS in development schemes will also be encouraged utilising the latest research and analysis to ensure the right technology is deployed in the right locations and circumstances.

Air Quality: The entire city has been declared an Air Quality Management Area (AQMA) and the Council will continue to produce Air Quality Action Plans to achieve prescribed national and European standards. New development proposals must, therefore, take steps to support improvements to air quality.

Noise: In a dense urban area such as Coventry, noise pollution can be an issue, whether it's from highways or industry. New development proposals will, therefore, need to ensure adequate building design and quality to mitigate any noise impacts that may be identified.

Future Opportunities

- produce a Coventry focused Building Sustainability Standards Supplementary Planning Document.
- explore opportunities for Area Action Plans to deliver zero carbon development in association with larger development schemes.

MINERALS AND WASTE

Background

This chapter introduces the policy options that exist around wider minerals and waste management planning issues. It builds upon previous consultation material and responses and seeks to set the platform from which a Local Plan Publication Draft will be produced.

Key Challenges and Opportunities

- ensuring that all wastes and associated management facilities are managed and planned in a sustainable way
- recognising the great importance mineral extraction and recycling plays in facilitating growth
- ensuring continued co-operation with neighbouring Mineral Planning Authorities to secure the equitable apportionment of mineral resources.

POLICY APPROACHES

Waste Management: Policy will set out proposed sites for new and existing waste management facilities, recognising the importance of sustainable waste management both locally and in co-operation with other councils in Warwickshire locality, to ensure that all waste management needs of the area are met. In a city such as Coventry with a significant growing population and a growing economy, a key issue is that of ensuring this does not automatically lead to a proportionate increase in waste.

The Policy will, therefore, aim to strengthen and encourage the continued need to re-use and recycle all wastes.

Safeguarding Mineral Resources

The Policy will define Mineral Safeguarding Areas (or MSAs for short) in order that proven mineral resources are not needlessly sterilised by non mineral development, although there is no presumption that resources defined in MSAs will be worked. In the Coventry context, the evidence suggests this would apply to sand and gravel and deep cast coal only. For the avoidance of doubt, no gas exploration (including fracking) proposals are currently being considered in Coventry.

Future Opportunities

- continued cooperation with neighbouring authorities to secure an appropriate supply of raw materials to meet development needs
- a need to consider suitable new waste management sites as part of the continued rise of recycling

Evidence Base

- Joint West Midlands Local Aggregate Assessment, 2014.
- Guide for Mineral Safeguarding in England produced by the British Geological Survey (BGS), 2007.
- Coventry Municipal Waste Management Strategy, 2008-2020.
- Warwickshire Local Aggregate Assessment, 2013



INFRASTRUCTURE

Background

This chapter introduces the policy options that exist around wider infrastructure planning issues. It builds upon previous consultation material and responses and seeks to set the platform from which a Local Plan Publication Draft will be produced.

Key Challenges and Opportunities

- Delivering the necessary infrastructure to facilitate Coventry's development needs.
- New monies to enhance and expand all forms of infrastructure.
- The need to ensure infrastructure provision does not impinge on development scheme viability.

Evidence Base

- Draft Preliminary Charging Schedule, 2014
- S.106 Annual Monitoring Reports, 2014
- Coventry Development Plan Annual Monitoring Reports, 2014
- Coventry, Solihull and Warwickshire Green Infrastructure Study, 2011
- Coventry Green Space Strategy, 2012
- Coventry Surface Water Management Plan, 2014
- Local Strategic Transport Assessment, 2014

POLICY APPROACHES

Green and Physical Infrastructure: covers key area such as parks, allotments, footpaths, cycle paths; natural spaces; sports and cultural facilities; and play areas. This element of the Policy will aim to build on the evidence by ensuring that the provision of a city-wide network of high quality, well-managed and well-connected, multi-functional green spaces, deliver a wide range of benefits to those living, working and visiting the city, and improving the attractiveness of the city as a whole. Opportunities to link green infrastructure delivery with other physical infrastructure such as transportation networks (roads, public transport, footpaths and cycle ways); water; drainage; flood prevention; and utility services such as electricity, gas and telecommunications will be encouraged as part of creating multi-functional provisions and contributing to an overall 'greening' of the urban area.



Social Infrastructure: Key issues that would be considered include: education (primary, secondary, higher and special needs); health facilities (hospitals and primary care providers); social services, emergency services (police fire and ambulance); and other community facilities, such as indoor sports, cultural facilities, libraries, cemeteries and community halls. Opportunities will also be explored to secure other forms of social infrastructure such as local employment schemes.

Funding Mechanisms: significant funding will be channelled through a range of funding streams, including through the utility and transport companies' existing investment plans (Severn Trent Water, Virgin Media and Centrica, ostensibly). The Council and its partners may also consider ways of promoting the city to new commercial operations such as Coventry District Energy Company and private health care companies in order to meet longer term shortfalls in provision or changing market requirements. The provision of all infrastructure will also be dependent on significant levels of Community Infrastructure Levy funding, which in turn will need to reflect development viability. This will identify an appropriate levy charge dependant on the type of development and where it is proposed to be located. The Council's draft Preliminary Charging Schedule (Draft CIL) will be published on the back of the Local Plan. Planning obligations will still be required until the CIL charging schedule is adopted to ensure provision is made for the necessary improvements to services and facilities or to secure compensatory provision for any loss or damage arising from, for instance the loss of open space. Obligations may also be necessary to help achieve Local Plan policies, such as the provision of affordable housing or contributions towards reducing Coventry's carbon footprint.

Transport and Highways: An integral part to enhancing the urban area revolves around transport networks, for the car, public transport and active travel. Ensuring accessibility to services, facilities, jobs and homes is a key element of this, and infrastructure provisions will be planned and promoted to ensure sustainable development throughout the city. This will build on the array of schemes already taking place across Coventry, including works around Toll Bar Island and the city centre.



Implementation and Delivery: multiple land ownerships can prevent land being considered for improvement, such as new walkways or public transport improvements. In this instance, the Council could explore its Compulsory Purchase powers to aid the delivery of key infrastructure. In order to ensure infrastructure is delivered in a timely and appropriate manner, the Council will maintain continued communication with all relevant public and private sector service providers. This will be established through the Community Infrastructure Levy charging schedule and associated consultations.

Future Opportunities

- flexibility in the way in which Infrastructure is funded through CIL and the ability to alter the levy accordingly.
- greater powers to local neighbourhoods which have an adopted Neighbourhood Plan as those areas will receive a percentage of the monies achieved through CIL charging.

MONITORING FRAMEWORK

Background

Detailed monitoring of successive development plans within Coventry has taken place for many years, including the preparation of annual reports setting out progress on the implementation of policies. The continuation of this process will be essential to ensure the new Local Plan achieves its aims and objectives.

Key Challenges and Opportunities

- continuing to monitor the performance of policies
- ensuring that the underperformance of policies is acted upon where necessary
- continuing to produce a coherent and accurate Annual monitoring Report which monitors all policy areas
- working towards consistent monitoring practices with neighbouring authorities through the DTC

POLICY APPROACHES

Housing

Key indicators include:

- completions and performance against targets
- types of property developed
- land Supply (five and 15 years)
- demolitions
- change of use/conversions
- affordable housing



- vacant dwellings
- development density

Economy and Employment

Key indicators include:

- completions of new floor space and employment land
- types of development completed (eg offices, industry and warehousing)
- land Supply for future provision
- loss of employment land to other uses

Access and Movement

Key indicators include:

- public transport (new bus stops or bus routes)
- introduction of new cycling provisions
- provision of new pedestrian facilities
- highway improvements

Environmental Management

Key indicators include:

- air quality
- recycling
- land contamination
- waste management

Shopping

Key indicators include:

- performance of major, district and local centres
- delivery of out of centre retailing
- diversity and balance of retail uses
- vacancy rates



Built Environment

Key indicators include:

- transport corridors and gateways
- the canal corridor
- the historic environment
- conservation areas, listed buildings - especially those on the 'at risk' register
- archaeological sites
- design standards, build quality (to code) and impacts on key view cones

Green Environment

Key indicators include losses, gains or improvements to:

- green space provision and enhancement
- outdoor sports facilities
- allotments
- urban green space
- nature conservation and landscape
- trees and woodlands

City Centre

Key indicators include:

- housing
- accessibility
- parking
- shopping
- leisure and tourism

Social Community and Leisure

Key indicators include losses, gains or improvements to:

- social, community, leisure and indoor sports facilities
- educational facilities including universities, schools and colleges
- health and social care

Future Opportunities

- explore new ways of publicising key information
- produce a 'living' monitoring report
- collect key headline information on a regular basis

INFRASTRUCTURE DEVELOPMENT PLAN – KEY ISSUES AND OPPORTUNITIES

Scenario	Types of Infrastructure		
	Physical	Green	Social
Scenario 1: Protecting the Green Belt	<ul style="list-style-type: none"> ✓ Knuckle Phase 1 – railway link from Nuneaton (Bermuda Park) to Coventry (Ricoh Arena) ✓ Dedicated alternative bus network (Electric City). ✓ A45 grade separation (new roundabout). ✓ A46 grade separations (new roundabouts) at Binley and Walsgrave. ✓ Flood risk management improvements - gulley cleansing, de-culverting, new engineering solutions. ✓ Public realm improvements - city centre hard/soft landscaping. ✓ On going highway improvements: Burnaby Road (linked to development proposals), Toll Bar Island, Whitley interchange and Stoneleigh Road/Kenilworth Road. 	<ul style="list-style-type: none"> ✓ 148 hectares of new open space and parkland (equivalent to 148 football pitches). ✓ Multi-functional uses including SUDs, drainage schemes and landscape design facilities. 	<ul style="list-style-type: none"> ✓ New schools, leisure and health facilities including community uses. This will include the existing school improvement and rebuilding programme.
Scenario 2: Building within the Boundary	<ul style="list-style-type: none"> ✓ North West Link Road ✓ Knuckle Phase 1 – railway link from Nuneaton (Bermuda Park) to Coventry (Ricoh Arena). ✓ Dedicated alternative bus network (Electric City) ✓ A45 grade separation (new roundabout). 	<ul style="list-style-type: none"> ✓ Improvements to existing parks and expansion of green spaces, including opportunity to explore a new country park. ✓ Multi-functional uses including SUDs, drainage schemes and landscape design facilities. 	<ul style="list-style-type: none"> ✓ Increased provision of new schools, leisure and health facilities including community uses. This will include the existing school improvement and rebuilding programme.

	<ul style="list-style-type: none"> ✓ A46 grade separations (new roundabouts) at Binley and Walsgrave. ✓ Flood risk management improvements - gully cleansing, de-culverting, new engineering solutions. ✓ Public realm improvements - city centre hard/soft landscaping. ✓ On going highway improvements: Burnaby Road (linked to development proposals), Toll Bar Island, Whitley interchange and Stoneleigh Road/Kenilworth Road. 	<ul style="list-style-type: none"> ✓ Likely to be upwards of 245 hectares of new open space and parkland (equivalent to 245 football pitches) 	<ul style="list-style-type: none"> ✓ New waste management facility and expansion of existing facilities.
Scenario 3: Sustainable Growth	<ul style="list-style-type: none"> ✓ North West Link Road ✓ Knuckle Phase 1 – railway link from Nuneaton (Bermuda Park) to Coventry (Ricoh Arena). ✓ Dedicated alternative bus network (Electric City). ✓ A45 grade separation (new roundabout). ✓ A46 grade separations (new roundabouts) at Binley and Walsgrave. ✓ Flood risk management improvements - gully cleansing, de-culverting, new engineering solutions. ✓ Public realm improvements - city centre hard/soft landscaping. ✓ On going highway improvements: Burnaby Road (linked to development proposals), Toll Bar Island, Whitley interchange and Stoneleigh Road/Kenilworth Road. 	<ul style="list-style-type: none"> ✓ Improvements to existing parks and expansion of green spaces, including opportunity to explore a new country park. ✓ Multi-functional uses including SUDs, drainage schemes and landscape design facilities. ✓ Approximately 245 hectares of new open space and parkland (equivalent to 245 football pitches) 	<ul style="list-style-type: none"> ✓ Increased provision of new schools, leisure and health facilities, including community uses. This will include the existing school improvement and rebuilding programme. ✓ New waste management facility and expansion of existing facilities.

Options 1 and 3 in particular, include opportunities to explore joint infrastructure schemes with neighbouring authorities to support growth and development options.

See below - proposed North-West Link Road



Note - this route is indicative at this stage

Knuckle – Phases 1-3

Improving rail connections between Nuneaton, Coventry and Leamington



Knuckle – Phases 1-3

