



Coventry City Council

3.1

Public report

Report to

Cabinet
Council

2 December 2008

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Report of

Director of City Development

Title

West Midlands Spatial Strategy – Phase Two Revision (Preferred Option) and the NLP Study

1 Purpose of the Report

1.1 The purposes of this report are to

- (a) set out a recommended response to the Regional Spatial Strategy (RSS) Phase Two Revision Draft Preferred Strategy (referred to in this report as the Preferred Option)
- (b) set out a recommended response to the further study (known as the Nathaniel Lichfield or NLP study) commissioned by the Government on increasing the number of new homes to be built in the West Midlands

2 Recommendations

2.1 Cabinet is recommended to:

- a) support the Preferred Option providing that its phasing policies are rigorously applied;
- b) welcome the inclusion of the principles for the sub-region agreed by the Coventry Solihull and Warwickshire Forum and ask that they be incorporated in policy;
- c) oppose the conclusions of the study by NLP for the reasons set out in paragraphs 4.12 to 4.16 below, and
- d) instruct officers to continue to work with partner authorities to produce co-ordinated responses to the RSS consultation and the NLP study.

2.2 Council is recommended to endorse this report subject to any amendments made by Cabinet and authorise its submission to the Government Office of the West Midlands as the Councils formal responses to the Preferred Option and the NLP study.

3 Information/Background

The Regional Spatial Strategy Review Process

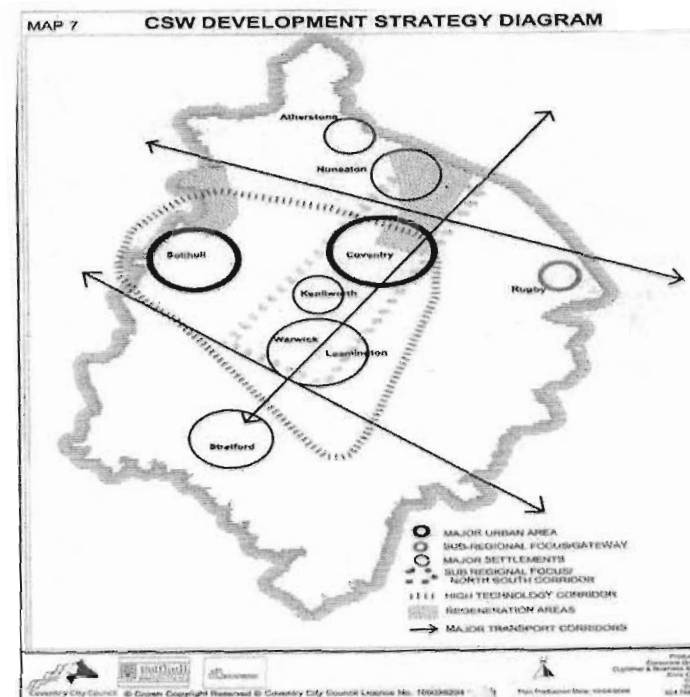
- 3.1 The Planning and Compulsory Purchase Act 2004 gave statutory status to regional plans and redefined the Development Plan to incorporate both the strategic elements of the regional plan (the RSS) and more local issues (the Local Development Framework or LDF including the Core Strategy). The Core Strategy and any Local Development Documents must be in conformity with the finally approved RSS. The Development Plan is the starting point for consideration of any proposals and decisions as to whether or not to grant planning permission should normally be determined in accordance with the Plan. The finally approved RSS and LDF for Coventry are therefore very important since they will have a fundamental input into the medium and long term future of the city.
- 3.2 The current RSS, which sets out the planning framework for the West Midlands region until 2021 was approved by the Secretary of State in 2004. He endorsed the principle of urban renaissance, focusing on development in the Major Urban Areas (MUAs), but said that there were several aspects of the RSS that needed to be reviewed to reflect new national guidance. This review is being carried out in three phases:
- **Phase One** covered the Black Country and has been completed.
 - **Phase Two** covers housing figures, employment figures, strategic centres for shopping and office development, transport and waste policies.
 - **Phase Three** began in November 2007 and will cover rural services, gypsy and traveller sites, culture, minerals and the environment.
- 3.3 Fundamental to delivering the urban and rural renaissance that underpins the 2004 RSS is the planned 'step-change' in the distribution of housing growth across the region. Since 1945, new household growth has been generated in roughly equal proportions by the region's major urban areas and the surrounding shires. However, prior to the 2004 RSS, two-thirds of new housing development has been directed to the shires and one-third to the major urban areas (MUAs).
- 3.4 Although the West Midlands Regional Assembly (WMRA), in its role as regional planning body, has the job of producing the RSS and its reviews, it has to be approved, and can only be changed, by the Government.
- 3.5 The Planning system is complex and this review mechanism has gone through various stages. A glossary of terms is appended and the timeline below is intended to assist in following the chronology of events that is then described in more detail in this report.

Date	Event - Region	Event – City and Sub-region
June 2004	Approval of RSS by Government	
February 2005	Launch of Phase 1 Revision	

November 2005	Launch of Phase 2 Revision	May 2006 Forum agree CSW Development Strategy
January 2007	Options Stage – Phase 2 Revision	
February 2007		City Council formal response to Phase 2 Options
July 2007		Coventry Solihull Warwickshire Forum agrees sub-regional strategy
November 2007	Launch of Phase 3 Revision	
December 2007	Submission of Phase 2 Revision "The Preferred Option" to Government	
January 2008	Government requests further work on housing numbers ("Baroness Andrews letter")	
October 2008	Government-commissioned Study completed (NLP Study)	
December 2008	End of consultation period on Phase 2 Revision	

The Phase Two Review

- 3.6 Work on the Phase Two review commenced at the beginning of 2005 when the WMRA asked unitary and county councils in the West Midlands to consider how housing growth down to district level might be handled - taking into account the household projections, then just published by Government (the 2003 based projections), which indicated levels to 2026 could be up to 51% higher than the original 2004 RSS had assumed.
- 3.7 Through the Coventry, Solihull, Warwickshire Forum (CSWF) the Council's within the sub-region worked together to respond to the WMRA's brief and a robust technical response, including a strategy for addressing growth in the sub-region, was agreed by the Forum. The Forum's submission indicated that Coventry should be the focus of growth within the sub-region and at the core of the North/South growth corridor. It also recognised that there may need to be;
- the release of some green belt land close to the core development area (North/South growth corridor);
 - Balanced provisions of housing and employment;
 - Support for the defined centres within the sub-region
 - Significant upgrading of public and other transport networks



- 3.7 The City Council made a second contribution through the West Midlands Planning and Transportation sub-committee as part of the response on behalf of the Birmingham, Coventry and Black Country City Region (BCBCR) in similar vein to the CSWF response.

Phase Two Consultation Options

- 3.8 In 2007, having considered all the responses, the WMRA then consulted on the Phase Two review and set out a range of spatial options of how growth could be distributed across the region and asked a set of specific questions in respect of housing, employment, strategic centres, offices, regional casinos, waste and transport and accessibility. The consultation emphasised the step change promoted by the 2004 RSS. The RSS Spatial Options reflected the 2003 Government household projections and the outcomes of the Barker Review that advocated increasing housing numbers so as to reduce price and improve affordability. There was therefore a requirement to build substantially more homes. Government projections predicted that in 20 years time, with existing house building rates, it was likely that only 30% of today's young people could actually afford to get onto the housing ladder.
- 3.9 The need to increase housing supply presented a number of key issues including how to balance housing growth and employment growth and maintain the strategies of urban and rural renaissance.
- 3.10 The consultation document considered three options as "reference points". The region could decide its preferred option anywhere between option 1 and option 3 - provided it had strong evidence to back it up. The document stated that numbers should not be allowed to drive the Phase Two Revision and that the right type of houses should be built in the right places - where people needed them - while respecting the character of the community and

environment where they are built. These options were essentially about how the anticipated number of households should be distributed throughout the region to continue to support the step change advocated towards a more sustainable approach to growth. It was acknowledged that the economic and social importance of housing growth increasingly drives consumer led private investment in business expansion and public investment in infrastructure such as transport, health and education facilities. Consequently, the scale, rate and distribution of housing growth was considered the single most important factor in delivering the RSS's urban and rural principles through the 'step-change'.

Option 1 simply rolled forward the 2004 RSS housing levels, ignoring the increased levels of housing demand indicated by the Government's 2003 based household projections - as such it was no more than a base line.

Option 2 proposed that building rates in the city broadly maintained the level which was expected to be achieved. It was a 'halfway-house' between meeting future demand and current delivery capacity with the result that Warwickshire towns would take the lion's share of new housing growth in the Coventry, Solihull and Warwickshire sub-region. As such the 'step-change', focusing growth in Coventry, would not be achieved

Option 3 provided the focus on Coventry which is implicit within the CSW Forum's response (see para 3.6) but implied a substantial increase in build rates in both the city and Warwickshire and pushed the scale and rate of housing development to significantly above that experienced in the past. It was proposed to be distributed to the more sustainable locations in the North/South corridor within Warwickshire with less restraint in Warwick but still with significant growth in or around Rugby.

3.11 In producing growth based on 2003 government household projections the consultation document indicated that a large proportion of the growth (> 70%) was predicted to be one-person households. In calculating the figures an allowance of 3% was made for vacant properties and assumptions were also made in respect of migration.

3.12 Coventry's and the sub-region's share of the options was:

	Number of Households 2001	Option 1 2001 – 2026 additional households	Option 2 2001 – 2026 additional households	Options 3 2001 – 2026 additional households
Coventry	122,353	19, 000	24, 400	44, 000
Solihull	80,930	11,000	15,000	18,000
Warwick	53,356	11,600	13,100	15,600
Nuneaton & Bedworth	48,683	10,000	13,100	15,600
Rugby	36,483	7,100	13,100	23,100
Stratford	47,202	7,200	9,300	9,300
North Warwickshire	25,176	3,100	3,900	3,900

The consultation acknowledged that for Coventry "development at the levels set out in Options 2 and 3 could involve the release of peripheral Green Belt land".

Employment Options

- 3.13 In considering employment the West Midlands Regional Assembly acknowledged the parallel process being led by Advantage West Midlands (AWM) to review the Regional Economic Strategy (WMRES) and that the parties were working together to ensure that the spatial and economic strategies were fully aligned to achieve employment led growth.
- 3.14 The Consultation acknowledged the difficulties in forecasting employment land need and asked for views on a proposal to include in the RSS a requirement for a five year "reservoir" of readily available employment land based on past trends, coupled with the maintenance of a land bank of sites with development constraints to help top up and maintain the reservoir through the plan period. It proposed that in Major Urban Areas this would be a minimum requirement and a maximum elsewhere. It acknowledged that an appropriate portfolio of employment land includes requirements for sub-regional employment land, good quality land and local and other land. An allowance was also made for economic growth. It predicted that Coventry could require 310 – 340ha of employment land between 2001 and 2026.
- 3.15 It also acknowledged further requirements for regionally significant employment sites including potential demand for regional logistics sites, regional investment sites and the need for additional major investment sites. It asked for views on the investment priorities for the strategic centres, including the balance between 'in centre' and 'out of centre' office development, alongside a regional hierarchy of centres for directing additional retail development.

3.16 In respect of shopping, additional retail floorspace in Coventry city centre of 50,000m² by 2021 net was earmarked. The estimates of our requirements for new additional office floor space up to 2021, of 260,000 – 290, 000m² (of which 140,000 – 160,000m² would be in the city centre) were assumptions based on a combination of supply and demand. However all of these predictions were dependent on the scale of growth and expressed as minimum

Waste Options

3.17 The main principle underpinning the WMRA's approach to waste planning was that each waste planning authority (WPA) should in future identify sites to manage all the waste arising within their own area, or sub-region, (municipal, commercial and industrial, construction and demolition) and only the residues from those treatment processes should be land filled. Government targets for waste recycling means that there will need to be a variety of new facilities from small composting sites to large recycling and recovery and energy plants.

3.18 Despite significant increases in waste recycling levels, a substantial requirement for new waste management capacity was identified. It was proposed that potential sites for waste management should be protected from competing uses - particularly given that waste management activities are often suitable uses for, and located on, employment land. It was not proposing to specify the numbers of facilities but three scenarios relating to the three levels of housing growth options were developed, specifying the tonnages of municipal waste and commercial and industrial waste that WPAs should manage. It was proposed that RSS should allocate to each WPA a quantity of waste for diversion (to recycling/re-use) and a quantity of residual waste that remains to be managed by whatever means that might be appropriate, such as landfill. Each Waste Disposal Authority (WDA) would decide how to manage the municipal waste arising in their area

Transport and Accessibility Options

3.19 Phase Two included a partial review of the Transport Section looking only at the areas highlighted by the Secretary of State for further consideration:

- Strategic Park and Ride – Criteria were identified for site selection; no sites were identified to serve Coventry. Memorial Park, North (existing) and East and West (proposed) were considered to be non-strategic.
- Regional Airports - The consultation suggested that policy for Coventry Airport should restrain capacity to no more expansion beyond 2m passengers a year, consistent with the position advocated at the recent Public Inquiry.
- Car Parking Standards – asked whether authorities could work together to set more restrictive standards in some towns centres and heritage areas, and for some land uses.
- Road User Charging – asked how should this be reflected in regional policy in advance of the outcome of the Gridlock and Growth that was considering this and what policies would be appropriate in the shire areas.

The Council's Response to the Phase Two Review Options Consultation

- 3.20 Coventry City Council formally considered its response to this consultation in February 2007. It was acknowledged that there were a number of issues which needed to be considered. Studies were ongoing to identify, clarify and inform the preparation of the Core Strategy and to form final decisions on the scale of growth that should be accommodated and the associated infrastructure requirements.
- 3.21 In considering the Council's response a key issue was whether or not the approach of the Phase Two review in distributing growth would deliver the strategy agreed by the CSW Forum and whether or not the scale of growth assigned to Coventry would deliver the Council's vision. It was acknowledged that Coventry has all the right things in place for growth – strong restructured local economy; young and growing population; development of the knowledge economy; two universities; excellent communications. It was therefore acknowledged that there was the potential for Coventry and the sub region to benefit from the substantial investment which must be associated with any growth agenda.
- 3.22 The quality of the environment of the city and the strength of the sub-regional economy would also continue to be a key consideration. Whilst traditionally most development land in Coventry had been brownfield there had been, until recent moratoriums, extensive release of greenfield sites in Warwick. In sustainability terms, it was considered that it must be better for greenfield land to be developed for housing in the right locations – with access to jobs, transport and community services – than brownfield land developed in the wrong locations. Similarly it was considered that it would be inappropriate if all employment allocations were peripheral. Cross border proposals involving some defined urban extensions that focussed on the existing North/South corridor could reduce travel and provide accessible and sustainable developments.
- 3.23 It was further acknowledged that if the underlying principle of focusing growth in the Major Urban Areas is not maintained then regeneration objectives would not be achieved. If the scale of growth assigned to Coventry relative to the surrounding districts in the sub-region and areas beyond was insufficient then there would be real risks that Coventry could become a dormitory town [where people live in Coventry but then commute to work elsewhere] between Birmingham and new town scale development on the east of Rugby - and with a huge increase within the Milton Keynes and South Midlands Growth Area. If substantial growth also went to Daventry (as some of the pressure is outwards migration from London) it seemed likely that this could undermine the regeneration of the city and the sub-region.
- 3.24 In considering the housing growth options it was recognised that Options 2 and 3 were not mutually exclusive (i.e. they were 'options' not alternatives) and it would be possible to progress from option 2 levels, rates and distributions of new housing growth to those in option 3. This mainly depended on the degree of public infrastructure and private business investment that could be applied to the locations taking the growth. However, it was acknowledged that this investment is always limited and many places in the region and adjoining regions will be competing for it. Arguably, under both options, for example, the scale of investment required to support increases in the size of Rugby of 50% and 100% respectively would compete with Coventry's requirements to support housing growth of

between 24,000 and 44,000 respectively (and vice versa). There was also concern that the city's ability to attract jobs and employment and retain graduates could be challenged.

3.25 The minute of the Council meeting in February 2007 states:

*The City Council sets out its **strategy and the underlying principles** in achieving the vision for a growing sustainable community. The City Council:*

- *Confirmed its continued support for the strategic approach of focusing development and regeneration on the Major Urban Areas including Coventry;*
- *Confirmed that growth must be employment led and that the strategy must be aligned with WMRES;*
- *Emphasised that growth can only be delivered with the support for infrastructure provision in terms of improved communications, public transport and the growth in schools, medical services etc;*
- *Emphasised that growth can and must be a stimulus and opportunity necessary to improve the quality of life;*
- *Emphasised that growth must act as the catalyst for developing sustainable communities and address climate change and quality of life issues;*
- *Endorsed the approach advocated by the CSW Forum that Coventry should be the focus of growth within the sub region and at the core of the North/South growth corridor and that there may need to be: -*
 - *Release of some green belt land close to the core development area (North/South corridor);*
 - *Balanced provisions of housing and employment;*
 - *Support for the defined centres within the sub-region; and*
 - *Significant upgrading of public and other transport networks;*
- *Indicated that further joint working with adjacent authorities is essential, particularly those within the Warwickshire sub-region to undertake the necessary further studies to identify and address any potential infrastructure constraints to move towards achieving Option 3;*
- *Emphasised that the housing strategy must make provision for housing for all sectors of the population and fully take into account predicted demographic changes; and*
- *Indicated concern that Option 2 may not achieve the underlying strategic objectives of the region or the sub-region, or deliver the city's vision, due to the level of housing provision being proposed elsewhere in the sub-region, particularly Warwickshire towns like Rugby.*

3.26 At its meeting in July 2007 the Coventry Solihull Warwickshire Forum, which includes members representing all eight local authorities, proposed that the Regional Spatial Strategy:

- **adopts** the main elements of the CSW forum's strategy and endorses the CSW sub-region for the purposes of RSS proposals and policies.
- **provides** for estimated housing demand generated by Coventry, Solihull and Warwickshire to be met in the sub-region – so long as it is robust and can be met within the CSW Forum strategy.

- **maintains** the RSS 'step-change' in the sub-region i.e. 50% (min) growth to Coventry and Solihull; growth focused on North/South corridor and Rugby; supporting infrastructure with growth in North Warwickshire and Stratford limited to local needs.
- **phases** housing land releases to encourage regeneration in the MUAs by giving priority to:
 1. **sustainable locations** first and foremost and,
 2. within those locations, **brownfield** land before greenfield land;
 3. then, if necessary, **urban extensions** within local authorities' areas; and
 4. only as a last resort, **cross-boundary urban extensions** in the North/South corridor – later in the plan period - if no more suitable alternative capacity is available.
- **enables** specific local Green Belt boundary adjustment for urban extensions to be made through Local Development Frameworks – when and where this is essential to meet long term needs.
- **proposes** that releases of land for housing are geared to maintain a constant average annual supply across the sub-region.
- **excludes** the provision of land in the sub-region to meet any 'overspill' housing needs arising from elsewhere such as Birmingham, Redditch or Tamworth.
- **includes** flexibility allowing for different ways of securing the RSS's 'step change' that reflect sensitivity to local circumstances.

3.27 Following consideration of all the representations received and further reflection, in December 2007, the Regional Assembly which also has representatives of all local authorities as members decided to approve the Phase Two Revision ("the Preferred Option") for submission to the Secretary of State. A further formal period of deposit was originally to be from 7 January 2008 to 28 March 2008 during which representations for or against the Preferred Option could be made.

3.28 The Preferred Option makes planned provision for some 365,000 additional households against the 2003 based projection of 381,000 additional households. Following its submission, the Regional Assembly received a letter from Baroness Andrews (appended to this report) that expressed concern about the housing proposals in the light of the Government's agenda to increase housing building across the country. It asked the Government Office for the West Midlands (GOWM) to commission further work to look at options which could deliver higher housing numbers and proposed the extension of the consultation period. Nathaniel Lichfield and Partners (NLP) were eventually commissioned to carry out the work and the consultation period in respect of the Preferred Option was extended to 8 December 2008. This intervention focused purely on housing numbers and did not seek to link these to employment or other issues.

- 3.29 The NLP study was published on 7 October 2008. It considers the scope, impact and implications of delivering additional housing across the region and will be evidence to the Examination in Public into the RSS Preferred Option due to take place in April 2009. It is important to emphasise that the study is additional evidence to the Examination and that authorities have been requested to distinguish between comments on the Preferred Option and on the NLP study.
- 3.30 Attached as Appendix 1 and 2 is a brief analysis of the RSS Preferred Option and the NLP Study. The two documents are treated separately in this report that seeks endorsement of the recommended responses to each of them.

4 Proposal and other Option(s) to be considered

- 4.1 It is considered that in forming a view on the RSS Preferred Option and the NLP Study the factors that led to your previous considerations outlined at paragraphs 3.20 – 3.23 are fundamental. Appendix 1 includes a list of all of the policies and provides a brief summary of their content. The proposals should also be assessed against the extent to which they continue to deliver the step-change embodied in policy in the 2004 RSS and in your sub-regional strategy built from the original response at the start of the process outlined in paragraph 3.6.
- 4.2 The strong sub-regional context of the Preferred Option should be welcomed and in particular the focus on Coventry as the centre of the sub region. This focus would be strengthened by the adoption of paragraphs 3.41 – 3.48 (see appendix 1, para 6.2) as policy. The distribution of growth within the sub-region and recognising the role of Nuneaton, Rugby and Warwick is also to be welcomed. Joint studies will need to look at phasing release of land if the strategy focused on regeneration is to be reinforced.
- 4.3 On employment land the interdependence of the sub-region is recognised and the spatial implications are being considered through the Core Strategy process. The RSS presents challenges to the sub-region in identifying appropriate locations for housing and employment uses that deliver sustainable communities. The emphasis in policy on retaining viable existing employment sites is welcomed and the principle of retaining a rolling reservoir of readily available land to respond to needs and provide a choice of sites is critical. Our own research has indicated that the recommended 82ha of land required to be available as a continuous five year supply is of the right order.
- 4.4 Your representatives at the Regional Assembly have successfully argued for a minimum figure that enables us to accommodate the considerable extent of office schemes in the pipeline within the city centre (such Friarsgate; the QCA; Equity & Law and Severn Trent). It follows that increasing the number of job opportunities in the city centre also increases the spending power to the city centre retail offer and therefore will be an important contributor in the regeneration of the city centre.
- 4.5 The target figure for comparison shopping floorspace will ensure that the city strengthens its sub-regional role and provides long-term support for the significant regeneration and redevelopment of the city centre which underpins the growth strategy.

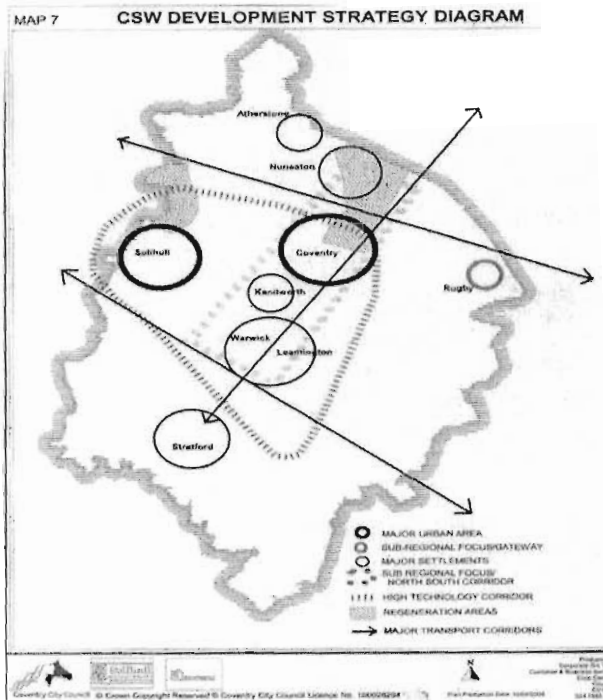
4.6 The Preferred Option is based on the Office of National Statistics (ONS) 2004 population projections. It provides for 365, 600 net additional homes across the region by 2026, arguing that this strikes the right balance between housing need and the overall objectives of the RSS. For the sub-region (when errors were adjusted) this forecast a requirement to accommodate an additional 82,000 households. If this growth were distributed according to past trends the distribution would have been:

Area (LAs)	Demand 2006-26 hhds net (%)	
Coventry	12,300	15%
Solihull	9,840	12%
N. Warks	3,280	4%
Nuneaton	6,560	8%
Rugby	9,020	11%
Stratford	14,760	18%
Warwick	26,240	32%
County	59,860	73%
CSW	100%	

However this distribution would not have been consistent with the step change that the application of RSS policies had started to achieve. Regeneration was starting to take place in Coventry and Nuneaton whilst a moratorium was in place in Warwick that was holding back housing growth. Growth was therefore distributed between the Metropolitan Urban Areas and the county districts on a 50:50 split. Monitoring of the existing RSS provides clear evidence of the success of the 'step change' strategy. For example, in 2006/07 the majority of Metropolitan Urban Areas achieved housing completions in excess of the minima targets set in RSS and across the region as a whole; 47% of total completions occurred within the Metropolitan Urban Areas. There are also signs that whilst migration from the Metropolitan Urban Areas continues the level of outward migration is reducing. The table below highlights the extent of redistribution and it can be seen that the emphasis is on Coventry and the corridor between Nuneaton and Bedworth and Warwick.

Area (LAs)	Advised Supply dwgs net	(%)	Demand 2006-26 hhds net	(%)	Redistribution
Coventry	33,500	41%	12,300	15%	+26%
Solihull	7,600	9%	9,840	12%	- 3%
	41,100	50%	22,140	27%	
N. Warks	3,000	4%	3,280	4%	-
Nuneaton	10,800	12%	6,560	8%	+4%
Rugby	10,800	13%	9,020	11%	+2%
Stratford	5,600	7%	14,760	18%	- 11%
Warwick	10,800	14%	26,240	32%	-18%
County	40,900	50%	59,860	73%	
CSW	82,000	100%	100%		

As requested by Scrutiny this is shown diagrammatically below:



- North Warwickshire 3,000
 - Nuneaton & Bedworth 10,800
 - Coventry 33,500*
 - Solihull 7,600
 - Rugby 10,800
 - Warwick 10,800
 - Stratford 5,600
- * Preferred Option "dependent on the capacity in Coventry and the outcome of further studies, some of the allocations could be made adjacent to Coventry within Nuneaton and Bedworth and Warwick Districts".

4.7 The Preferred Option reflects your resolution regarding the future growth of Coventry and the sub region and provide a basis for an employment led growth strategy. Many people question the appropriateness of the government's stance towards driving housing numbers up in order to increase supply, so reducing price to make them more affordable. There also remains debate about the likely effects of migration in a 20-year period and the extent to which household size will continue to reduce. It is predicted that 70% of the new households will be single person. The stance taken in the sub-region has been to accept the government's predictions and to then consider the most appropriate distribution of those figures across the sub-region to achieve the step change of the RSS policy.

4.8 The Preferred Option does include specific policies relating to the phasing of housing release and in the present uncertainties these are particularly important. Policy CF 4 of the Preferred Strategy emphasises the priority given early in the Plan period to retaining progress on urban renaissance and expressly provides criteria that local authorities should adopt when preparing their Local Development Frameworks, phasing land release and in determining planning applications. These criteria are:

- A The need to maintain and accelerate progress of urban renaissance
- B In sustainable locations, sites which are on previously developed land should be phased early in the plan period and, in most circumstances, prior to the phasing of greenfield sites
- C Sites, where the development would support regeneration through opening up further opportunities for mixed use sustainable development within cities and towns, should be phased early in the plan period
- D Only where insufficient sites on previously developed land, in sustainable locations, are available to meet the housing trajectory (including the expected contribution from windfall sites) should greenfield sites be released
- E The development of any greenbelt sites should generally be phased late in the plan period and after further investigation as to whether they constitute the most sustainable form of development in the local area and represent exceptional circumstances and
- F Local authorities in allocating and phasing sites in LDDs should not undermine urban renaissance within the authority or in neighbouring areas.

4.9 Similarly, in respect of employment opportunities Policy PA1 includes a requirement that:

- D Any development proposed on the edge of the MUAs or on other greenfield sites should meet the following criteria:
 - i. there are no suitable alternatives available on previously developed land and buildings within built up areas

- ii. the development should be capable of being served by rail or high quality public transport within easy access of centres and facilities and
- iii. the development respects the natural environment and historic heritage in accordance with policies QE1-9.

4.10 Your officers recommend that you support the policies of the Preferred Option. However you are recommended to make very clear that this level of growth cannot be accommodated without urban extensions in the city and at its boundaries – and indeed without the necessary infrastructure provided at the appropriate time. Furthermore you are recommended to emphasise the importance of the strict application of the above phasing policies

4.11 Coventry "has a foot in two camps", since it operates within two sub-regions, due to its status as one of the Metropolitan Councils of the West Midlands and its geographical location within the Coventry, Solihull and Warwickshire sub-region. Your officers have been working with both sets of partners in recent weeks and meetings have yet to take place (on 28 November) of both the Coventry, Solihull and Warwickshire Forum and the West Midlands Planning and Transportation Committee to approve responses. Such responses will form the basis for representations at the Examination in Public in 2009. Our position will be strengthened by the responses from these two sub-regional bodies being consistent with our approach.

The Nathaniel Lichfield and Partners Study (NLP)

- 4.12 Officers have also been working jointly to consider the NLP study. The consensus view of planning authorities across the sub-region is that the study:
- is based overtly on trend based analysis and projections which are themselves challengeable and not policy driven;
 - is one dimensional in focusing overtly on supply side factors rather than identified needs, and does not fully address environmental and social implications;
 - goes beyond its brief and challenges current RSS strategy, undermining the currently supported urban regeneration and growth-based policies;
 - will require delivery at unprecedented levels, both relating to the availability of sufficient infrastructure and whether the development and construction industries will have the capacity and/or willingness to deliver; and
 - has been prepared in a 'top down' manner that does not fully explore local impacts.
- 4.13 It is clear that the NLP study is market-led, and that it ignores the sub-regional growth corridor as set out in the CSW (Coventry, Solihull and Warwickshire) Sub-Regional Strategy (para 3.6). This potentially poses a significant threat to regeneration and perpetuates long distance, unsustainable cross commuting. Urban extensions in the North/South corridor must be more sustainable than new settlements either at Stratford or in Solihull.

- 4.14 The NLP study does not take account of additional employment land that would be required to service the additional households with jobs. This implies that additional land would have to be allocated (within the Green Belt) for employment development, over and above the amounts set out in the Preferred Option.
- 4.15 It is considered that the recent increase in housing supply within the city was directly linked to the restriction on housing land supply in the adjoining shires. It has been a fundamental principle of the operation of the planning system to guide development for wider public purpose rather than simply to facilitate development where the easiest and most attractive development options exist. There has to be recognition of market reality, but to allow that to drive a whole process does not sit well with good planning practice
- 4.16 Clearly market values and development costs are important and this is not in dispute. However, since we operate in a plan-led system, it has to be expected that land values are influenced by Government and other policy to a considerable extent. It follows that signalling an intention to release a large amount of green field land for development will adversely impact on urban, previously-developed land values, undermining urban renaissance. These are the fundamental principles on which the CSW Strategy are based.

5 Other specific implications

	Implications (See below)	No Implications
Best Value		☺
Children and Young People		☺
Climate Change & Sustainable Development	☺	
Comparable Benchmark Data		☺
Corporate Parenting		☺
Coventry Community Plan		☺
Crime and Disorder		☺
Equal Opportunities		☺
Finance		☺
Health and Safety		☺
Human Resources		☺
Human Rights Act		☺
Impact on Partner Organisations		☺
Information and Communications Technology		☺
Legal Implications		
Neighbourhood Management		☺

	Implications (See below)	No Implications
Property Implications		⊗
Race Equality Scheme		⊗
Risk Management		⊗
Trade Union Consultation		⊗
Voluntary Sector – The Coventry Compact		⊗

Climate Change and Sustainable Development

5.1 The Preferred option includes policies promoting sustainable development

Legal Implications

5.2 Section 4(4) of the Planning and Compulsory Purchase Act 2004 requires Metropolitan District Councils (along with County Councils) to provide advice on the Regional Spatial Strategy. Para 3.1 expands on the status of the RSS.

6 Monitoring

6.1 A well-established system is in place to monitor the implementation of the Regional Spatial Strategy.

7 Timescale and expected outcomes

7.1 The Examination in Public is scheduled to commence in April 2009.

	Yes	No
Key Decision	√	
Scrutiny Consideration (if yes, which Scrutiny meeting and date)	19 November 2008	√
Council Consideration (if yes, date of Council meeting)	√ 2 December 2008	

List of background papers

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Papers open to Public Inspection

Description of paper	Location
Regional Spatial Strategy Phase 2 Revision (RSS 4)	CC4/3.01

Glossary of Terms

CSW

Coventry Solihull Warwickshire sub region.

CSWF

Coventry, Solihull & Warwickshire Forum. The forum comprises Members from the local authorities in the area. The purpose of the forum is to exchange and share information on common issues that face the sub region and to identify and develop common sub regional approaches.

GOWM

Government Office for the West Midlands. Combined offices of key Government Departments at the West Midlands level.

LA

Local Authority

LDF

Local Development Framework. As part of the new planning system introduced by central government in 2004, local planning authorities are obliged to produce a Local Development Framework which will replace the Development Plan for the area. An LDF comprises a portfolio of documents, each with their own purpose, which collectively will deliver the spatial planning strategy of the local planning authority. The Core Strategy provides the overarching policies and then further detail for areas of change may be prepared in Action Area Plans. Other Local Development Documents (LDD) may also be prepared. These could include an Allocations document and more detailed development management policies.

MIS

Major Investment Site. Sites to accommodate large scale investment by single users with an international location choice. Designed to help diversify and restructure the Regional economy. (In the order of 50 ha)

MUA

Major Urban Area. The focus of Urban Renaissance which will underpin the spatial strategy. There are 4 MUA's in the West Midlands: Birmingham; the Black Country; Coventry; and the North Staffordshire Conurbation.

NLP

The Nathaniel Lichfield Partnership, a firm of consultants who produced a study commissioned by GOWM to explore the ability to a higher housing growth trajectory in the region.

N/S Growth Corridor

North South Growth Corridor. The focus of growth within Coventry Solihull and Warwickshire running from Nuneaton in the North through Bedworth and Coventry to Leamington / Warwick.

ONS

Office of National Statistics. The Office for National Statistics produces independent information to improve understanding of the United Kingdom's economy and society

RIS

Regional Investment Site. High quality, regionally identified sites of 25 -50ha attractive to external investment designed to support the diversification and modernisation of the regional economy especially in relation to the regions cluster policies.

RLS

Regional Logistics Site. Regionally identified sites to provide opportunity for the concentrated development of warehousing and distribution uses.

RSS

Regional Spatial Strategy. A strategy for how a region should look in 15 to 20 years time and possibly longer. The Regional Spatial Strategy identifies the scale and distribution of new housing in the region, indicates areas for regeneration, expansion or sub-regional planning and specifies priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment and disposal. The RSS for the West Midlands was approved in 2004 but is the subject of Review.

WDA

Waste Disposal Authority. The Waste Disposal Authority (WDA) is a local authority charged with providing disposal sites to which it directs the waste collection authorities for the disposal of controlled waste, and with providing civic amenity facilities. In England these are the County Councils and the Unitary Authorities.

WMRA

West Midlands Regional Assembly. The Regional Planning Body for the West Midlands.

WMRES

West Midlands Regional Economic Strategy. 10 year economic strategy prepared by Advantage West Midlands to maximise the opportunity for sustainable economic growth in the West Midlands.

WPA

Waste Planning Authority. The Waste Planning Authority is the authority that assesses which sites in the county are suitable and appropriate for building waste facilities of all types - dealing with rubbish of all types.

APPENDIX 1

The Preferred Option

- 6.1 This develops the theme of the RSS and identifies four major challenges.

Urban renaissance – developing the Major Urban Areas in such a way that they can increasingly meet more of their own economic and social needs in order to counter the unsustainable outward movement of people and jobs facilitated by previous strategies.

Rural renaissance - supporting rural communities to achieve their economic and social potential whilst embracing the challenges of access and climate change.

Diversifying and modernising the region's economy – ensuring that opportunities for growth are linked to meeting needs and that they help reduce social exclusion.

Modernising the transport infrastructure of the West Midlands – supporting the sustainable development of the region.

- 6.2 Chapter 3 describes the strategies being applied at a sub regional basis and in respect of Coventry and Warwickshire states:

Coventry.Warwickshire

3.41 Coventry is a compact city that is part of the City Region but also has strong economic and social ties with Warwickshire and Solihull. A Coventry, Solihull and Warwickshire (CSW) Forum advises the eight constituent authorities on the longer term development of the wider sub-region. Coventry has aspirations for growth and has been designated as a New Growth Point. The city recognises the importance of its Regeneration Zone to improving the overall quality of the city and in order to achieve the government's expectations, it will need to consider selective sustainable urban extensions into its surrounding Greenbelt.

3.42 With Coventry at its centre, the sub-region has strong structural and functional relationships running in a corridor from Nuneaton/Bedworth through, Coventry, to Warwick/Leamington. Within this North/South Corridor, there are significant contrasts between the less prosperous areas to the north and wealthier areas to the south.

3.43 The local housing markets in the sub-region, especially in the North-South Corridor, from Nuneaton through Coventry to Warwick/Leamington, are closely interconnected. These interconnections provide strong evidence of the need for a CSW Sub-regional approach to the planning of housing and employment land release, as well as transport investment across the sub-region. However, there is a difference in the characteristics of the housing need between the north and the south, with the former sharing the mixed problems of the Birmingham conurbation to the west and the latter having similar high affordability problems to those experienced in Worcestershire. These differences are reflected in the arrangements for the assessment and targeting of regional funding resources.

3.44 The south of the sub-region is one of the most economically buoyant parts of the Region. The Coventry-Warwickshire area is closest to the Milton Keynes/South Midlands

Growth Area, London and the wider South/East Region. This is reflected in strong growth pressures along the M40 corridor and to the south of Coventry where the expansion of Warwick University is acting as a catalyst for growth.

3.45 Given the proximity of these areas of significant economic potential so close to the MUA of Coventry, there is a real opportunity to focus development and realise the growth potential of the sub-region both within the City and also within the wider North-South Corridor. Development will be planned and controlled to ensure that it:

a) maintains the WMRSS 'step-change' in the Coventry, Solihull and Warwickshire area i.e. minimum 50% growth to Coventry and Solihull

b) focuses growth on the North-South Corridor and Rugby; with the necessary supporting infrastructure; but that growth in North Warwickshire and Stratford-on-Avon be limited to local needs

c) phases housing land releases to encourage regeneration in the MUAs by giving priority to:

~ sustainable locations first and foremost and, within those locations brownfield land before greenfield land

~ then, if necessary, urban extensions within Local Authority areas

~ only as a last resort, cross-boundary urban extensions in the North-South Corridor (later in the plan period), if no more suitable alternative capacity is available.

d) enables specific local Greenbelt boundary adjustment for sustainable urban extensions to be made through LDFs when and where essential to meet long term needs

e) proposes releases of land for housing geared to maintain a constant average annual supply across the sub-region.

3.46 The Coventry, Solihull and Warwickshire area is also crossed by an east/west transport axis from Solihull to the west through Coventry to Rugby in the east. Rugby acts as a 'gateway' with the East Midlands and South East Region and has been designated as a Settlement of Significant Development. However, it is not intended to attract migration from Coventry or the other MUAs and, if the regeneration of Coventry and the north of the Coventry, Solihull and Warwickshire sub-region is not to be undermined, phasing policy will need to control the scale of development on this axis.

3.47 Other than Rugby and the towns of Nuneaton/Bedworth and Warwick/Leamington within the North-South Corridor (i.e. also designated as Settlements of Significant Development), the role of all other settlements within Warwickshire will be to meet the housing and employment needs of the area in the most sustainable way. This will include the provision of affordable housing, especially in those more rural areas of north and south Warwickshire.

3.48 For the Coventry, Solihull and Warwickshire area, the WMES will complement the WMRSS in supporting the urban renaissance of Coventry city centre and the economic vitality of other smaller towns and Nuneaton. The WMES will support the modernisation and diversification of this area through the promotion of key sites for high-value employment purposes and the support for the creative sector in Leamington and Coventry. The WMES will promote the importance of the World Class Stratford initiative, the role of Stratford and the sub regional visitor economy.

6.3 There is also an increased focus in creating a more sustainable region, and the promotion of sustainable design and construction. This includes requirements that all new homes meet at least level 3 of the code for sustainable houses and that all medium and large scale developments incorporate measures for renewable or low carbon energy equipment to meet **at least** 10% of residual energy demand. Furthermore, all new housing developments will be required to meet CABA Building for Life good standard.

6.4 The main new proposals in the Preferred Option are for:

- **new policies** on climate change, sustainable communities, air quality and sustainable construction;
- the provision of **365,000 homes** across the region in the next 20 years,
- the designation of a number of towns and cities as "**Settlements of Significant Development**" (SSDs);
- the provision and distribution of **employment land** supply;
- the identification of **regionally significant employment sites**;
- the provision and distribution of **retail and office** floor space;
- **regional targets** for waste management and recycling and the location of future waste management facilities; and
- **adjustments to policies** on strategic park and ride, car parking standards, demand management and airports.

6.5 In respect of the city and sub-region:

- Policy CF3 defines the level and distribution of new housing development that the regions' development plans should make provision for between 2006 and 2026. For Coventry it identifies 33,500 homes but with a specific footnote that states "dependent on the capacity in Coventry and the outcome of further studies, some of the allocations could be made adjacent to Coventry within Nuneaton and Bedworth and Warwick Districts".
- Policy PA6A defines employment land provision and requires that local planning authorities (LPAs) make provision for a continuing five year reservoir of readily available employment land (new and recycled) outside city centres throughout the plan period. For Coventry a five year rolling supply of at least 82 hectares is required with an indicative long term requirement of 246 ha. Again a footnote acknowledges that "there is unlikely to be sufficient land within Coventry to meet employment land requirements over the plan period. Joint discussions will be required between Coventry City Council, Rugby Borough Council, Nuneaton and Bedworth District Council and Warwick District Council to ensure continuity of supply. Due to its size and strategic significance Coventry's employment land needs should be taken into account when proposals for the redevelopment of the site of the former Peugeot Assembly plant are considered".
- Policy PA7 emphasise the importance of high quality regional investment sites of the order of 25-50 hectares to attract national and international investors to support the diversification and modernisation of the region's economy and the development of the region's cluster priorities as identified in the West Midlands Economic Strategy. This policy recognises that "additional provision may be required to serve the needs of the Coventry and Nuneaton Regeneration Zone. Para 7.38 indicates that the Coventry-Solihull-Warwick High Tech Corridor is already adequately served.

- Policy PA11 defines a network of town and city centres and defines Coventry as one of four tier 2, centres. In Policy PA12A the LPA is required to plan for an additional 150,000 sq m gross comparison shopping floor space in the strategic (city) centre, between 2006 and 2026;
- Policy PA13A requires that we plan for a minimum of 250,000 sq m gross new office floor space in or on the edge of the city centre between 2006 and 2026.
- Policy PA13C provides a criteria based approach to the consideration of any proposals for a regional casino.

Schedule of Policies

Towards a More Sustainable Region
<p>SR 1: Climate Change</p> <p>Sets out policies and proposals for local authorities to include in their plans.</p> <p>A Build on strategy to mitigate and adapt to worst impacts of climate change by:</p> <p>Developing and using renewable energy in existing and new developments</p> <p>Reducing need to travel</p> <p>Reducing amount of biodegradable waste going to landfill</p> <p>B Enhance link and extend natural habitats</p> <p>C require all new developments to :</p> <p>Minimimise resource demand and encourage efficient use of resources, especially water, energy and materials</p> <p>Encourage construction climate proof developments and sustainable buildings</p> <p>Avoid development in flood zones protect essential infrastructure against flooding and promote use of sustainable drainage techniques</p> <p>Facilitate walking cycling and public transport</p> <p>Facilitate effective waste management</p> <p>Protect conserve manage and enhance environmental and natural and built heritage assets</p>
<p>SR 2: Creating Sustainable Communities</p> <p>Sets out policies and proposals for local authorities to include in their plans.</p> <p>A Provide for the planned levels of new housing (in Policy CF2) with sufficient population to achieve a well integrated mix of homes and inclusive communities and to meet peoples needs throughout their lives, including provision of affordable housing</p>

B provide for new employment generating activities to meet needs of existing population and any arising from new housing development and to create wealth within the community

C create attractive, well designed, adaptable, safe and secure developments with a sense of place responding to distinctive features of site and integrating and respecting local character and maximising the reuse of buildings and brownfield land

D provide for necessary services and social infrastructure to meet needs of population including health education and skills, spiritual, sport and recreation, cultural facilities and emergency services

E provide comprehensive green infrastructure network

F provide necessary public transport infrastructure and give priority to the most low carbon forms of transport, such as walking and cycling and reducing need to travel by car

G Provide environmental infrastructure needed to support new development

SR 3: Sustainable Design and Construction Sets out environmental standards for local authorities to consider in plans and in determining applications:

Requires sustainability statements accompany major applications that demonstrate at least good standard of West Midlands Sustainability Check list for development are achieved

All new housing developments meet CABE Building for Life 'good' standard and schemes over 10 units very good standard

New homes meet level 3 Code for Sustainable Homes with move towards level 4 before 2013 and level 6 before 2016. Offices and other non domestic buildings aim for 10% below target emission rate of current building regs by 2016

All major developments incorporate renewable or low carbon energy requirement to meet at least 10% of developments residual energy demand

Maximising potential for decentralised energy systems

Promoting use of local and sustainable materials; preparation site waste management plans to ensure at least 25% total minerals use derived from recycled/reused content

All new homes to meet or exceed water conservation standards in level 4 of Code for sustainable homes, offices meet BREEAM, and other buildings achieve efficiency savings of at least 25%

Require use of sustainable drainage systems and integrated water management

Promote and seek opportunities to introduce similar energy and water efficiency standards and sustainable drainage systems in existing buildings

Policy SR4 : Improving Air Quality for Sensitive Ecosystems

Consider impacts of new developments and increased traffic movements and adopt mitigation measures by :

Reducing the need to travel through development of sustainable communities

Securing sustainable transport choices including use of public transport and reducing the use of car

Avoiding siting of new sources of emissions near to sensitive European sites or development that would increase traffic levels on roads near sensitive sites

Ensuring air quality effects are considered including use of appropriate traffic management measures
Urban Renaissance
Policy UR1 : Implementing Urban Renaissance – the MUAs
Policy UR2 Towns and Cities outside Major Urban Areas
UR 3: Enhancing the Role of City, Town and District Centres Sets out measures to achieve the enhancement of centres:
UR 4: Social Infrastructure Sets out role of local authorities, relating to land use and investment, in improving service delivery
Communities for the Future
CF1: Housing within the MUAs Sets out role of housing in supporting Urban Renaissance strategy and emphasises need to maintain balance between employment prospects and housing development and to ensure environmental safeguards Recognises need for choice and variety of good quality housing and need to work with private sector as major provider, the Housing Corporation and registered Social landlords to improve quality of existing stock. Identifies need for significant resources and investment and need for action to renew and redevelop neighbourhoods focussed in areas where risk of problems spreading including Coventry
CF2: Housing beyond the MUAs Shows how strategic housing development should be concentrated in Settlements of Significant development [that in sub region include Rugby, Nuneaton/Bedworth ad Warwick/Leamington]
CF3: Level and Distribution of New Housing Development Distributes new housing development and promotes joint working.
CF4: Phasing of New Development Sets out principle and mechanisms for phasing housing land release.

CF5: Reuse of land and buildings for housing

Sets out principle of giving priority to development of brownfield land and re-use of existing buildings.

CF 6: Making Efficient Use of Land

local authorities should set out density policies to reflect local circumstances and the findings of housing market assessment . High density development should be encouraged on sites within or very close to strategic town centres and in locations close to public transport interchanges

CF7: Delivering Affordable Housing

Sets out targets for housing market areas and requirements for local authorities to set separate targets for social rented and intermediate affordable housing and to seek to maximise contribution which private sector make

CF8: Delivering Mixed Communities

Provides a steer towards providing dwelling types appropriate to local needs using evidence from sub regional and local market assessments general mix of types of accommodation required. Consideration of needs of different groups to ensure construction of appropriate mix and need for greater proportion of higher value housing in the MUAs and some other settlements and range of housing types and tenures

CF9: Sites for Gypsies and Travellers

States that development plans should ensure that adequate provision is made

CF10: Managing Housing Land Supply

States that development plans should include measures to manage the release of housing land to ensure development of brownfield and conversions as priority taking account of the need for new infrastructure and ground preparation; avoid undermining urban renaissance. Also requires take account of windfall

Prosperity for All

PA1: Prosperity for All

States that MUAs (including Coventry) will be primary focus for additional investment in sustainable economic growth and throughout region in Settlements of Significant Development. Emphasises need to ensure appropriate balance between new housing and new employment land provision

also sets out ways in which authorities should provide for employment development emphasising sustainability principles and phasing of development so Greenfield only released where no alternative suitable sites available and that development should be capable of being served by rail or high quality public transport within easy access to centres and respect the natural environment.

<p>PA2 Urban Regeneration Zones</p> <p>Seeks to focus investment in defined zones including Coventry and Nuneaton</p>
<p>PA3 : High-Technology Corridors</p> <p>defines three corridors including Coventry, Solihull and Warwickshire to encourage diversification of the regional economy three High Technology Corridors are identified within which cluster developments closely linked to the regions research and development capabilities and advanced technologies</p>
<p>PA4: Development Related to Higher/Further Education</p> <p>States that development plans should facilitate the needs of HE/FE institutions and research facilities to grow and expand</p>
<p>PA5 : Employment Areas in Need of Modernisation and Renewal</p> <p>Encourages agencies to work together to improve and maintain the physical business environment of established employment areas</p>
<p>PA6: Portfolio of Employment Land and Premises</p> <p>Sets out approach and distribution for employment land requirements including requirement to provide and maintain a range and choice of readily available employment sites as well as stock of premises. Sets out hierarchy of sites :</p> <p>Regional Investment sites</p> <p>Major Investment sites</p> <p>Regional logistic sites</p> <p>Indicates development plans should establish:</p> <p>Sub-regional employment sites</p> <p>Good quality employment sites</p> <p>Other employment sites</p>
<p>Policy PA6A Employment Land Provision</p> <p>Sets requirement for continuing 5 year reservoir and indicative long term requirement . For Coventry 82 ha with indicative long term 246 ha : note acknowledges unlikely to be sufficient land within Coventry to meet requirements over plan period and that joint discussions required. Also indicates Coventry's needs should be taken fully into account when considering proposals for redevelopment of Peugeot's plant at Ryton</p>
<p>PA6B: Protection of Employment Land and Premises</p> <p>Sets out approach to ensuring a continuing supply of available and suitable employment sites</p>

PA7: Regional Investment Sites (RIS) should be of order of 20-50 hectares

Ansty acknowledged as existing RIS

High quality sites attractive to national and international investors

Served or capable of being served by multi modal transport facilities and broadband IT infrastructure; posses good quality public transport links, or be capable of having such links provided; well related to the motorway and trunk road network; located within, or close to, the areas of greatest need and Accessible to effective education and training opportunities to ensure that the employment benefits are available to the local workforce

Policy acknowledges that additional provision may be required to serve the needs of Coventry and Nuneaton regeneration zone

PA8: Major Investment Sites

Intended to meet the need for accommodating very large-scale investment by single users with an international choice of locations in order to help diversify economy. At any one time region should have upto 2 sites readily available

Of order of 50 hectares; high quality sites; served served by multi modal transport facilities and broadband IT infrastructure; posses good quality public transport links, or be capable of having such links provided; well related to the motorway and trunk road network but avoiding sites immediately adjacent motorway junctions where likely to exacerbate congestion problems; located in areas close to a large pool of labour with employment needs; Accessible to effective education and training opportunities to ensure that the employment benefits are available to the local workforce

Policy PA9: Regional Logistics Sites (RLS)

Intended to provide opportunities for the concentrated development of warehousing and distribution uses. RLS with existing or potential for dedicated access to the regional rail and highway networks to be identified in development plans. Sites should be of order of 50 hectares; possess good quality transport links, or be capable of provision; served by multi modal transport facilities and broadband IT infrastructure; have an easy access to an appropriate labour supply and education and training opportunities; im to minimise environmental impact; have suitable configuration which allows large scale high-bay warehousing, intermodal terminal facilities, appropriate railway wagon reception facilities and secure parking facilities for all goods vehicles; be located away from incompatible neighbours allowing 24 hour operations and no restrictions on vehicle movements

PA 10 Tourism and Culture

PA11: Network of Town and City centres

Sets out hierarchy of strategic centres with Coventry as Tier 2 centre after Birmingham. Preferred location for major retailing; uses that attract large numbers of people; large scale office

PA 12 Birmingham's Role as a Global City

<p>PA12A Comparison Retail Floorspace Requirements 2006 – 26</p> <p>Sets out planned provision for comparison floorspace. For Coventry city centre 95000sqm by 2021 and further 55,000 sq m by 2026</p>
<p>PA12B Non Strategic Centres</p> <p>Local authorities should identify centres to meet local needs</p>
<p>PA13: Out-of-Centre Retail Developments</p> <p>States that not envisaged that any further large scale (over 10,000 sq m) out of centre developments or extensions will be required during plan period to meet comparison needs. Smaller scale proposals should be considered in accordance with development plan policies taking ull account of government guidance</p>
<p>PA13A: Office Development Requirements</p> <p>Sets out distribution that local authorities should plan for. For Coventry within or on the edge of the city centre 250,000 sqmetres</p>
<p>PA13B: Large scale office development outside of strategic centres</p> <p>Office developments with floorspace greater than 500 sq m should be located in or on edge of city centre, Permitted outside city centre only when need cannot be satisfied in centre; no adverse impact on the prospects of committed office development schemes proceeding within centre; adequate pubic transport access exists to all of intended catchment or will be provided as part of the proposal; no unacceptable adverse environmental effects</p>
<p>PA13C Regional Casinos</p> <p>Sets criteria for consideration of any proposal</p>
<p>PA14 Economic Development and the Rural Economy</p>
<p>PA15 Agriculture and Farm Diversification</p>
<p>Quality of the Environment</p>
<p>QE1 Conserving and Enhancing the Environment</p>
<p>QE2 Restoring degraded areas and managing and creating high quality new environment</p>
<p>QE3 Creating a high quality built environment for all</p>

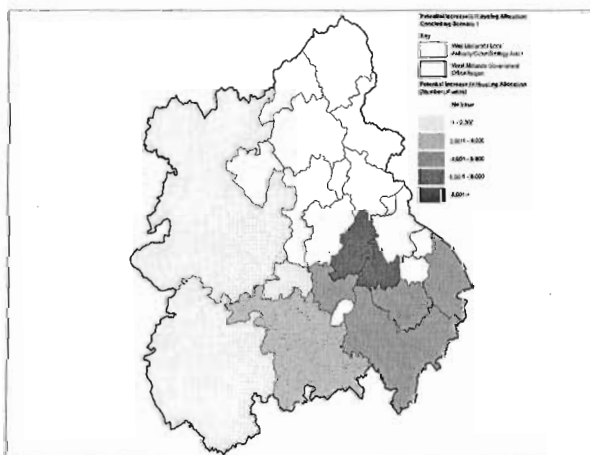
QE4 Greenery, Urban Greenspace and Public Spaces
QE5 Protection and Enhancement of the Historic Environment
QE6 The Conservation, Enhancement and Restoration of the regions landscape
QE7 Protecting, Managing and Enhancing the regions biodiversity and nature conservation resources
QE 8 Forestry and Woodlands
QE9 The water environment
EN1 Energy Generation
EN2 Energy Conservation
M1 Mineral Working for Non-Energy Minerals
M2 Minerals-Aggregates
M3 Minerals – The use of alternative sources of materials
M4 Energy Minerals
W1 Waste Strategy
W2 Targets for Waste Management
W3 The Need for Waste Management facilities
W4 Protection of existing waste management facilities
W5 The Location of New Waste Management Facilities
W6 Sites outside the Major Urban Areas and Other large settlements
W7 Waste Management Facilities and Open land
W8 Hazardous Waste-safeguarding sites
W9 Construction and Demolition waste
W10 Sites for Contaminated soils
W11 New sites for landfill
W12 Hazardous waste – final disposal sites

Transport
T1 Developing Accessibility and mobility within the region to support the spatial strategy
T2: Reducing the Need to Travel
T3 : Walking and Cycling
T4 : Promoting Travel awareness
T5 Public Transport
T6: Strategic Park and Ride. Identifies locations none within Coventry
T7: Car parking standards and management Sets out approach to developing maximum standards
T8: Demand management
T9 :The Management and Development of National and Regional and Transport Networks
T10 : Freight
T11: Airports Sets out roles of airports and approach to related development

The Nathaniel Lichfield and Partners Study (NLP)

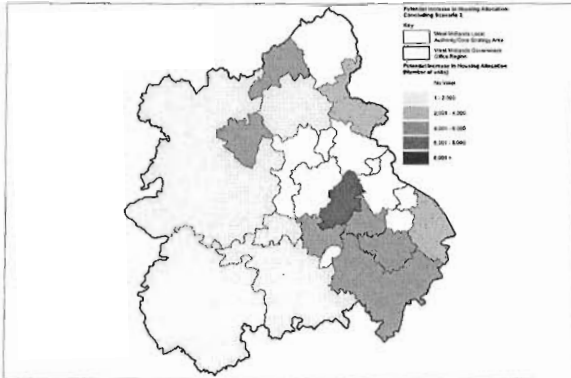
- 6.13 The NLP Study explores whether it is possible to increase housing provision over the Preferred Option in the light of the household projections published by the National Housing and Planning Advice Unit (NHPAU) in June 2008. It presents three potential growth scenarios, which total between 417,100 and 445,600 additional homes up to 2026.
- 6.14 The scenarios range from 51,500 to 80,000 more homes than the Preferred Option. Scenario 1 focuses growth in the south-eastern part of the region, including a new settlement in Solihull, and the rural west. Scenario 2 provides for slightly less growth in Solihull and Warwickshire, along with additional growth in the Stoke and Telford areas. Scenario 3 provides for increased growth in all these areas and other parts of Staffordshire.
- 6.15 Coventry's housing allocation remains unchanged for each of the options, at 33,500 additional homes. The report comments that the city is not identified in the options "due to significant increases above both past build rates and CLG projections in the RSS Phase 2 Preferred Option, although stakeholder feedback indicated urban extensions to Coventry (are) preferable to development in adjacent areas."
- 6.16 The following diagrams and tables shows the allocations for the sub-region suggested by the NLP Study.

South-East Focus



Scenario 1- South East Focus +51,500 / 27,500			
Coventry	33,500	Nuneaton & Bedworth	10,800
Solihull	20,600 +13,000	Warwick/Leamington	15,800 + 5,000
		Rugby	15,800 + 5,000
		Stratford	10,100 + 4,500
		North Warwickshire	3,000
Total	54,100	Total	55,500

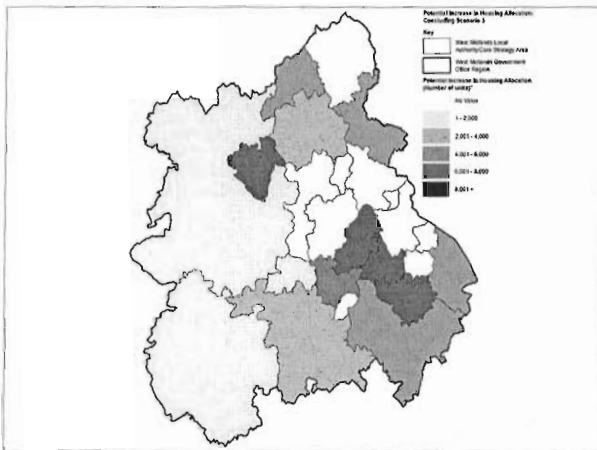
Spreading Growth



Scenario 2 – Spreading Growth +54,000 / 17,500

Coventry	33,500	Nuneaton & Bedworth	10,800
Solihull	12,600 +5,000	Warwick/Leamington	15,800 +5,000
		Rugby	13,800 +3,000
		Stratford	10,100 +4,500
		North Warwickshire	3,000
Total	46,100	Total	53,500

Maximising the Growth



Scenario 3 – Maximising Growth +80,000 / 29,500

Coventry	33,500	Nuneaton & Bedworth	10,800
Solihull	17,600 +10,000	Warwick/Leamington	20,800 +10,000
		Rugby	15,800 +5,000
		Stratford	10,100 +4,500
		North Warwickshire	3,000
Total	51,100	Total	60,500