



Communities and Neighbourhoods Scrutiny Board (4)

Time and Date

10.00 am on Thursday, 21st September, 2023

Place

Diamond Rooms 1 and 2 - Council House

1. **Apologies and Substitutions**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 8)
 - a) To agree the Minutes of the previous meeting held on 13 July 2023
 - b) Matters arising
4. **Local Plan Review - Issues and Options** (Pages 9 - 156)
Briefing Note of the Head of Planning Policy and Environmental Planning
5. **Work Programme 2023/2024** (Pages 157 - 160)
Report of the Scrutiny Co-ordinator
6. **Any other items of public business which the Chair decides to take as matters of urgency because of the special circumstances involved**

Julie Newman, Chief Legal Officer, Council House, Coventry

Wednesday, 13 September 2023

Note: The person to contact about the agenda and documents for this meeting is Usha Patel Email: usha.patel@coventry.gov.uk

Membership: Councillors M Ali (Chair), R Bailey, J Gardiner, G Hayre, M Heaven, A Hopkins, A Kaur and R Thay

By invitation: Councillor S Agboola (Deputy Cabinet Member for Housing and Communities)

Councillor D Welsh (Cabinet Member for Housing and Communities)

Public Access

Any member of the public who would like to attend the meeting in person is encouraged to contact the officer below in advance of the meeting regarding arrangements for public attendance. A guide to attending public meeting can be found here: <https://www.coventry.gov.uk/publicAttendanceMeetings>

Usha Patel

Email: usha.patel@coventry.gov.uk

Coventry City Council
Minutes of the Meeting of Communities and Neighbourhoods Scrutiny Board (4)
held at 10.00 am on Thursday, 13 July 2023

Present:

Members: Councillor M Ali (Chair)
Councillor G Hayre
Councillor M Heaven
Councillor A Hopkins
Councillor A Kaur
Councillor S Keough (substitute for Councillor J Gardiner)

Other Members: Councillor D Welsh (Cabinet Member for Housing and Communities)
Councillor S Agboola (Deputy Cabinet Member for Housing and Communities)

Employees (by Department):

Adult Services and Housing J Crawshaw, L Pain

Law and Governance G Holmes, U Patel, T Robinson

Streetscene and Regulatory Services D Blackburn, A Chowns

Apologies: Councillors R Bailey, J Gardiner, B Gittins and R Thay
Councillors P Hetherton (Cabinet Member for City Services)
G Lloyd (Deputy Cabinet Member for City Services)

Public Business

1. Declarations of Interest

There were no disclosable pecuniary interests.

2. Minutes

The Minutes of the meeting held on 23 March, 2023 were agreed and signed as a true record.

There were no matters arising.

3. Review of the Implementation of the Homefinder Allocations Scheme

The Scrutiny Board considered a Briefing Note of the Housing and Homelessness Lead and received a comprehensive presentation from the Housing and

Homelessness team which provided an update following the 12–18 month review report of the Coventry Homefinder Policy and accompanying IT system following their implementation in September 2021 alongside the wider context of social housing supply and demand. Specifically, the new scheme means that only those with an assessed housing need qualify to join the housing register.

The Coventry Homefinder Policy has five key objectives:

- Operate within the legal framework
- Be realistic, simple, and transparent
- Make best use of housing stock
- Lettings properties quickly
- Create balanced and sustainable communities

At the point that the new policy was introduced, the service committed to carrying out a review of the impact and effectiveness of both the new policy and the operation of the new IT system after both 6 and 12 months. This review report included data from both 12 and 18 months of operation.

The review examined feedback from partners of the scheme, including Registered Housing Providers that operate within Coventry, and representatives from Coventry Advice Agencies. The review evaluated each objective that the policy aims to achieve, recognised achievements, and addressed any issues that have been raised by partners for further development of the scheme.

An Equalities Impact Assessment was carried out alongside the review, to measure and mitigate against any impact that the policy has had on particular groups within the City.

The report outlined the current position of the scheme and the role that it has had in the first 18 months on those requiring social housing in Coventry and the subsequent impact that is linked to those owed duties by the statutory homelessness service. The report also outlined the current needs of those who are presently on the housing register and provided a breakdown of numbers in each key priority group who are able to bid for available properties on the register.

The report also demonstrated both the supply and demand of social housing within the City and the number of properties that have come available for letting within the first 18 months of the scheme being active. It also outlined the current level of need that is presently on the housing register and gave a breakdown of those in each priority band and the reasons for their housing need.

Members asked questions and received responses on the following items:

- Transparency and expectations for applicants on the scheme.
- Data regarding those waiting for accommodation.
- Refugee home finders and Ukrainian refugees on the scheme.
- Accommodation allocations received from housing associations including Citizen Housing and Midland Heart.
- Temporary accommodation both within and outside of the city, with prioritisation of finding temporary accommodation within the city for applicants.

- The crisis situation of social housing and the need for new social housing to be built.
- Accommodation prioritisation for those with a connection to the city.
- Accommodation repossessions in the context of rising mortgage interest rates and the cost-of-living crisis.
- Third party registration on the scheme.
- Accommodation stock for applicants with disabilities and mobility issues.
- Cost of living mortgage support and one-off payments to landlords.
- Application signposting and administration.
- The shortage of 3, 4 and 5 bedroom properties on the scheme.
- The prioritisation and possible motivators to encourage applicants to downsize and free up space for larger families requiring accommodation with more bedrooms.
- Targeted contact to better ascertain those requiring the appropriate prioritisation.

Councillor D Welsh (Cabinet Member for Housing and Communities) alongside the Board recognised, commended and thanked the Housing and Homelessness team for attending the meeting, sharing their successes and challenges of the Homefinder Allocations scheme, and for their continued work in the difficult environment of citywide social housing.

RESOLVED that the Scrutiny Board:

- 1) Notes the information and key findings detailed within the report**
- 2) Notes that a progress report on the recommendations identified following the review to be submitted to a future meeting of the Board. This to include an update on providing transparency to Homefinder applicants as to allocation wait times.**

4. Review of Additional Licensing Scheme

The Board considered a Briefing Note of the Head of Safer Housing and Communities and received a comprehensive presentation which provided information about the review of the Additional Licensing Scheme for Houses in Multiple Occupation (HMOs) and provided Members an opportunity to take part in that review.

The duty to licence Houses in Multiple Occupation (HMOs) was introduced in July 2006 through powers provided under the Housing Act 2004 (the Act), at that time HMOs that were 3 or more storeys in height and occupied by 5 or more persons required a licence through the HMO mandatory licensing powers.

In October 2018 the definition for HMOs requiring a mandatory HMO licence was changed to include any HMO occupied by 5 or more people forming two or more households, in effect removing the three-storey requirement.

Additional licensing of HMOs is a discretionary power that, if introduced by Local Authorities, can be applied to those HMOs which are not required to be licensed under the mandatory licensing powers.

The provision of good quality housing for Coventry residents is a priority for the City Council and additional Licensing of HMOs was first introduced on the 4th May 2020. The scheme can only run for a period of 5 years, during which time the Council must carry out a review. The Additional Licensing scheme means that all HMOs, including those properties converted into self-contained flats without building regulations approval (Section 257 HMOs) require a licence.

The private rented sector (PRS) is an important part of our housing market, with 4.7 million households in England. The sector has undergone rapid growth over the last ten years and is now the second largest tenure in England.

HMOs form a vital part of this sector, often providing cheaper accommodation for people whose housing options are limited.

HMOs are known to be commonly occupied by students but there are also a growing number of young professionals and migrant workers sharing houses and flats. Some HMOs are occupied by the most vulnerable people in our society.

These people live in properties that were not built for multiple occupation, and the risk of overcrowding and fire can be greater than with other types of accommodation. The government wants to support good private landlords who provide decent well-maintained homes and not impose unnecessary regulation however, the nature of HMOs means that regulation of this part of the sector is widely agreed to be necessary.

Mandatory licensing of HMOs came into force in 2006 under the Housing Act 2004 (the Act) and originally applied to properties of three storeys or more with five or more people making up two or more separate households living in them.

As demand for HMOs increased in the decade since mandatory licensing was first introduced there has been a significant increase in properties with fewer than three storeys being used as HMO accommodation, notably two storey houses originally designed for families and flats.

Some have been used by opportunist rogue landlords who exploit their vulnerable tenants, and rent sub-standard, overcrowded and potentially dangerous accommodation. The growth of HMOs has also had an impact on the local community, including where inadequate rubbish storage leads to pest infestation and health and safety problems.

In May 2020 the Council introduced a citywide Additional Licensing Scheme which required all HMOs in Coventry to be licensed.

Within the Act there is a legal requirement to review the scheme “from time to time” following its operation. To fulfil this requirement the Council intends to commence a review of the Additional Licensing Scheme.

Members asked questions and received responses on the following matters:

- Consultation dates, venues and times.
- Comparative data with regards to the impact, if any, that this scheme has made.

- Enforcement activity undertaken and specifically how many landlords were fined and a breakdown by ward.
- Potential landlord re-application loopholes.
- Licensing fees.

RESOLVED that the Scrutiny Board:

- 1) **Notes the information provided in the Briefing Note and Appendix 1 & 2.**
- 2) **Agrees to receive the final Cabinet report, which will provide information on the progress of the Scheme thus far following the conclusion of the review.**

5. Work Programme 2023-2024

The Scrutiny Board considered their Work Programme for the Municipal Year 2023/24.

RESOLVED that the Scrutiny Board (4):

- 1) **Notes the Work Programme for the Municipal Year 2023/24 with the inclusion of the following items identified at the All Member Scrutiny Session:**
 - a) **Local flooding and water quality**
 - b) **Housing retrofitting**
- 2) **Agrees that the Work Programme be updated to include the following items for the 21 September 2023 meeting of the Scrutiny Board:**
 - a) **Local Plan Review**
 - b) **Dog fouling to be brought forward and included as part of 'Reducing litter on our Streets – Community Initiative'**
- 3) **Notes that the following items will be added to the work programme for consideration at a future meeting:**
 - a) **Working with social housing providers to increase supply as part of the Housing and Homelessness item**
 - b) **Wildlife Reserve Management**

6. Any other items of public business which the Chair decides to take as matters of urgency because of the special circumstances involved

There were no other items of urgent public business.

(Meeting closed at 11.50 am)



Briefing note

To: Communities and Neighbourhoods Scrutiny Board (4)

Date: 21st September 2023

Subject: Local Plan Review – Issues and Options

1 Purpose of the Note

- 1.1 To enable members of the Communities and Neighbourhoods Scrutiny Board to contribute to the review of the Local Plan

2 Recommendations

- 2.1 The Communities and Neighbourhoods Scrutiny Board are recommended:
- 1) To consider the information provided in the briefing note and accompanying appendices.
 - 2) Identify any comments or queries to be included as part of the review.

Background and Information

3 The need to review the Local Plan

- 3.1 Coventry City Council adopted its Local Plan and accompanying Area Action Plan for the City Centre in December 2017. These documents set out how much and what kind of development is needed up until the year 2031, where it should go, and what policies should be applied in order to help the Council decide whether planning applications are acceptable or not. They are known as Development Plan Documents (DPDs) and are prepared in line with a strict legal process.
- 3.2 The Government currently requires that the policies of the adopted Local Plan should be reviewed every five years to see if they are up to date or whether they need changing or even rewriting to reflect changes to national policy or other matters.
- 3.3 This is what we are now doing. We are carrying out a full review which means that we are reviewing every policy to see what needs changing and why, and whether there are any new policy areas we should be introducing.

4 The One Coventry Plan and Climate Change

- 4.1 Since the Local Plan was adopted the Council has published a new corporate plan, the One Coventry Plan 2022 – 2030. The vision is set out below, which the reviewed Local Plan will need to play its part in delivering.

5 One Coventry Vision

- 5.1 'One Coventry – working together to improve our city and the lives of those who live, work and study here. We will create:
- A city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created
 - A city where our residents get the best possible start in life, experience good health and age well, in a city that embraces diversity, protects the most vulnerable and values its residents and communities
 - A city that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change'

6 Climate Change Strategy

- 6.1 The draft Climate Change Strategy was consulted on in spring / summer 2023, and it is intended to publish the final version by the end of 2023. This establishes a framework as to how Coventry City Council plans to work as a local authority, and through its arms-length operating companies, to meet sustainability objectives combatting waste and pollution, promoting biodiversity, focusing on the need to tackle climate change and adapt to the inevitable changes to the climate in Coventry and the UK.
- 6.2 The draft Climate Change Strategy contains the vision:
'To make Coventry the UK's leading Sustainable City, improving the quality of life for all'.
- 6.3 The draft strategy sets out five development pathways to sustainability:
- Low emission – new economic opportunities through decarbonisation and innovation
 - Nature-based – enhance the biodiversity and urban ecosystems of our green and blue infrastructure
 - Circular economy – new models of production and consumption, reducing waste and increasing re-use and recycling
 - Resilient – anticipate, prevent, absorb and recover from the impacts of climate change and changing weather patterns
 - Equitable and people-centred – inclusive urban communities, addressing poverty and ensuring a just transition to ensure our most deprived communities are not disproportionately impacted in our efforts to tackle the causes and consequences of climate change
- 6.4 In terms of the Local Plan review, the draft Climate Change Strategy states that:
'The Plan Review process will be wide ranging and should in particular consider opportunities to:
- Further promote energy conservation in buildings and the development and use of renewables for energy generation
 - Further protect and enhance biodiversity

- Promote high quality design that promotes active travel
- Ensure accessibility to public transport and minimise the need for the private motor vehicle
- Further reduce the risk of flooding and minimise the opportunities for heat gain'

6.5 It is essential that the Local Plan is prepared in a way which delivers sustainable development and supports our journey to net zero. The National Planning Policy Framework, within Local Plans must be prepared, sets out that there are three overarching objectives:

an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

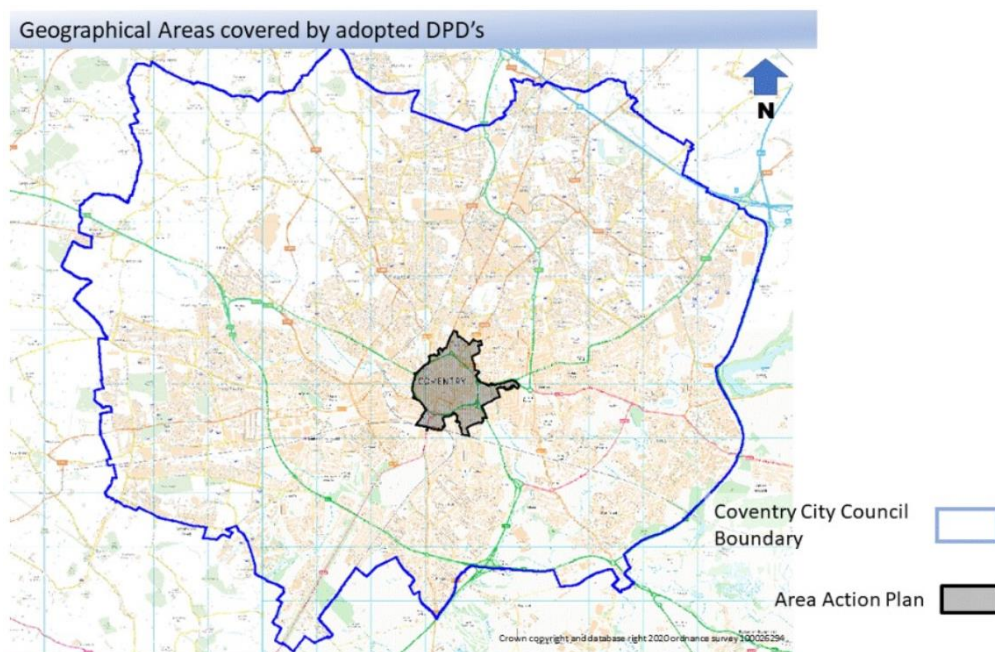
a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

6.6 The plan review takes into account the above context, alongside the need to consider changes to national planning policy and guidance and other relevant policy and guidance. These are detailed in the separate chapters of the plan which address different themes.

7 The area covered by the Coventry Local Plan and the Coventry City Area Action Plan

7.1 The map below shows the area which each plan relates to. We are reviewing these together through the consultation documents and it is our intention that a final reviewed plan will result in both plans being incorporated into a single document.



8 The process of the Local Plan Review

- 8.1 The first stage of the review is the 'Regulation 18' stage as defined in the Town and Country Planning (Local Planning) (England) regulations. This is about setting the scope of the plan and deciding what we need to address. We are calling this our 'Issues and Options' plan as we need to consider what issues have arisen since the plan was adopted, and, where relevant what options we need to consider as well as any suggestions for updating or introducing policy. We are consulting on this and will take account of comments when we move forward to drafting the reviewed plan.
- 8.2 Once we have made any changes, we will consult again through a formal process required by law ('Regulation 19') before submitting the proposed plan to the Secretary of State for Levelling Up, Housing and Communities who will appoint an independent Planning Inspector to examine the plan and decide if it is sound and can therefore be adopted by the Council.
- 8.3 Any changes to our planning policies, including developing new policy, must be supported by robust evidence and we will publish this when we consult so you can see our reasoning, as well as making clear where we think we may need further evidence. We also need to ensure our policies are sustainable, have regard to environmental and health matters and consider impacts upon our communities. We therefore also prepare a Sustainability Appraisal and an Equality and Health Impact Assessment and these are also available for comment when we consult as these help us to shape our policies.
- 8.4 It is important to note that **this is not a NEW Local Plan**. It is important that the review is proportionate and focuses upon areas which need updating, in particular any strategic areas of change as these will have the most impact.

9 How the Issues and Options consultation document works

- 9.1 The starting point is the adopted 2017 Local Plan and City Centre Area Action Plan, as the task is to review these adopted documents to see what is up to date, what needs updating, and whether any new policies are required.
- 9.2 To keep the process of the review as simple as possible, the Issues and Options document (Appendices 1 and 2) follows the topic order of the adopted Local Plan and Area Action Plan as it will be easier to follow. The policies may well be re-ordered in the final version to reflect changed priorities.
- 9.3 For the Local Plan we have summarised each current policy for ease of reference, and then explained where we think it needs changing and why, and where we may need to introduce new policy. **We have not replicated each existing policy in full, as this would be too unwieldy, however the existing adopted Local Plan and Area Action Plan and accompanying policies map** can be seen on our website <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031>
- 9.4 We have provided the references to the evidence we have used in reviewing our policies so you can read further detail if you so wish, and we have produced a series of topic papers to help steer the debate.
- 9.5 For the Area Action Plan (AAP) review, the adopted plan contains a series of localised policies relating to the city centre, so in Chapter 14 we consider these, and we are asking for your comments as to the future of the AAP.
- 9.6 We are providing opportunities to comment throughout the process so that we can clearly see what people think about our suggestions and so that we can make any changes necessary. We are asking a series of questions, some of which are general and some of which are more technical in nature to help us understand detailed

change which has taken place since the Local Plan was adopted and to help us gather evidence to understand this and justify any alteration to policy which might be needed. Not all of the questions need to be answered, choose only those you wish to respond to.

- 9.7 We are also consulting on a Sustainability Appraisal which accompanies the Issues and Options consultation document. The Sustainability Appraisal, including Strategic Environmental Assessment, is a legal requirement. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

10 Health Inequalities

- 10.1 A full Equality and Impact Assessment (EqIA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010). The Development Planning Document creates additional policy and so a further EIA has been undertaken. A refreshed EqIA will be produced as part of the Plan Review.

Appendix 1: Issues and Options consultation document
Appendix 2: Non-technical summary

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Coventry Local Plan Review
(Incorporates the Coventry City Centre Area Action Plan)

Regulation 18: Issues and options consultation

July 2023



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Chapter 1: Introduction

The need to review the Local Plan

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The Government currently requires that the policies of the adopted Local Plan should be reviewed every five years to see if they are up to date or whether they need changing or even rewriting to reflect changes to national policy or other matters.

This is what we are now doing. We are carrying out a full review which means that we are reviewing every policy to see what needs changing and why, and whether there are any new policy areas we should be introducing.

The One Coventry Plan and Climate Change

Since the Local Plan was adopted the Council has published a new corporate plan, the One Coventry Plan 2022 – 2030¹. The vision is set out below, which the reviewed Local Plan will need to play its part in delivering.

One Coventry Vision

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We will create:

- A city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created
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- A city that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change’

Climate Change Strategy

The draft Climate Change Strategy² was consulted on in spring / summer 2023, and it is intended to publish the final version by the end of 2023. This establishes a framework as to how Coventry City Council plans to work as a local authority, and through its arms-length operating companies, to meet sustainability objectives combatting

¹ <https://www.coventry.gov.uk/onecoventryplan>

² <https://www.coventry.gov.uk/draftclimatechangestrategy>

waste and pollution, promoting biodiversity, focusing on the need to tackle climate change and adapt to the inevitable changes to the climate in Coventry and the UK.

The draft Climate Change Strategy contains the vision:

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The draft strategy sets out five development pathways to sustainability:

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- Equitable and people-centred – inclusive urban communities, addressing poverty and ensuring a just transition to ensure our most deprived communities are not disproportionately impacted in our efforts to tackle the causes and consequences of climate change

In terms of the Local Plan review, the draft Climate Change Strategy states that:

'The Plan Review process will be wide ranging and should in particular consider opportunities to:

- a. Further promote energy conservation in buildings and the development and use of renewables for energy generation
- b. Further protect and enhance biodiversity
- c. Promote high quality design that promotes active travel
- d. Ensure accessibility to public transport and minimise the need for the private motor vehicle
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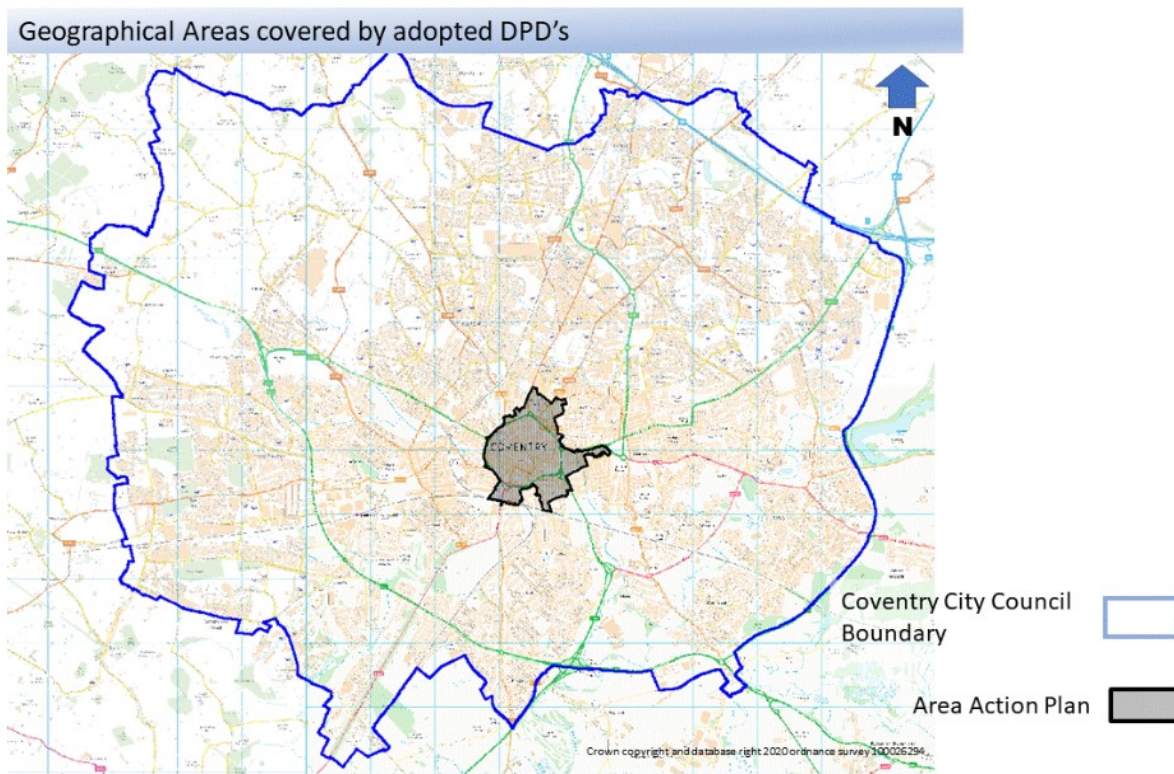
It is essential that the Local Plan is prepared in a way which delivers sustainable development and supports our journey to net zero. The National Planning Policy Framework, within Local Plans must be prepared, sets out that there are three overarching objectives:

- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The plan review takes into account the above context, alongside the need to consider changes to national planning policy and guidance and other relevant policy and guidance. These are detailed in the separate chapters of the plan which address different themes.

The area covered by the Coventry Local Plan and the Coventry City Area Action Plan

The map below shows the area which each plan relates to. We are reviewing these together through this consultation document and it is our intention that a final reviewed plan will result in both plans being incorporated into a single document.



The process of the Local Plan Review

The first stage of the review is the 'Regulation 18' stage as defined in the Town and Country Planning (Local Planning) (England) regulations. This is about setting the scope of the plan and deciding what we need to address. We are calling this our 'Issues and Options' plan as we need to consider what issues have arisen since the plan was adopted, and, where relevant what options we need to consider as well as any suggestions for updating or introducing policy. We are consulting on this, and will take account of comments when we move forward to drafting the reviewed plan.

Once we have made any changes we will consult again through a formal process required by law ('Regulation 19') before submitting the proposed plan to the Secretary of State for Levelling Up, Housing and Communities who will appoint an independent Planning Inspector to examine the plan and decide if it is sound and can therefore be adopted by the Council.

Any changes to our planning policies, including developing new policy, must be supported by robust evidence and we will publish this when we consult so you can see our reasoning, as well as making clear where we think we may need further evidence. We also need to ensure our policies are sustainable, have regard to environmental

and health matters and consider impacts upon our communities. We therefore also prepare a Sustainability Appraisal and an Equality and Health Impact Assessment and these are also available for comment when we consult as these help us to shape our policies.

It is important to note that **this is not a NEW Local Plan**. It is important that the review is proportionate and focuses upon areas which need updating, in particular any strategic areas of change as these will have the most impact.

How this Issues and Options consultation document works

The starting point is the adopted 2017 Local Plan and City Centre Area Action Plan, as the task is to review these adopted documents to see what is up to date, what needs updating, and whether any new policies are required.

To keep the process of the review as simple as possible, this document follows the topic order of the adopted Local Plan and Area Action Plan as it will be easier to follow. The policies may well be re-ordered in the final version to reflect changed priorities.

For the Local Plan we have summarised each current policy for ease of reference, and then explained where we think it needs changing and why, and where we may need to introduce new policy. **We have not replicated each existing policy in full, as this would be too unwieldy, however the existing adopted Local Plan and Area Action Plan and accompanying policies map** can be seen on our website <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031>

We have provided the references to the evidence we have used in reviewing our policies so you can read further detail if you so wish, and we have produced a series of topic papers to help steer the debate .

For the Area Action Plan (AAP) review, the adopted plan contains a series of localised policies relating to the city centre, so in Chapter 14 we consider these, and we are asking for your comments as to the future of the AAP.

We are providing opportunities to comment throughout this document so that we can clearly see what people think about our suggestions and so that we can make any changes necessary.

Chapter 2: Health and Wellbeing

Preamble - the City's priorities for healthy and safe communities and addressing climate change

Planning is essential to people's health. The way places are planned, designed, built, and managed has a significant influence over how communities can live healthy and fulfilling lives. Research shows that 60% of people's health status is determined by their socio-economic and physical environment, while the healthcare system and individual genetics account for 25% and 15%, respectively.

The One Coventry Plan seeks to reduce the differences in health inequalities and health outcomes that exist in the city and improve wellbeing and life changes for residents. The average life expectancy at birth in Coventry for 2017-19 was 82.2 years for females and 78.7 years for males, both of which were notably lower than the England average; not to mention the wide gap which means someone living in amongst the city's more deprived neighbourhoods die on average 10 years younger than a person living in amongst the city's least deprived neighbourhoods.

While Coventry is a relatively young city compared to the national average, there is an increasingly ageing population, which brings with it related health issues, such as over the Local Plan period there will be a 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems.

Town planning can contribute so much to the health of our population, and Coventry as a 'Marmot City'³ is dedicated to this. Coventry has been a Marmot City since 2013, and this Local Plan builds on this status. This means Coventry City Council is dedicated to improving public health and tackling the health inequalities that exist across the city, through the Marmot Principles. Health inequalities refer to the difference in health experienced from the poorest in society through to the richest. These differences are preventable, and urban planning has an important role in tackling them. Coventry City Council aims to reduce health inequalities by embedding the following Marmot Principles:

1. Give every child the best start in life
2. Enable all children, young people, and adults to maximise their capabilities and have control over their lives
3. Ensure healthy standard of living for all
4. Create fair employment and good work for all
5. Create and develop healthy and sustainable places and communities
6. Strengthen the role and impact of ill health prevention
7. Tackle racism, discrimination, and their outcomes
8. Pursue environmental sustainability & health equity

The Local Plan review will seek to further align with this corporate strategy by strengthening the Marmot City approach (the background to which is set out in the Health Topic Paper) by supporting the social and economic development of the city as well as improving access for residents to social infrastructure, public transport, open

³ <https://www.coventry.gov.uk/policy-1/coventry-marmot-city>

green space, education and employment and good quality housing for all. Creating healthy places for the future, where the healthy choice is the easy choice for residents.

Climate change and reducing emissions in the city is another fundamental issue underpinning all policies of the Local Plan review. The five development pathways in the Council's draft Climate Change Strategy are crucial to improving health and wellbeing. These include the pathways that seek to lower emissions; enhance biodiversity and urban ecosystems; increase the resilience of the city by providing better opportunities to improve the energy efficiency of homes; and reduce inequality and which is more people centred by improved access to open space, improving air quality and promoting healthier eating options. These are themes which are addressed throughout the plan, not just through the policies on health: like climate change, health is a cross cutting issue.

Policy HW1 Health Impact Assessments (HIA)

It is considered that Policy HW1 is important as it reflects the Council's priorities for promoting good health, reducing the disparities in deprivation across the city, addressing health inequalities and underpinning our Marmot City approach. The policy will also be important in terms of responding to the impacts of the Covid-19 pandemic, both in terms of the mental health consequences and the changes in people's personal and work life patterns.

Health can't be treated in isolation with many factors influencing our physical and mental health. Other chapters and policies in the Local Plan also play an important role in addressing health and wellbeing and new developments can play a significant role in reducing inequalities experienced across the city.

While Coventry has shown an overall pattern of improvement in the English Indices of Multiple Deprivation (IMD) relative to other Local Authority areas, it still has some of the highest levels of deprivation in the country with significant inequalities between neighbourhoods in the City. It is proposed to strengthen Policy HW1 to reflect the Council's priority to ensure all residents can lead a healthy lifestyle regardless of where they live.

We are proposing to change Policy HW1 to better recognise the importance of considering health outcomes through the planning system. Currently, Policy HW1 only requires major developments that meet defined criteria to undertake a HIA, and the associated Health Impact Assessment Supplementary Planning Document (SPD) sets out these criteria in detail.

We think every major planning proposal should have specific regard to health matters. Therefore, we suggest that Policy HW1 should be altered and expanded so that all major applications are required to demonstrate how they have considered relevant health and wellbeing issues through the submission of a supporting statement, which could, for example be included within the Design and Access Statement.

In terms of HIAs, we also propose that the threshold for when a full HIA must be carried out for housing developments should be lowered from the current 150 dwelling threshold. This is because many of Coventry's housing sites are smaller than 150 homes yet can have a significant impact upon on people's physical and mental health. The threshold would need to balance the Council's priority to protect and improve the health of residents while keeping it proportionate to the size and type of development proposals.

We also think the Health Impact Assessment SPD will ultimately need updating in line with any changes which are made through this review.

Relevant Health and Wellbeing Issues:

Our Topic Paper on Healthy and Safe Communities sets out the issues in Coventry, sets out the wider context relating to physical and mental health, summarises national and local key policy and guidance. In summary they key issues include:

- **Climate Change:** the importance of the linkages between climate change and health (also addressed through the Climate Change Topic paper), this is especially relevant to the Adaptation and Resilience pathway where extreme weather events such as the increased risk of heatwaves during the hot and dry summers create associated health risks to certain vulnerable groups, and the 'Equitable Person-centred development' pathway of the Council's draft Climate Change strategy as the vulnerable are most likely to suffer the most from the consequences of climate change.
- **Housing:** The quality of housing that someone lives in plays a huge role in their lives: poor quality housing has the potential to have a significant negative impact on someone's health. Issues associated with poor housing such as poor ventilation, damp, overcrowding, inadequate heating and energy efficiency, fuel poverty, affordability and availability can all have impacts on both physical and mental wellbeing. This is an issue which particularly impacts those on the lowest incomes.
- **Transport and Accessibility:** Connection to the community is an important consideration for ensuring people do not become physically and socially isolated, whilst also ensuring that people are able to access everything they need, including access to amenities, healthcare, employment and community facilities. Encouraging and supporting the use of active travel (walking and cycling) and use of public transport is a vital consideration here, to contribute to improved air quality (by reducing travel by car) and to personal wellbeing (mental and physical) for all, including those with disabilities.
- **Education and Employment** – Educational achievement is a vital consideration in the wider context of health outcomes, it can have a profound effect on people's life outcomes. Poor educational achievement is not only observed to potentially contribute to social alienation, but also has direct effect on people's employment opportunities. Alongside considerations relating to educational achievement, delivering inclusive growth is too observed as vital consideration in helping to address and overcome existing health inequalities.
- **Access to Green and Open Space**– The provision of good quality open and green spaces is a fundamental consideration in improving both physical and mental health outcomes. Not only does access to good quality space encourage people to be more active, but it can provide a valuable respite from busy urban life. Spending time in such spaces is observed to result in positive physical and mental health outcomes. Such spaces include space for play and physical recreation, for growing food, for walking, cycling and socialising. The provision of good quality, well connected and maintained open and green spaces also increases biodiversity and wildlife; supports measures for increasing shading to help mitigate the urban heat island effect; supports the Council's Urban Greening Factor proposals set out in the Greenspace and Biodiversity chapter; and mitigates the effects of flooding and urban drainage, all of which contribute to the health and wellbeing of residents.
- **Social Infrastructure:** Neighbourhoods that provide people with local, walkable access to everything they need such as schools, childcare facilities, health centres, local and healthy food shops, public buildings, open spaces, sport facilities and community facilities are fundamental in delivering better health outcomes. They can also provide opportunities for social interaction and a sense of community, vital for reducing social isolation.
- **Designing safe and healthy places** – People need to feel safe in their neighbourhoods, a fear of crime can impact people's mental health in a negative manner. Planning and design have an important role to play in helping to make places safer. This includes, improving public realm, providing suitable community facilities and drawing on good design in order to combat crime. The utilisation of good design is also a

fundamental consideration in helping to deliver healthy places, good design can contribute to improvements such as encouraging active travel or responding to climate change. The inclusion of 'shelter belts' can also help to conserve energy and reduce exposure to noise and pollutants. Places should be safe and healthy for all

- **Environmental Hazards:** The environmental conditions that people live in can have a profound effect on people's health, both mentally and physically. Ensuring that people are able to live free from dangerous levels of pollution is fundamental, examples of such pollutants include noise and air quality. In addition to this, the need to tackle both the causes and consequences of climate change, such as heatwaves and flooding and the need to adapt to changes will prove to be a major point of focus in improving health outcomes.
- **Food environment:** One of the challenges the Council faces in promoting healthy eating is the easy availability of foods high in fat, salt and sugar in local neighbourhoods, including the prevalence of hot food takeaways in some areas, along with the lack of easy access to healthy food choices. This is a particular concern in areas of social deprivation where fast food may also be the only readily accessible affordable option. This is considered further in our review of town centre policy later in this document.

We suggest an expanded Health policy would expect new development to help improve quality of life within the city through promoting healthy lifestyles, supporting the creation of healthier communities and helping to reduce health inequalities.

For those developments which would not trigger the need for a full Health Impact Assessment we propose that a checklist could be produced requiring that developers demonstrate (where relevant) how their proposal considers the above issues.

We suggest that one way of achieving this could be through the validation criteria, requiring applications to address the aforementioned health related topics through their Design and Access Statements, or through a supporting health statement. It is also suggested for Outline applications that this should be demonstrated and addressed at both the Outline and detailed stages to reflect the evolution of development proposals from gaining outline planning permission to the reserved matters being submitted.

Proposed checklist topics

Below are the suggested health related topics that we think could be considered by all major development proposals in a checklist (where a full HIA is not needed).

- Address the causes and consequences of climate change (cross reference to climate change policy), mitigating for potential negative health impact.
- Be well-connected to encourage active travel and public transport use (cross reference to transport and environmental management policies).
- Support the delivery of, or use of, essential community services and social infrastructure for the inclusion of all members of society, which includes accessible childcare facilities, health services, day centres, educational facilities, healthy food options and a range of other formal and informal uses (cross reference to community policies).
- Promote the diversity of all groups in society and the inclusion of vulnerable groups.
- Promote well designed and safe places that are inclusive, but which design out crime and feel safe for all members of society (cross reference to design policies)
- Address neurodiversity, with developments having regard to how different people experience and interact with the world around them, and how the layout and environment created will impact on them, their health, and their enjoyment of space with an emphasis on legibility,

permeability, use of landmarks, open spaces, street furniture, and the hierarchy of and access to busy and less busy spaces.

- Promote the development of high quality and well-designed housing for all, which includes the provision of energy efficient affordable and social housing, retirement housing, housing with care, sheltered housing / homeless accommodation and housing that is adaptable to reflect the different stages of people's lives. There should also be a higher emphasis on the provision of carefully orientated private outside amenity space in all housing developments (cross reference to housing policies) which could mean balconies in high density areas coupled with access to high quality public realm.
- Promote improvements to the existing housing stock in the city to ensure it is free from damp, is well insulated and energy efficient.
- Provide and protect access to open space, children's playgrounds, allotments and leisure and recreation facilities to promote active lifestyles; the greening of developments; and the increase in biodiversity and wildlife; and to mitigate the impacts of the urban heat island effect and of flooding and urban drainage, all of which contribute to the physical and mental health and wellbeing of residents (cross reference to Green Infrastructure policies).
- Promote vibrant town centres that provide people with access to a diverse range of uses, whilst seeking to avoid the overconcentration of uses that can have a negative health impact, for example Hot Food Takeaways, betting shops, etc. (cross reference to retail and centres policies).
- Promote a diverse local economy to meet a range of needs and skills.
- Support measures to promote walking and cycling (cross reference to transport and accessibility policies).
- Minimise exposure to and improvements in air, noise and vibration, and light pollution (cross reference to environmental management policies).
- Promote digital inclusion across all parts of the city with access and training in the use of the internet available to vulnerable groups.
- Contribute to local health infrastructure where this is justified and relevant to the and where there is a genuine and evidenced funding gap (cross reference to infrastructure policies).

QUESTION 1

Do you have any comments on our proposal to expand policy HW1 so that all major developments are required to demonstrate how health issues have been considered and addressed either within the Design and Access Statement or separate supporting health statement?

QUESTION 2

Do you have any comments on the proposed checklist and its content?

QUESTION 3

Given the significant implications development proposals can have on people's physical and mental health, what do you think the proportional threshold for housing developments requiring a full HIA should be:

- A. Unchanged – 150 dwellings or more – please explain why
- B. 100 dwellings or more – please explain why
- C. 50 dwellings or more – please explain why
- D. Other – please explain why

QUESTION 4

In terms of Outline applications and given how development proposals can change between outline approval and the reserved matters stage, when should HIAs and health checklists be required?

- A. At Outline stage only – please explain
- B. At Outline and reserved matters stage – please explain

Chapter 3: Review of the Overall Levels of Growth and the Duty to Co-operate

Preamble – the City’s priorities for sustainable development and addressing climate change

As set out in the introduction, the Council’s One Coventry Plan focuses upon sustainable development by supporting a strong and resilient economy, being a city which supports its residents and which embeds environmentally-friendly behaviour, lessening the pressures caused by climate change

Ensuring appropriate levels of sustainable growth will enable the reviewed Local Plan to contribute to addressing all five pathways of the draft Climate Change Strategy, set out in the introduction but reiterated here to emphasise their importance:

- Low emission – new economic opportunities
- Nature-based – enhance the biodiversity and urban ecosystems
- Circular economy – new models of production and consumption
- Resilient – anticipate, prevent, absorb and recover from shocks
- Equitable and people-centred – inclusive urban communities, addressing poverty

The National Planning Policy Framework (NPPF) already requires us to deliver sustainable development, balancing economic, social and environmental objectives as set out in Chapter 1 (Introduction). It is therefore vital that the level of development addresses our needs and ambitions whilst retaining the essential balance to ensure it is sustainable.

The NPPF states:

‘The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom– have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection’ (NPPF 2021 Para 7).

The review of the Local Plan has to be accompanied by a Sustainability Appraisal, and at this stage of the review we have commissioned an independent appraisal of our review to help guide us towards a final version, ensuring that we are taking the above principles into account and providing a steer if it is considered we may need further evidence. The Sustainability Appraisal is being consulted upon alongside this document.

It is within this context that the overall levels of growth are reviewed, to ensure that we are able to plan to ensure we are ‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’ as cited by Resolution 42/187 of the United Nations General Assembly, and reiterated as an underpinning principle of the NPPF.

Policy DS1 Overall Development Needs

Policy DS1 is a strategic policy which sets out the amounts of growth which Coventry needs to deliver between 2011 and 2031. The plan was adopted in 2017, evidence should be no more than five years old and therefore the evidence base needs to be updated along with the plan period.

Along with our local authority partners across Coventry and Warwickshire we have published a new Housing and Economic Development Needs Assessment (HEDNA) which sets out how much housing and employment growth (and of what type) we all need to be planning for to the year 2041.

The **Housing Topic Paper** sets out three potential housing growth scenarios and explains how the figures are arrived at.

- **Scenario 1** is the Government’s Standard Method calculation. This is the ‘default’ method set by Government and utilises the 2014 Population Projections, which have been shown to be erroneous for Coventry, significantly overestimating future need. This error has been admitted by the office for National Statistics. This method gives Coventry a total minimum need of 63,760 new homes over the plan period.
- **Scenario 2** is the HEDNA figure. This uses the more accurate 2021 Census data as an input to the calculations instead of the erroneous 2014 figures. This gives a need of 39,280 new homes over the plan period for Coventry.
- **Scenario 3** is the HEDNA figure but with the 35% uplift removed. The Government has applied this uplift to England’s 20 largest cities, but the figure is not justified and appears entirely arbitrary, having no relevance to addressing local need. Removal of the 35% uplift gives a need of 29,100 new homes over the plan period.

The Council’s view is that Scenario 3 represents the true need for Coventry, as it is based on the best available evidence. The Council therefore considers that this is the figure that we should deliver and is seeking views on this approach.

Table 1: summary of housing need alternative calculations

	Government default Standard Method (using the 2014 Population projections)	HEDNA method (using the 2021 Census data)	HEDNA method with 35% uplift removed
Dwellings per annum	3,188	1,964	1,455
Total need over the 20 year plan period 2021 - 2041	63,760	39,280	29,100

QUESTION 5

Do you have any comments on the Council’s view that it should be using the HEDNA figure with the 35% uplift removed to establish its local housing need?

QUESTION 6

Do you have any comments in relation to the alternative growth scenarios, or other options which the Council should consider?

Employment Land Needs

The HEDNA has determined that the most appropriate Functional Economic Market Area (FEMA) is aligned to the Housing Market Area (HMA) and that Coventry and Warwickshire remains an appropriate 'best fit'. The HEDNA states (para.1.9): 'Inevitably functional market areas clearly do not precisely fit to local authority boundaries; and at the borders of any area HMA there are often links with the adjoining areas. Plan making activities should therefore continue to recognise overlaps in North Warwickshire and Stratford-on-Avon with the Birmingham HMA and FEMA; between Rugby and West Northamptonshire; and local links across the A5 with Hinckley and Bosworth (which is in Leicestershire).'

The HEDNA has modelled figures for employment land upon labour-demand modelling for office needs, gross completions trends for industrial and warehousing uses, and a margin for flexibility to take account of the fact that forecasting is not an exact science, that location and size requirements will vary and that there may be delay in sites coming forward.

The HEDNA provides the following figures for Coventry:

Table 2 - Employment Land Needs for Coventry 2021 – 2041 (Hectares, measured as developable land)

Office	General Industrial (excludes strategic B8)	Total
8.5	147.6	156.1

It should be noted that, there is a separate calculation for 'strategic B8' which is the growth of the logistics sector, and which relates to warehousing units over 9,000sq.m (100,000 sq.ft). Because of the scale and nature of this kind of development it needs to be considered at a strategic scale therefore the need across the whole of the Coventry and Warwickshire sub-region is projected to be 551 hectares to 2041. Partners in the sub-region have joined with partners across the wider West Midlands to produce a West Midlands Regional Strategic Employment Sites Study to better understand the issue and to plan for growth accordingly. This piece of evidence is due summer 2023

The employment section of this Issues and Options paper reviews the city's current supply pipeline as well as the allocations for employment land.

QUESTION 7

Do you have any comments on the overall Employment Land Needs for Coventry?

We have also commissioned a new Retail and Centres study to help us understand the issues and changes now occurring in this sector and we cover this in Chapter 6, Retail and Centres.

Policy DS2 The Duty to Co-operate

Policy DS2 was produced to reflect the Council's commitment to co-operate with partners on a range of matters including housing, economic growth, infrastructure, regeneration, transport, health and the environment. The policy refers to key growth and expansion projects at Jaguar Land Rover (Whitley), the University of Warwick, Coventry Gateway, Ansty Park, Pro-Logis Park at Keresley and residential development south of the City boundary, and sets out the Council's commitment to collaboration in order to effectively deliver these strategic schemes.

The policy also references the need to support the work of the sub-region in particular citing the Coventry and Warwickshire Local Economic Partnership (CWLEP)

We think this policy could be improved. The statutory Duty to Co-operate remains in place at the time of writing although the policy should now include reference to Statements of Common Ground to reflect updated national Planning Practice Guidance.

LEPs have been phased out by Government but we think we should replace the CWLEP references with reference to the work of the West Midlands Combined Authority (WMCA) of which Coventry City Council is a constituent member.

We think there is an opportunity to improve the wording at Part 3 of the policy. At the moment this refers to supporting joint evidence, but it could be expanded to refer to the delivery of joint projects where they support the objectives of the relevant plans.

We think the wording of part 5 could be strengthened to include reference to a joint monitoring approach.

QUESTION 8

Do you have any comments on our proposed amendments to Policy DS2?

Policy DS3: Sustainable Development Policy

Policy DS3 specifically reflects the National Planning Policy Framework and therefore we consider that this element of the policy does not need updating. However, we consider that the policy now needs to be updated to reflect the priorities of the One Coventry Plan and of the emerging Climate Change Strategy (which is currently in draft form and was consulted on early 2023)

QUESTION 9

Do you have any comments on our proposals to update Policy DS3?

Policy DS4 Part A (General Masterplan Principles), Part B (Whitley), Part C (Keresley SUE) Part D (Easter Green SUE)

We think that there is an opportunity to update Part A of this policy to strengthen references to design both in term of design guidance nationally, and its local application. The Design Topic Paper explains the context to this, and changes would be cross referenced to updates to the design policy section.

QUESTION 10

Do you have any comments on our proposed updates to Part A of policy DS4?

As set out in the Green Infrastructure and Biodiversity Topic Paper we also think DS4 parts xi and xii. must emphasise the importance of biodiversity and green infrastructure in the general wellbeing of a city, highlighting a need to increase tree coverage, wildlife-friendly buildings and create new green spaces to improve health indicators and provide climate resilience.

We think the site-specific elements of the policy (parts B, C and D) should remain largely unchanged although use-class references should be updated to reflect national legislative change. This is because progress on these sites are underway and it would not be appropriate to alter any context which could affect planning applications and site delivery. We feel the wording remains robust.

QUESTION 11

Do you agree that we should make a minor change B, C and D in terms of changing the references to use classes to reflect new legislation?

Chapter 4: Jobs and Economy

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

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

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

The Council's Economic Development Strategy⁴ is focused upon creating a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow and new local jobs are created. This includes emphasis upon a strong support infrastructure, social value, sustainability, skills, and an ambition to lead in the green industrial revolution to tackle the challenges and opportunities presented by climate change.

Defining the economy and 'employment' in planning terms

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

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

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

⁴ <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/2>

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

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

Proposed new policy: defining 'employment'

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

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

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

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

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

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

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

QUESTION 12

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

Policy JE1: Overall Economy and Employment Strategy

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

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

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

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

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

QUESTION 13

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

QUESTION 14

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

Policy JE2: Provision of Employment Land and Premises

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

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

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

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

Table 3: Available Employment Land at March 2023

Site type and status	Hectares (Net)
Non-allocated sites under construction	0.08
Non-allocated sites with permission but not yet started	1.98
Total non-allocated employment sites coming forward	2.06
Allocated sites with planning permission	-0.19 ^[1]
Allocated land without permitted planning permission	58.48
Total available employment land	60.35

¹ Excludes City Centre South due to unknown quantum at this stage | Data taken from HELAA FIGURES TO BE CHECKED.

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

Table 4: Employment Land Supply at September 2022

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

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

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

Table 5: Supply vs Need

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

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

QUESTION 15

Do you have any comments on the supply of employment land?

QUESTION 16

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

- A. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1
- B. A site you would like us to investigate? Please provide as much detail as you can
- C. Another suggestion or comment – please provide detail

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

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

QUESTION 17

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

Policy JE3 Non-employment uses on employment land

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

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

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

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

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

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

QUESTION 18

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

QUESTION 19

Do you have any other comments regarding policy JE3?

JE4 Location of Office Development

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

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

- The reference to Friargate Class B1 office development needs to be changed to Class E g (i) as this reflects changes to the Use Classes Order
- Permitted Development rights should be removed from major office developments to avoid undermining the aim of the Local Plan to deliver a sustainable and balanced strategy
- References to 'large scale' office development should be replaced with 'major' office development
- We think references to the need for offices to be close to a primary route on the highway network does not fit in with the climate change agenda and that this should instead be changed to refer to sustainable modes of transport
- Part 5 of the proposals refer to the need for an Impact Assessment as this was, at the time, required by national policy. This is no longer the case, so we propose to delete this and instead rely upon the sequential test.

QUESTION 20

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

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

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

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

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

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

QUESTION 21

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

QUESTION 22

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

QUESTION 23

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

JE6 Tourism / Visitor related development

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

QUESTION 24

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

QUESTION 25

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

JE7 Accessibility to Employment Opportunities

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

QUESTION 26

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

Chapter 5: Housing

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

Since the origins of the planning system, it has been identified that health and good quality housing are intrinsically linked with the latter being so important to the health and wellbeing of residents. In line with the One Coventry Plan, the Local Plan will promote the building of both high-quality affordable housing and a range of size and type of housing to meet demand in the city, which also includes social housing. The Local plan will align with the corporate aim of the One Coventry Plan to deliver more social housing to those that need it most, which is also community led and has community involvement at its heart.

The five development pathways in the Council's Climate Change Strategy seeks to improve the energy efficiency of the City's housing stock, creating a more resilient city that better responds to the risks of climate change and extreme weather events such as flooding, heatwaves and droughts as well as the lowering of overall emissions, which the Local Plan will also promote to align with these Corporate housing objectives.

Policy H1: Housing Land Requirements

We consider that this policy needs updating in terms of the quantum of development. The starting point will be the strategic options for growth as set out in our review of Policy DS 1. We are asking for comments in that section: Overall Development Needs.

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

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

Table 6: Supply as at 31st March 2023

Housing land supply	Number of Homes
Past net completions	3,818 (2021 /22 monitoring year)
	1,620 (2022 / 23 monitoring year)
Call for brownfield sites	1,200 (approx.)
Sites with planning permission (includes those under construction but not completed)	11,914
Local Plan allocations – remaining capacity	3,151
City Centre Area Action Plan Remaining Allocations	455
Windfall	3,000 (2026 onwards)*
Total	25,158**

*See AMR for explanation on how calculations are worked out. No windfall figure included in first 3 years of deliverable tranche to avoid potential double counting with permissioned sites.

It is important that we can accommodate as much of our identified need as possible, therefore further work on this will need to be undertaken to see whether any parts of the city can accommodate increased densification. Present policy applies a density of 200 dwellings per hectare (dph) within the ring road but we could look at areas adjacent to the outer edge of the ring road too. We need to be careful however that we have a balanced sustainable strategy which addresses climate change, delivers a high standard of healthy living, provides local employment, and accessible services and facilities and this is also considered in the accompanying Sustainability Appraisal. Further work will be undertaken to explore opportunities in this regard.

The NPPF is clear that a ‘brownfield first’ approach needs to be applied, therefore this is the approach that will be undertaken in the review of this plan.

QUESTION 27

Do you have any suggestions which can help us meet our housing need within our area?

- A. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1
- B. An area you think could be densified which still achieving a high standard of living? Please provide as much detail as you can
- C. A site you would like us to investigate to see if it might be suitable for housing? Please provide as much detail as you can
- D. Another suggestion or comment – please provide detail

Policy H2 Housing Allocations

This policy will need updating. The current position on the housing allocations is summarised here

Table 7: status of housing allocations

ALLOCATION	REFERENCE	OVERALL SITE STATUS
Keresley SUE	H2:01	UNDER CONSTRUCTION
Eastern Green SUE	H2:02	UNDER CONSTRUCTION
Walsgrave Hill Farm	H2:03	NO APPLICATION
Meggit site Whitmore Park	H2:04	UNDER CONSTRUCTION
Paragon Park	H2:05	UNDER CONSTRUCTION
Land at Browns Lane	H2:06	NO APPLICATION
Land at Sutton Stop (mixed use JE2:8)	H2:07	APPEAL OUTLINE ALLOWED
Land West of Cromwell Lane	H2:08	N/S
Land at London Road/Allard Way	H2:09	AWAITING RESERVED MATTERS
Former Lyng Hall Playing Fields	H2:10	COMPLETE
Elm Fields Farm	H2:11	AWAITING RM
LTI Factory, Holyhead Road	H2:12	FULL PENDING
Grange Farm	H2:13	COMPLETE
Former Transco Site, Abbots Lane	H2:14	APPEAL PENDING
Land at Sandy Lane	H2:15	PENDING OUTLINE

Land at Carlton Road	H2:16	NO APPLICATION
Chestnut and Hawkesmill Nursery Sites	H2:17	COMPLETE
Former Mercia Sports Centre, Kingfield Road	H2:18	COMPLETE
Land at Mitchell Avenue	H2:19	NO APPLICATION
Land at Durbar Avenue (mixed use JE2:7)	H2:20	NO APPLICATION
Woodfield School Site, Stoneleigh Road	H2:21	OUTLINE PENDING
Land at Jardine Crescent	H2:22	APPEAL PENDING
Cryfield Heights	H2:23	COMPLETE
West of Cheltenham Croft	H2:24	AWAITING RESERVED MATTERS
Grange Childrens Home, Waste Lane	H2:25	PENDING

In line with feedback from comments relating to the review Policy H1 we will need to consider whether we should allocate further sites or identify areas where densities could be increased. If you have sites you would like to suggest or promote please do this via your response to Policy H1.

QUESTION 28

Do you have any comments on the review of Policy H2 (Housing Allocations)

Policy H3 Provision of New Housing

New standards to address climate change

We think more stringent standards to address climate change need to be introduced to ensure that net zero targets can be achieved – this issue is discussed under the Environmental Management chapter. This includes the potential to proactively address an increased shift to urban living including through advanced methods of construction including modular build.

QUESTION 29

Do you have any comments, including supporting evidence which can help us address introducing standards which can help us proactively address climate change in terms of residential development?

Other Residential Development Standards

Policy H3 sets out some broad criteria for considering a ‘suitable residential environment’. These include broad accessibility standards, reference to ‘adequate amenity space and parking provision’ and to be safe from environmental pollutants. There is potentially an opportunity to strengthen the policy in terms of amenity and also to reference the recently adopted New Residential Design Guide Supplementary Planning Document, the Open Space SPD, and the Householder Design Guide SPD

Following on from this, in terms of Part 4 of the policy, there is an opportunity to improve the list of criteria to make them more meaningful and useable (for example ‘within 400m of publicly accessible open space’ does not take into consideration how (or if) that space can be safely accessed). It is worth considering whether the established Building for a Healthy Life principles should be used instead, and whether the policy should require

that development proposals should demonstrate how they have taken these into account: see <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>

QUESTION 30

Do you have any comments on our proposals for introducing new policy on amenity?

QUESTION 31

Do you think we should require development to demonstrate how it has taken the Building for Healthy Life Principles into account?

It is considered that 'amenity' also includes living space and its configuration. It is essential that everyone should have the right to a decent standard of living and in areas where high density development is common it is especially important to ensure that living standards are not compromised.

The Government introduced the 'Nationally Described Space Standards (NDSS)' (March 2015) which is a set of optional technical standards for new residential development. These are included at Appendix 2. The space standards are intended to ensure that new homes function properly as such, that there is sufficient circulation and activity space and that basic furniture, fittings and storage space can be accommodated

Given that Coventry is a highly constrained area, with an increased need to accommodate high density development we think there is a strong justification for protecting the health and wellbeing of the City's residents and ensuring that they have suitable accommodation which meets their needs. We therefore propose to formally introduce the Nationally Described Space Standards.

QUESTION 32

Do you have any comments on our proposals to adopt the National Described Space standards

Terminology and new / emerging models of housing

Updates to the terminology in the policy are needed to reflect the most recent Government definitions (for example 'First Homes' instead of 'Starter Homes'). However, we think that there are other opportunities to strengthen this policy (or indeed introduce new policy). We set out our ideas below, for comment, with further detail set out in the Housing Topic Paper.

We consider the need to give more emphasis to different housing types. At present the policy broadly makes reference to 'new residential development' and specific reference to opportunities for self-build and starter homes. There is a separate policy on 'affordable housing' which we review later in this document in line with Government's definition in the NPPF glossary, including affordable housing for rent, starter / first homes, discounted market sales housing and 'other affordable routes to home ownership'. We need to consider how future policy wording can be resilient to any subsequent changes to national policy.

For the purposes of this policy review, however, we focus upon new and emerging models which can be either market or affordable (or both), and which we think should have their own policy.

After this, we also focus upon other potential improvements to policy which we think will assist in delivering better quality proposals.

Build to Rent housing

The NPPF glossary defines Build to rent as *'Purpose built housing that is typically 100% rented out. It can form part of a wider multi tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development'*

We think we should have a policy which supports Build to Rent Schemes, as per paragraph 65 of the NPPF. The HEDNA provides clear justification for this: the target market is a younger demographic and the size of unit would generally be 1,2 or 3 bedrooms although this is not prescriptive.

The NPPF's definition of Build-to-Rent development sets out that schemes will usually offer tenancy agreements of three or more years and will typically be professionally managed stock in single ownership and management control. It is advised through the HEDNA that it would be appropriate for the Council to adopt a consistent definition.

The HEDNA also recommends that the Council will need to consider affordable housing policies specifically for the Build-to-Rent sector. The viability of Build to Rent differs from that of a typical mixed tenure development: returns from the Build to Rent development are phased over time whereas for a typical mixed tenure scheme, capital receipts are generated as the units are completed. The Planning Practice Guidance advises that 20% is a suitable benchmark for the level of affordable private rent homes to be provided and managed in perpetuity. It also states that national affordable housing policy requires that there is a minimum rent discount of 20% for affordable private rent homes relative to local market rents. The HEDNA supports this approach as being applicable to Coventry.

QUESTION 33

Do you have any comments on our proposals to introduce specific policy which supports Build to Rent in Coventry?

Co-Living

Co-living is not defined in the NPPF, however the HEDNA has explored this as, whilst (for the UK) the concept has mainly emerged in London there appears to be growing interest in other cities, including Coventry. Essentially, the model is based around accommodation with shared communal space (kitchen, lounge, social areas). Co living differs from Homes in Multiple Occupation (which tend to be conversions of existing properties, and for which we are producing a separate policy document). Because it is such a new model, the HEDNA looks to the London Plan's adopted policy which recognises that these developments may provide a housing option for single person households who cannot or choose not to live in self contained homes or HMOs. It refers principally to schemes which are generally of at least 50 units and provide an alternative to traditional flat shares and includes additional services and facilities. The target market tends to be a younger demographic.

The HEDNA co-living schemes could be delivered in the main urban areas of Coventry, Warwick and Rugby where there is a core demographic and tenant profile which would align with the target market of co-living housing. These areas are also well connected to local services and transport and would help support the night-time economy in conjunction with the existing student population.

The policy could expect that schemes would be under single management and offer rent with a minimum tenancy of no less than 3 months as well as align with local planning policies and space standards. Other local authorities have encouraged co-living development where it is located next to growth areas or major centres of

employment, it meets zero-carbon objectives, where students are precluded from the development and where it applies maximum tenancy lengths.

The HEDNA comments that it might be prudent to limit the number of co-living developments in the city to enable this emerging model to be evaluated over time.

The HEDNA makes a number of recommendations for a Co-living policy

1. it is of good quality and design and adhere to minimum space standards (The Nationally Described Space Standards, which we refer to later in this section)
2. it is located centrally and is well-connected to local services and employment by walking cycling and public transport, and its design does not contribute to car dependency;
3. it is under single management;
4. The facility has a concierge or other adequate safety and security personnel;
5. its units are all for rent with minimum tenancy length of no less than three months;
6. communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
 - a) convenient access to a communal kitchen with adequate facilities to meet the needs of all residents;
 - b) outside communal amenity space (roof terrace and/or garden);
 - c) internal communal amenity space (dining rooms, lounges) ;
 - d) laundry and drying facilities;
7. the private units provide adequate functional living space and layout, and are not self contained homes or capable of being used as self-contained homes
8. a management plan is provided with the application
9. it delivers a level of affordable housing (discounted private rent) (set at viable levels) or upfront cash in lieu of a contribution towards affordable housing or an annual contribution in perpetuity.

It is our initial view however that properly managed co-living, as with Build to Rent, could help us retain our graduates in the city and deliver much needed homes for the younger generation, and take the pressure off the number of HMOs coming forward. Currently Coventry University has a low graduate retention rate and such provision might enable more young people to remain living and working in the city, as well as attracting other young professionals to the area. However careful consideration would need to be given to how such proposals would be managed so they are distinguished from, and treated separately, to HMOs

QUESTION 34

Do you have any comments on our suggestion to introduce specific policy which supports Co-Living in Coventry?

QUESTION 35

Do you have any comments on whether we should set a limit on how much co-living we should allow so that we are able to review its impact over time given that it is an emerging model? If you think we should, what should the limit be, and what evidence could we use to provide robust and fair justification?

Custom and Self Build housing

The Self-Build and Custom Housebuilding Act 2015 provides a legal definition of 'self-build and custom housebuilding' which is where individuals or associations of individuals (or persons working with or for individuals or associations of individuals) build houses to be occupied as homes for those individuals.

Councils are required to keep a register of people who wish to undertake a self or custom build project in their area. Councils also need to show that they are granting permissions for enough suitable plots to meet the level of demand identified through the register.

Government is keen to advance the custom and self-build agenda, and this was incorporated into the adopted plan through Policy H3 which specifically supports custom and self build where it meets the criteria set out in the policy which includes limited infill within existing ribbon developments within the Green Belt.

In line with National Planning Practice Guidance the HEDNA has considered the issue of Self-Build and Custom Housebuilding for Coventry and Warwickshire. It recommends that the Local Authorities develop a specific policy, and in the areas of highest demand should consider whether to require a percentage of large sites to deliver self and custom plots.

In terms of Coventry, it is our view that it is appropriate for a separate self and custom build policy as this reflects national policy and guidance. However, it is not felt appropriate to require sites to provide a particular percentage of plots given that Coventry is such a constrained city where plots tend to be smaller brownfield sites or form part of wider, higher density regeneration schemes.

Furthermore, in regard to the element of current policy H3 which enables limited infill within existing ribbon developments within the Green Belt we have found this leads to speculative developments in unsustainable locations for example isolated rural sites which are reliant on the car. We therefore propose to delete this element of policy H3 and instead seek to steer self and custom build development to brownfield sites through a positively worded policy.

Another possibility in terms of supporting self build and custom housebuilding is to consider allocating a site, or sites, for this purpose only. The HEDNA proposes that in instances where sites are allocated or the percentage rule applies, there would need to be a fallback mechanism for example if plot(s) have been made available and marketed for at least 12 months and not sold, the plot(s) may either remain on the open market as custom build or be offered to the Council or a Housing Association before being built out by the developer.

We also think that the Local Plan, like the adopted Affordable Housing SPD, should positively support community-led housing schemes, and that reference could be made within this policy area.

QUESTION 36

Do you have any comments on our proposal to introduce a policy on Custom and Self Build Housing?

QUESTION 37

We propose to delete the part of Policy H3 which supports limited infill in the Green Belt as this is contrary to national Green Belt policy. Do you have any comments on this?

QUESTION 38

Do you think we should allocate a brownfield site (s) specifically for self and custom house building? If yes, how might we ensure such a site can be delivered?

QUESTION 39

Do you have any comments on the inclusion of support for Community-Led Housing in this proposed new policy?

Policy H4: Securing a Mix of Housing

This policy sets out a requirement that residential development includes a mix of housing which contributes towards a balance of house types and sizes across the city 'in accordance with the latest Strategic Housing Market Assessment'. The policy lists a range of factors which can also be taken into account including physical constraints, locational issues, severe development constraints which may impact on viability, sites where particular types of development are needed due to a heritage setting, and developments in parish or neighbourhood plan areas where there is an up to date local housing needs assessment.

The NPPF 2021 still requires a mix of housing (both market and affordable) to be delivered, and detail is set out in Section 5 of the Framework. We consider that Policy H4 remains robust within this context. It references the Strategic Housing Market Assessment, whereas the starting point for the mix could now be the Housing and Economic Development Needs Assessment (HEDNA), and it is important that the wording remains flexible in this regard to enable the latest evidence to be referred to given that market needs and Government priorities are likely to change over time and the plan needs to remain resilient and robust.

QUESTION 40

Do you have any comments on our proposed minor revisions to Policy H4 (securing a mix of housing)

Policy H5: Managing Existing Housing Stock

Policy H5 supports renovation and improvement of the housing stock, conversions to residential where this accords with other plan policies, and support for demolition and redevelopment schemes where this can be shown to be sustainable. This still accords with the NPPF in terms of optimising the use of available land (see for example NPPF paragraph 125). Utilising existing stock to ensure it is fit for purpose is an important aim of the climate change strategy, the housing and homelessness strategy and the One Coventry Plan, and is highly pertinent in a constrained and highly populated city environment.

We think this policy wording could be strengthened to include reference to energy efficiency in line with other policies of the plan

QUESTION 41

Do you have any comments on the review of Policy H5 Managing Existing Housing Stock?

Policy H6: Affordable Housing

The Housing Topic Paper sets out the changes to Affordable Housing delivery since the plan was adopted. In this context, the HEDNA analysis of affordable housing need is structured to consider the need for rented affordable housing, and separately the need for affordable home ownership. It should be noted that the need estimate is on a per annum basis and should not be multiplied by the plan period to get a total need. Essentially, the estimates are for the number of households who would be expected to have a need in any given year (i.e. needing to spend more than 30% of income on housing), and this does not necessarily need to be met by new build. The HEDNA concludes that there is:

- A net need of 941 Social / Affordable rental housing per annum for Coventry (HEDNA Table 8.15);
- A net need of 149 Affordable Home Ownership dwellings per annum (HEDNA Table 8.27).

Having determined the net need, it is important that policy H6 reflects the changes to the NPPF since the Local Plan was adopted. NPPF paragraph 64 sets out that only 'major developments' (i.e. 10 or more homes) should require affordable housing. The NPPF gives a clear direction that 10% of all new housing (on these major sites) should be for affordable home ownership. Councils will be able to specify the requirement for any remaining affordable homes, provided that at least 10% of ALL of the housing on a given site is for Affordable Home Ownership. The HEDNA emphasises that 'it will be important for the Councils to ensure that any affordable home ownership is sold at a price that is genuinely affordable for the intended target group – for example there is no point in discounting a new market home by 30% if the price still remains above that for which a reasonable home can already be bought in the open market.' (para 8.109).

In terms of the remaining provision of affordable on site which can be viably provided, the HEDNA states that this will need to be down to a range of factors including council priorities and viability evidence.

The Council believes that affordable home ownership should be affordable with the principle that it is intended for those that cannot meet their needs through the open market. The Council will need to consider how this is achieved for the various models including setting local criteria for First Homes (including consideration of whether Key Workers should be included), how it sets the maximum income levels and whether it wants to include a maximum property price for affordable home ownership products. Shared ownership is done through the Help to Buy agent and who assesses whether the applicant can afford home ownership without assistance. Further work will need to be undertaken in this regard, but policy wording will need to be flexible to allow for changing market circumstances and government and local priorities over the plan period.

The current Local Plan percentage requirements for affordable rented and affordable home ownership can absorb the government requirement for 10% of homes to be for affordable home ownership. The new requirement of government for 25% of the overall affordable home proportion (so for our policy – 6.25% of the overall number) to be specifically First Homes can be accommodated within the existing percentage requirements. However, the HEDNA does highlight the importance of maximising the amount of social/affordable rented properties.

We think there is an opportunity to specify in the policy that social rent is the Council's preferred option for the rented proportion of the developer contributions.

Point 7 of the Policy is considered very important to retain the ability to influence the property types and sizes using evidence such as the Homefinder register.

The value areas map is still considered important and relevant (to enable more mixed communities in areas where there is currently a large proportion of affordable homes or conversely, not many affordable homes) and the area categories still seem correct based on the Council's general knowledge of the city, but the map will need updating to ensure it reflects the most up to date position.

An updated viability assessment for the Local Plan will need to be prepared as the Local Plan review work advances, and ensuring an appropriate level of affordable contributions from developers will be key taking all of the previous information to account as well as factoring in a range of other priorities for the Local Plan.

QUESTION 42

We propose that the policy should be updated to reflect the Council's preference for Social Rent as opposed to Affordable Rent. Do you agree

- A. Yes – please comment further if you wish
- B. No – please explain

The Council believes that affordable home ownership should be affordable with the principle that it is intended for those that cannot meet their needs through the open market. The Council will need to consider how this is achieved for the various models including setting local criteria for First Homes (including consideration of whether Key Workers should be included), how it sets the maximum income levels and whether it wants to include a maximum property price for affordable home ownership products.

QUESTION 43

Do you have any comments on our proposals regarding affordable home ownership? What evidence do you think we should use?

QUESTION 44

Do you have any other comments on the review of Policy H6 Affordable Housing including issues and evidence relating to viability which we need to consider

Policy H7: Gypsy and Traveller Accommodation

Permanent residential pitch provision

A new Gypsy and Traveller Accommodation Assessment was completed in February 2023. This has shown that the policy needs updating to reflect current circumstances. The GTAA concludes that there are currently 5 authorised pitches on Burbages Lane and an expected supply of 12 pitches following the redevelopment of the Siskin Drive site. This is able to cater for the assessed need (15 pitches) over the short term 2022/23 to 2026/27.

Over the longer plan period to 2041 the GTAA concludes there will be a shortfall of 6 pitches but that these could potentially be accommodated at Burbages Lane.

In order to provide resilience over the plan period the GTAA also recommends a series of requirements which should be taken into account when assessing planning applications and recommends that the criteria in policy are updated to include:

- The site is in a sustainable location in terms of accessibility to services and facilities, including health and schools.
- The site is suitable in terms of vehicular access to the highway, parking, turning, road safety and servicing arrangements and has access to essential services such as water supply, sewerage, drainage and waste disposal.
- Appropriate screening and landscaping is included within the proposal to protect local amenity and the environment.
- The site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplains.
- They promote peaceful and integrated co-existence between the site and the local community.

- They enable mixed business and residential accommodation (providing for the live-work lifestyle of Travellers).
- They avoid undue pressure on local infrastructure and services.
- The proposal is well related to the size and location of the site and respects the scale of the nearest settled community.
- Proposals make adequate provision for on-site facilities that meet best practice for modern Traveller site requirements, including play areas, storage, provision for recycling and waste management.

Transit arrangements

In terms of transit arrangements, the GTAA recommends that the Council develops a negotiated stopping policy to help deal with the number of unauthorised encampments which arise at particular times. However, it is our view that this kind of policy sits outside the scope of the Local Plan, unless it would require identifying a particular permanent site, in which case the above provisions would be applied in assessing any such planning application.

QUESTION 45

Do you have any comments on our review of Policy H7, Gypsy and Traveller Accommodation?

Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation

Policy H8 currently deals with the housing needs of an ageing population – and those requiring care - by setting out policy which supports care homes, supported housing, nursing homes and older persons accommodation.

The Housing topic paper sets out how the HEDNA has considered the issue, and then raises a series of additional issues for consideration.

Specialist housing for older and disabled people

Firstly, the HEDNA analysis responds to Planning Practice Guidance on *Housing for Older and Disabled People* published by Government in June 2019 and includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards).

The data shows in general that Coventry has a younger than average age structure (and higher age-specific rates of disability in a regional/national context). The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-32 period include:

- A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth;
- A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems;
- A need for around 1,960 housing units (mainly affordable) with support (sheltered/retirement housing)
- A need for around 230 additional housing units with care
- A need for around 180 dwellings per annum to be for wheelchair users (meeting technical standard M4(3)).

This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. Given the evidence, the HEDNA comments that the Council could consider (as a start point) requiring all [new] dwellings (all tenures) to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and 10%+ of homes meeting M4(3) – wheelchair user dwellings (with a higher proportion in the affordable sector).

Where the authority has nomination rights M4(3) would be wheelchair accessible dwellings (constructed for immediate occupation) and in the market sector they should be wheelchair user adaptable dwellings (constructed to be adjustable for occupation by a wheelchair user). It should however be noted that there will be cases where this may not be possible (e.g. due to viability or site specific circumstances) and so any policy should be applied flexibly.

The HEDNA advises that the Council should also consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

In seeking M4(2) compliant homes, the Council should also be mindful that such homes could be considered as 'homes for life' and would be suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.

QUESTION 46

Do you have any comments on the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards)? Please provide evidence to support your views.

It has been suggested that the locational requirements contained within this policy are different to those applied to general housing in policy H3, but a matter for consideration would be whether or not sustainable locational requirements should actually be consistent across all residential dwellings, for example in line with the proposed introduction of the Building for a Healthy Life criteria⁵.

In framing policies for the provision of specialist older persons accommodation, the Council will need to consider a range of issues. This will include the different use classes of accommodation (i.e. C2 vs. C3) and requirements for affordable housing contributions (linked to this the viability of provision). There may also be some practical issues to consider, such as the ability of any individual development being mixed tenure given the way care and support services are paid for.

QUESTION 47

Do you have any other comments on our review of Policy H8?

Policy H9: Residential Density

Policy H9 sets policy standards for minimum densities which will make the most effective and efficient use of land 'whilst ensuring compatibility with the quality, character and amenity of the surrounding area'. Outside of the ring road (A4053) this is a minimum of 35 dwellings per hectare (dph), inside the ring road a minimum of 200 dph, and greenfield sites 30dph.

⁵ <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>

Given the government's 'brownfield first' policy, the continued need to use land effectively and the fact that these standards are minimum adopted standards, we think there is an option to conclude that this policy remains up to date.

However, there is also an opportunity to consider whether we could set density minimums outside the ring road in certain locations to maximise capacity.

QUESTION 48

Do you consider:

- A. The policy is up to date and sets sufficient standards to maximise capacity already
- B. The policy could be amended to increase minimum density levels in certain locations outside the ring road? (please explain and provide evidence where applicable)

Policy H10: Student Accommodation

Policy H10 actively supports Purpose Built Student Accommodation and conversions of residential and non-residential properties where it is directly accessible from the universities, plays a part in regenerating neighbourhoods without disadvantage to local services, will not materially harm the amenities of occupiers of nearby properties and where it will reflect and support or enhance the appearance and character of the area.

Since the plan was adopted, monitoring has shown significant growth in PBSA in the city although this is expected to be a short term peak. Notwithstanding this, the HEDNA does state that the situation should be reviewed as the University's growth ambitions take shape (see Housing Topic Paper), as it has not been possible to quantify levels of need for the future at the present time.

It is important that the universities continue to be supported, they play a key role in the local and regional economy, and PBSA provides an important accommodation for students. Furthermore, PBSA can take the pressure off the need for other forms of student housing such as Homes in Multiple Occupation which come with a different set of challenges and for which a separate Development Plan Document is being developed to help manage the issue.

However, PBSA should not become the predominant form of housing in the city centre. Other types of high density development are much needed to help deliver a range of homes to meet local needs for example co-living, build to rent, and a range of other market and affordable products.

Therefore, we think that the wording of the policy should be updated to allow for a more nuanced approach which allows for PBSA to be considered on its merits, and subject to a clear demonstration of need at a particular point in time and whether that need can be met without compromising other aspects of the Local Plan. Consideration needs to be given as to how policy might achieve such an approach using the principles of 'monitor and manage'.

Furthermore, the term used in policy (Part 1a) currently is that PBSA should be 'directly accessible from the universities'. We consider this to be too ambiguous as, for example, this could still encourage remotely located provision should it be 'directly accessible' via a road, bus or rail route. We think it would be better to say 'located within or to the edge of campus' to support sustainably located development.

Because of the increased pressure resulting from the conversions of residential dwellings to HMOs again we think each case needs to be considered on its merits in accordance with the new Homes in Multiple Occupation DPD.

We therefore suggest that the policy could be reworded accordingly:

1. *Purpose-built student accommodation and conversions of residential and non-residential properties to student accommodation will be considered on their merits. For HMOs proposed conversions will be assessed in line with the HMO DPD. For PBSA applications will be assessed in line with a monitor and manage approach which will consider whether PBSA is helping to deliver a balanced housing market, and where a clear demonstration of need can be shown. If this is accepted applications will be supported where:*
 - a. *They are located within a fifteen minute walk time to the edge of the campus*
 - b. *Such development can play a part in the regeneration of the immediate neighbourhoods without*
 - c. *disadvantage to local services.*
 - d. *It will not materially harm the amenities of occupiers of nearby properties; and*
 - e. *It will reflect and support or enhance the appearance and character of the area.*
2. *To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement or other appropriate mechanism.*

QUESTION 49

Do you have any comments on our review of Policy H10?

We are considering a 'monitor and manage' approach to PBSA in Coventry to enable us to recognise the Universities' growth plans and ambitions whilst ensuring that this does not undermine our strategy to achieve a balanced housing market

QUESTION 50

Do you have any comments on a 'monitor and manage' approach, including how this could be implemented, or any alternative ways of managing delivery which can be supported by robust evidence?

We are also considering a range of other matters in terms of ensuring that PBSA meets the needs of its intended residents, that it delivers inclusive, safe and sustainable communities, and that it is well designed having regard to amenity and space standards, sustainable construction (including grey water development, 'living walls' green roofs, space-saving underground recycling facilities and the provision of appropriate facilities (for example a place to wash and dry laundry, shared and well maintained social space and space for preparing and eating food). We also want to ensure that student accommodation is genuinely affordable and inclusive.

QUESTION 51

Do you have any examples of policy or evidence which would help us develop a policy relating to standards for student accommodation, to include matters of design, amenity, sustainability and mechanisms to ensure that it is truly inclusive for students from all backgrounds including the potential need for developer contributions to secure affordable tenures.

QUESTION 52

Do you have any other issues you think we should be taking into account when planning for student housing

Policy H11 Homes in Multiple Occupation (HMOs)

Coventry City Council is currently developing a new HMO Development Plan Document which will provide new policy for HMOs. At the time of writing this was due to be submitted for examination.

We therefore think there is potentially no future need for this policy. We propose to delete H11 provided that the HMO DPD is adopted. For continuity however we would propose to add a section in to Policy H3 (Provision of new Housing) to ensure that the Local Plan and the HMO DPD are appropriately cross referenced.

QUESTION 53

Do you have any comments on our proposal to delete Policy H11 and instead make sure the Local Plan cross references to the HMO Development Plan document

Chapter 6: Retail and Centres

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

The One Coventry Plan seeks to build on the strength of the City's economy to deliver inclusive growth and work with and support existing businesses to innovate, grow and scale up. The One Coventry Plan is also committed to the city centre and ensuring this is of a high standard offering a diverse range of experiences for residents and visitors. In conjunction with Chapter 4, the Jobs and Economy policies, the Local Plan will promote this corporate approach as part of Chapter 6, Retail and Centres policies, by continuing to promote the vitality and viability of the city's existing centres by supporting commercial and business uses within them, while working within the parameters of Central Government's changes to the use classes order.

The Local Plan's approach and support for retail and centres will address a number of pathways in the Coventry Climate Change Strategy as centres diversify, evolve and adapt to the change in retail patterns and what residents now expect from their centres. This is especially relevant given Central Government's changes to the use classes order. Chapter 6 of the Local Plan will address the low emissions and circular economy pathways as addressing these issues will result in new economic opportunities being created. It will also address the resilient pathway as by reducing the risks of climate change and extreme weather events such as flooding, heatwaves and droughts will allow the city to function more sustainably and more self-sufficiently having a positive impact on businesses and the city's centres.

Planning context

Many changes have taken place within the retailing sector since the adoption of the Local Plan 2017. There is now an opportunity to revise outdated retailing policies to reflect recent changes in this sector.

To aid in the review of the Local Plan, specialist evidence has been commissioned to help give an up-to-date picture of the current situation. The Retail and Centres study will be divided into two parts. Phase one, commissioned to inform the first stage of the Plan Review, provides a broad overview around a direction of travel in relation to the retail sector, national changes across the sector including online and delivery and future quantum of floorspace and use class provision in Coventry.

Phase two of the study will provide further detail of Coventry's hierarchy of centres. It will also make recommendations in relation to both the hierarchy and wider retailing policy. This will be produced to inform the next stage of the plan making process and will take account of comments received through the Regulation 18 consultation.

The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. With effect from 1 September 2020, Classes A and D of the existing Use Classes Order were revoked and Class B1 was omitted with a new Schedule 2 being brought into effect, providing for new use classes, summarised as follows:

- Class E Commercial, Business and Service
- Class F1 Learning and Non-Residential Institutions
- Class F2 Local Community
- Sui Generis: "in a class of its own"

The government states that the main driver of this change has been the need to enable a repurposing of buildings on high streets and town centres. The new use classes allow for a mix of uses to reflect changing retail requirements. It will allow a building to be used flexibly by having a number of uses taking place concurrently or by allowing different uses to take place at different times of the day. Changes to another uses, or mix of uses, within this class will not require planning permission.

A Sui Generis use will usually be subject to full local consideration through the planning application process. Although not exhaustive, some examples of Sui-Generis uses are: Drinking establishments, hot food takeaways, live music/performance venues, amusement/gaming/betting shops, fuel stations and car hire/sales.

Overarching Retail Policy approach

Given the changes discussed above, and the increased flexibility around Permitted Development (so there will be much more change which does not need planning permission) we consider that it is more appropriate to base retail policy around the broader categories of Convenience, Comparison and Service.

QUESTION 54

Do you have any comments on our view that removing references to use classes and using the terminology of Convenience, Comparison and Service is appropriate?

With ever changing retail patterns, high street demand and online shopping, the ability to forecast the need for retail floorspace is challenging in the long term. As such, the figures in the current Local Plan are based on a 2014 retail study, informed by the 2011 Census and Coventry City Council Land Use Survey (2013). While it is common for Local Plans to state capacity figures for new retail and leisure floorspace in policies that seek to prioritise new development in town centre locations, such as current Local Plan Policy DS1 (Overall Development Needs), and AAP Policy CC18 ('The Primary Shopping Area'), any figures identified from Stage 2 of the new Retail and Centres Study are likely to show that there is limited capacity for new floorspace.

It is difficult to predict how the retail markets will evolve given the considerable changes that have occurred within a short period of time. Furthermore, the absence of capacity figures will not correlate to a lack of demand from the market, which the Stage 2 study is expected to identify, particularly within the convenience retail sector where there is strong demand from the sector for new discount foodstores. At this stage it is advised that reference to capacity figures are not stated and should be informed by a holistic overview of the retail context for Coventry by taking account of market led demand within the retail and leisure sectors.

QUESTION 55

We think that references to floorspace figures should be removed to enable a more organic approach to retail development within the defined centres. Do you have any comments on this?

Policy R1: Delivering Retail Growth

This policy defines a series of allocations which include retail within their site, their intended uses and quantum of floorspace.

As discussed above. Part two of the Retail and Centres study will provide detail on the hierarchy of centres within Coventry. It will provide more commentary and make recommendations for any future revisions to the centres hierarchy.

QUESTION 56

Do you think the centres listed in this policy remain fit for purpose and should be retained as allocations within this policy?

We consider that Arena Park Major District Centre has reached a scale of provision which is sufficient for a Major District Centre and any further expansion in this location would not be supported without robust justification. We are mindful that the area is a key tourist attraction and in-order to support that we suggest a minor addition to include tourism in the final paragraph of this policy:

“Further retail provision at Arena Park MDC will not be supported during the plan period unless it is demonstrated that there will be no significant impact on the city centre or that the proposal is an essential element of supporting wider “tourism” and leisure functions.”

QUESTION 57

Do you have any comments on a potential change to policy wording to include tourism in relation to the Arena Park Major District Centre?

Policy R2: Coventry City Centre – Development Strategy

The City Centre is at the heart of the retail hierarchy in Coventry. It provides a sub-regional focus for both retailing and culture, leisure and tourism. Policy R2 of the Local Plan sets out the overarching strategy for city centre development and enhancement of the sub-regional centre.

We consider this policy to remain relevant and necessary within the Local Plan but suggest two changes to bring it more up to date.

Firstly, we suggest the addition of a reference to limit the disproportionate concentration of Sui-generis uses within frontages. This is particularly challenging in certain parts of the City Centre, such as the Burgess, where concentrations of SUI generis uses dominate the frontages. This challenge can be mitigated by identifying primary shopping areas, which is discussed later in this section.

Secondly, in light of the on-going review we suggest the removal of part two of this policy which references the development of a City Centre Area Action Plan as the adopted AAP is being reviewed alongside the Local Plan and we are asking for feedback on how to address the matter (See Chapter 14).

QUESTION 58

Do you have any comments on the insertion of a reference to limit the disproportionate concentration of sui-generis uses within frontages?

Policy R3: The Network of Centres

Defined centres play an important role across Coventry. They provide retail and leisure provision to local communities and are often located in some of the most sustainable locations. This policy defines the network of centres across the city. Major District Centres at the top of the hierarchy, followed by District Centres and then

Local Centres. Each level of centre provides for different city wide, district and local convenience, comparison and service uses.

Given changes in the use classes order, we propose to amend the final paragraph of part five of this policy (Local Centres) to read ...'day to day convenience shopping and proportionate main town centre uses'. This reflects the fact they are local centres and often are of a small scale and serve a local role in the community.

QUESTION 59

Do you have any comments on the proposed changes to the above paragraph?

As part of ongoing work with our consultants we will be re-visiting the hierarchy of centres and considering if the centres currently defined in the Local Plan remain fit for purpose.

QUESTION 60

With the above in mind, do you have any comments on whether the centres listed in this chapter of the Local Plan remain fit for purpose, or should changes to the hierarchy and/or defined centres be made?

Policy R4: Out of Centre Proposals

Paragraph 86 of the National Planning Policy Framework (NPPF) states that policies should define the extent of town centres and Primary Shopping Areas (PSAs). The expectation in national policy that primary and secondary frontages need to be defined in the NPPF was removed in 2018. Although, the National Planning Practice Guidance clarifies that this does not preclude authorities from doing so where their use can be justified. Furthermore, the introduction of an amended Use Class Order now renders policies on primary and secondary frontages difficult to implement, given the flexibility now afforded to commercial activities within this new Use Class.

For the purpose of assessing the sequential and impact tests for retail proposals at locations that are not within a defined centre the NPPF classifies such locations as either being edge of centre or out of centre. Edge of centre is defined in the NPPF as "a location that is well connected to, and up to 300 metres from, the primary shopping area" (Glossary, NPPF)

Policy R4 of the Local Plan sets out the requirements for assessment of both impact and sequentially preferable sites, should an application for a main town centre use be submitted outside or on the edge of a defined centre.

Part one of this policy states: *Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).*

We consider that this part of the policy should include reference to hot food takeaways and therefore we propose the following wording:

Therefore, we propose that part one of the policy be amended to read: *Proposals for retail, Main Town Centre uses and **hot food takeaways** (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).*

In light of the above changes to the NPPF we consider part 2b of the policy should be updated to include Primary Shopping Areas. Therefore, we think that part 2b of this policy should be amended to read:

“Primary Shopping Areas will be identified for the City Centre, Major District Centres and District Centres. The following will apply to the City Centre, Major District Centres and District Centres.

In relation to retail proposals: where in-centre options are exhausted, edge of centre locations (within 300m of a defined Primary Shopping Area) that are well connected and accessible to the centres themselves should be considered in advance of out of centre sites. When considering other main town centre proposals, 300m from a defined centre boundary will be used. Primary Shopping Areas will be defined on the policies map for the City Centre, Major District Centres and District centres.”

“Primary Shopping Areas will not be defined in Local Centres due to their scale. Therefore, when considering edge of centre locations close to local centres, 300m from a defined boundary will be used.”

NB - Part 3a: Impact Assessments, will be reviewed following updated evidence as part of the second phase of retailing evidence.

QUESTION 61

Do you have any comments on whether part one of Policy R4 should include reference to hot food takeaways?

QUESTION 62

Do you have any comments on the creation of primary shopping areas in the City Centre, Major District and District Centres?

QUESTION 63

Do you agree with our suggestion that due to their scale, Local Centres should not have primary shopping areas defined and should use the centre boundary for all elements of sequential assessment?

Policy R5: Retail Frontages and Ground Floor Units in defined centres

When considering uses within the centres hierarchy this is generally focused towards the ground floor of units. As such, the ground floor element of these units is of primary importance as they offer the ‘shop windows’ for the centre. However, given the use classes order has changed significantly, we consider this policy to be no longer necessary, especially in light of the broad spectrum of uses which can occupy an E class unit without needing planning permission.

QUESTION 64

Do you agree with our suggestion that this policy (Policy R5: Retail Frontages and Ground Floor Units in defined centres) should be deleted?

Policy R6 Restaurants, Bars and Hot Food Takeaways

The Council has pledged to improve its population’s health and wellbeing and to reduce health inequalities. One of the challenges the Council faces in promoting healthy eating is the availability of foods high in fat, salt and sugar in local neighbourhoods, including the prevalence of hot food takeaways in some areas. Such uses do, however, have the potential to cause significant problems with impact upon residential amenity, highways and parking. Hot food takeaways often attract considerable customer numbers and are regularly associated with issues such as litter, waste disposal, noise, odour, traffic and health. For a combination of these reasons, they will

normally only be supported within defined centres where residential amenity is less likely to be an issue and will be resisted elsewhere. Where homes are situated above such premises, specific care will need to be given to odour extraction, noise insulation and general public convenience. Where appropriate provisions cannot be included then such uses will not be supported, even within designated centres.

Given changes to the use classes order and the inclusion of restaurants within class E, we no-longer consider it relevant to include restaurants in this policy, as planning controls on the use of a restaurant in a particular unit are limited.

We consider that the term 'normally' in part one of this policy should be removed, in order to remove ambiguity and aide clarity.

We propose that Part C should be slightly amended to refer to the 'adopted' Hot Food Takeaway SPD or any replacement.

QUESTION 65

Do you agree with our proposals for the deletion of 'normally' and to add in 'adopted' where suggested?

We consider reference should be made to the 5 minute walk school exclusion zone. We suggest that the following wording might be helpful:

"Hot food takeaway applications will not be approved if the hot food takeaway falls within a 5 minute walk from the gate(s) of any primary or secondary school (including any Special School, Sixth Form College and Academy), within or outside Local Education Authority Control."

QUESTION 66

Do you have any comments on our suggestion that reference should be made to the 5 minute walk school exclusion zone?

Potential new policy: Local services

The traditional hierarchical approach to town centres, as set by national policy, does not address the importance of local parades of shops and services, nor does it facilitate their protection.

We think this is an extremely important matter however. During the lockdowns of Covid 19 people became increasingly dependent upon walking to their local shop for basic goods and services, and being able to access goods and services locally. Walking and cycling to access a range of local services is extremely important for healthy, balanced and sustainable communities, encouraging social interaction and physical activity and reducing the need for travel by car especially for short journeys. We address this issue in a number of topic areas (health, and communities) and we want to ensure there is policy protection for these smaller parades of shops where there are no alternative easily walkable locations nearby.

We are interested in your views as to how such a policy might work in practice, and where it should sit within a reviewed Local Plan. To aid discussion, we suggest some possible policy wording in relation to Local Parades:

Shops and Parades Outside Defined Centres – possible policy wording

1. Development proposals that enhance the community function of shops and parades located outside centres defined on the Policies Map will be supported.
2. Where it is proposed to change the use of a shop outside a centre, an assessment will be made of its value to the local community. If the shop fulfils a function of benefit to the local community, development proposals must provide credible and robust evidence of an appropriate period of marketing for retail use.
3. Where evidence suggests that a shop does not fulfil a function of benefit for the local community, or where a community benefit exists to changing to another use, marketing evidence will not be required.

QUESTION 67

Do you have any comments on our proposal? Have you any examples of a policy which protects local shopping parades?

Chapter 7: Communities

Preamble - the City's priorities for communities and addressing climate change

The One Coventry Plan seeks to improve outcomes and tackle inequalities within communities and highlights the challenges of an aging population. To do this the plan recognises the importance of delivering essential services that matter most to the city's communities and supporting health educational and support services.

Strengthening the City's Marmot City strategy is also at the heart of the One Coventry Plan's approach to tackle inequalities within communities. While historically Coventry has been one of the youngest cities in the UK with a fast-growing population of young adults aged 18-29, this is expected to change rapidly with 65+ age group expected to become the fastest growing demographic over the next 15 years. As well as being able to draw on the experience and talents of older people, the change in demographic has implications for many services and health and social care services. The Local Plan will support the corporate approach to communities by retaining the policies that protect existing and support new social community facilities.

While the five pathways in Coventry's Climate Change Strategy are in relation to creating a sustainable zero carbon city, the opportunities for enhancing community services and facilities exist within the resilient pathway to ensure the city can better respond to climate change and extreme weather events; and the equitable and people centred pathway to deliver inclusive urban communities and to enhance biodiversity and urban ecosystems within community facilities.

Policy CO1 New or improved social community and leisure premises

In providing social, community and leisure services the NPPF requires local authorities to plan positively for the provision and use of shared spaces, community facilities (such as meeting and sports venues, cultural buildings and places of worship) and other local services to enhance the sustainability of communities and residential environments. In doing so Local Plans should guard against the unnecessary loss of valued facilities and services, allow established facilities to develop and modernise in a sustainable way and ensure that the location of housing, economic uses and community facilities and services are considered and promoted in an integrated way.

This policy sets out a sequential approach to the assessment of such proposals and based on the duration of time this policy has been in place, feedback from stakeholders suggests the policy is helpful and provides a useful way of assessing such proposals allowing sufficient scope and flexibility to make informed decisions.

QUESTION 68

Do you have any comments on our review of Policy CO1?

Policy CO2 Re-Use of or Redevelopment of Facilities

We believe the scope of this policy needs to apply to community uses beyond the current definition of 'community premises'. Some uses (for example pubs which would normally be defined as a main town centre use) might provide a significant social hub for a local community, and a local shopping parade (which sits outside of the traditional hierarchy of centres) might provide an essential, walkable resource for everyday needs for a community (a matter which became especially significant during the Covid-19 lockdowns). Policy should be flexible enough to enable assets to be recognised in terms of their importance to a local community, and the role

they play in reducing reliance upon car-bourne transport. This is especially important with an ageing population, and to support inclusivity and access to services for all.

It is suggested that proposals involving the loss of land in use, or previously in use, by an education facility will only be supported, if it is clearly demonstrated to be surplus to educational requirements and its development for other uses would contribute to improvements in the delivery of school places in the city. Where replacement facilities are intended, they should be located in accessible locations. The quality of new provision should be equivalent to or exceed what is being replaced.

Where premises have been registered with the Council as assets of community value under the Localism Act 2011, it is proposed that this will be a material consideration in the determination of applications for change of use to non-community related use. Feedback from stakeholders and decision makers suggests the policy is helpful and provides a useful way of assessing such proposals allowing sufficient scope and flexibility to make informed decisions.

QUESTION 69

Do you have any comments on our suggestions for amending Policy CO2

Policy CO3 Neighbourhood and Community Planning

Neighbourhood planning is not a legal requirement but a right which communities in England can choose to use. Communities may decide that they could achieve the outcomes they want to see through other planning routes, such as incorporating their proposals for the neighbourhood into the local plan, or through other planning mechanisms such as Local Development Orders and supplementary planning documents or through pre-application consultation on development proposals. Communities and local planning authorities should discuss the different choices communities have to achieving their ambitions for their neighbourhood.

This policy is proposed to be updated in a minor context to bring it up-to-date in respect of the terminology used so that is reflective of the current position as set out in the NPPF (2021) and associated practice guidance (neighbourhood planning).

QUESTION 70

Do you have any comments on our view that Policy CO3 needs a minor update as described?

Chapter 8: Green Belt and Green Environment

Preamble - the City's priorities for the green environment and addressing climate change

The One Coventry Plan recognises the importance of the green environment for improving outcomes and tackling inequalities around the city and in tackling the causes and consequences of climate change. The One Coventry Plan seeks to continue to promote the use of the city's parks and green spaces to help create connections between communities and promote physical activity.

The Coventry Climate Change Strategy recognises that the city has some of the lowest levels of access and use of open spaces, especially in relation to deprived areas, in the region, if not the country. The Equitable and People Centre pathway seeks to create new accessible open spaces in recognition of this fact and also in the effort against climate change which would align with the suggestions for the Local Plan.

Furthermore the Climate change strategy specifically requires the Local Plan to 'further protect and enhance biodiversity'.

Chapter 8 of the local plan would also address the nature based pathway which seeks greater importance to be placed on biodiversity through the planning system with major opportunities sought through the advancement of biodiversity Net Gain for investment in habitat creation and the linking up of areas of biodiversity value with network and wildlife corridors. The strategy also places greater emphasis on improving conservation management of areas of open space. The low emissions pathway will also ensure improved area quality around the city's parks and open spaces.

Policy GB1 Green Belt and Local Green Space

Green Belt policy and Local Greenspace policy are two different types of policy designation both with very high levels of protection.

Green Belt

In terms of the Green Belt the National Planning policy Framework (NPPF) paragraph 138 sets out the Five Purposes of Green Belt:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Policy GB1 established the boundaries for the Green Belt including a list of sites which were removed from the Green Belt in order to accommodate the City's growth needs. Much of the policy duplicates national policy and we think we need to ensure the wording is consistent to avoid potential confusion.

Local Green Space

Local Green Space is designated differently to Green Belt. The NPPF (paragraph 102) states that it can only be designated where it is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land

However, the level of protection afforded to local Green Space (once designated) is similar to that of Green Belt land.

We suggest that Green Belt and Local Green Space merit their own individual policies.

QUESTION 71

Do you have any comments regarding Policy GB1?

QUESTION 72

Do you think that Green Belt and Local Green Space should be covered in two separate policies?

Policy GB2: Safeguarded land in the Green Belt

The National Planning Policy Framework 2021 sets (in paragraph 143) out the context for 'safeguarding' land – ie removing it from the Green Belt 'to meet longer-term development needs stretching well beyond the plan period'. In line with Paragraph 143 part d, safeguarding does not allocate the land for development, such an allocation can only be made through the process of plan review, as explained in Policy GE2.

This policy identifies a number of sites stating that they will be 'subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District'.

The explanatory text to Policy GB2 states that the sites in question (Land south of Westwood Heath Road, Land south of Bishop Ullathorne School, Playing Field south of Finham Park School and Land West of Finham Primary School) were safeguarded to ensure flexibility (at that time) to be able to respond to changing circumstances in the Local Plan being developed by Warwick District Council at that time. At the time, they formed part of wider Green Belt parcels which crossed the boundary between Coventry and Warwick District.

Warwick District Local Plan (WDLP) was adopted in September 2017. The implications for the safeguarded land in Coventry is as follows:

- In respect of 'land south of Bishop Ullathorne School', 'playing field south of Finham Park School' and 'land west of Finham Primary School', these all abut land at Kings Hill (Warwick District Local Plan 2011-

2029 allocation H43). The Kings Hill site was allocated in the WDLP for housing and taken out of the Green Belt

- In respect of 'land south of Westwood Heath Road' this abuts land that is also safeguarded in the Warwick District Local Plan (policy DS21 – S1 'Land south of Westwood Heath Road). Any decision on whether to allocate this land within Warwick District for housing will be made as part of the South Warwickshire Local Plan that is currently in preparation. This plan is in its early stages of development (it has been through the Regulation 18 'Issues and Options consultation but no decisions have yet been made).

In terms of the future of the safeguarded sites, this will be a matter for Coventry City Council to consider in the light of more detailed evidence on capacity and prioritisation of brownfield sites to deliver on the growth needs of the City, as set out elsewhere in this document, and this evidence will be prepared as the plan progresses to the next stage following the Issues and Options consultation, and in line with cross boundary discussions under the statutory Duty of Co-operate.

QUESTION 73

Do you have any comments of the review of Policy GB2?

Policy GE1 Green Infrastructure

Policy GE1 bases the assessment of, and provision of Green Infrastructure on the most up to date version of the Green Space Strategy. Further detail is provided in the Open Space Supplementary Planning Document which was adopted in March 2022.

However, we think that, linked to the Climate Change and Health agendas (and as set out in the Green Infrastructure and Biodiversity Topic Paper, along with the Climate Change Topic paper and the Health Topic Paper) the policy needs to be strengthened as proposed below.

We think Policy GE1 part 1 should be expanded:

- to cover Woodlands, Veteran trees and Candidate Veteran Trees featuring similar wildlife habitat features.
- to preserve species which are legally protected, in decline, are rare, provide veteran-tree quality wildlife habitat features, such as cavities, holes, significant deadwood, dead bark, rot, fluxes, split limbs, stubs and so on

We propose that Policy GE1 part 2 should identify key corridors for enhancement and to propose targets for connectivity across the city in line with LNRS requirements, and WMCA policy and create new green spaces to enhance biodiversity and improve access to green space.

We think that GE1 part 3 should be expanded to:

- emphasise the importance of green space to health and climate change, as done in the Open Space SPD
- identify key areas with the least green space, and highest levels of health and climate vulnerability, and addressing disparities by creating new green spaces and traffic calming measures like street trees.
- set targets to increasing their canopy and green space coverage, and ANGSt levels and 3-30-300 all in-line with the Urban Forestry Strategy, and broader Urban Nature Recovery Standard, the Urban Greening Factor and the Urban Tree Canopy Cover Standard

- link to natural capital and ecosystem services, for example the impacts of green infrastructure improvements on climate resilience through urban cooling, and flood management, focusing on nature-based solutions to issues like flooding and traffic congestion, with green SuDS
- identify the need to frequently baseline and re-assess biodiversity, green infrastructure and tree canopy cover levels, and enforcement of nature management plus targets needed for the future. Changing the LEMP elements to require proof of long-term monitoring and reporting, this should echo LPA monitoring.

We do not propose any changes to GE1 part 4.

GE1 part 5 should require increases in tree coverage, wildlife-friendly buildings, and new green spaces.

We do not propose any changes to GE1 part 6.

In terms of how we would potentially achieve these proposed changes, the topic paper explains the evidence we would require to set a baseline against which targets would be measured.

In terms of implementing the proposals we suggest that a suite of options could be developed with different types and scales of development. For example one bird/bat/insect box for every dwelling could work as a flexible alternative, or full applications having to achieve the urban greening factor, with 30% green coverage on commercial developments and 40% on residential developments and urban tree canopy cover standards, which we could agree locally, but are normally 30% canopy coverage. To achieve such standards we could provide guidance on methods, using case studies and showing calculations, to make it easy to understand

QUESTION 74

Do you have any comments on our review of Policy GE1: Green Infrastructure?

Policy GE2 Green Space

We consider that the wording of this policy remains valid and do not propose any changes.

QUESTION 75

Do you have any comments on our proposals to retain the above policy with no changes?

Policy GE3 Biodiversity, Geological, landscape and Archaeological Conservation

In terms of biodiversity, the topic paper sets out the changes which have occurred since the adoption of the plan, including the Environment Act 2021, changes to the NPPF and the introduction of Biodiversity Net Gain (to be mandatory at 10% in November 2023).

Whilst changes are still emerging, we think the policy now needs to be brought up to date. We consider that:

- Part 1a should state a need for at least 10% BNG, including householder applications.
- Part 1d should be amended to read preserve species which are legally protected, in decline, are rare or *provide veteran-tree quality wildlife habitat features, such as cavities, holes, significant deadwood, dead bark, rot, fluxes, split limbs, stubs, etc (re EN SSM)*. This may include where appropriate BS5837 Category C trees including dying/dead trees, within Coventry or which are covered by national, regional or local Biodiversity Action Plans.

We propose that Part 2 should identify biodiversity offsetting sites in line with BNG requirements. All areas of priority should be linked to Section 41 (protected) species and habitats and should support the protection of these.

We propose that Part 3 should be expanded to:

- Identify, or reiterate key corridors for enhancement if mentioned in GE1 part 2.
- state the need to create new green spaces to achieve ANGSt standards, and to propose targets for connectivity across the city, following GE1 part 3, to support the Green Space Strategy
- note the important of green features in the built environment, such as additions of green walls/roofs, bee/bird/bat boxes, following GE1 part 5.
- mandate or reiterate increases in tree coverage, wildlife-friendly buildings, and new green spaces if mentioned in GE1 part 5.
- require the continual improvement of blue infrastructure, attempting to achieve good ecological status in all water bodies in key wildlife areas in line with the WFD by a locally agreed date. Any development with negative impacts on water quality should have to contribute Section 106 funding to support these improvements.

QUESTION 76

Do you have any comments on our suggested policy approach to strengthening and updating Policy GE3?

Policy GE4: Tree Protection

Policy GE4 focuses on tree protection and the measures required to mitigate against the impact of trees from development.

We consider that part 1 should be expanded to cover development proposals and general applications including those proposing tree work, with positive consideration being given where:

- there is no unacceptable loss of, or damage to, existing trees or woodlands, including their buffers
- they make a contribution to visual amenity

We propose that the [policy should state that any loss of trees as part of development proposals should be proposed in a tree survey.

We suggest that part 2 should be expanded to state that:

- Certain trees such as Specimen trees, Veteran trees and Ancient Woodland including their buffers, are of such importance and sensitivity as to be major constraints on development or to justify its substantial modification (Re 5837 5.1.1. not paraphrased). Irreplaceable habitats such as those provided by Veteran trees and Ancient Woodlands cannot be replaced or mitigated against (Re PPG 14-1-22 AW).
- Trees that are already subject to protection either as part of an Ancient Woodland (as shown in Appendix 3) or through a Tree Preservation Order or are of TPO quality should be retained for the value they add to the visual amenity of the area, as such development proposals should retain protected trees.
- Development close to ancient woodlands should comprise a buffer of a 30m no-build zone. This zone may include lightweight no-dig construction of suitably designed edge roads within the outer 21-30m. This is to allow for features such as boundary hedge overspill and kerb haunching.

- In exceptional circumstances where the benefits of development are considered to outweigh the benefit of preserving protected trees or trees of TPO quality, development will be permitted subject to adequate compensatory provision being made.
- Tree pits are to be backfilled with peat-free tree planting compost to be incorporated with topsoil from the tree pit in a ratio of 3 parts topsoil to one part tree-planting compost as backfill.

QUESTION 77

Do you have any comments on our review of Policy GE4 Tree protection?

Chapter 9: Design

Preamble - the City's priorities for the green environment and addressing climate change

The Vision and priorities of the One Coventry Plan is to create a city with a strong and resilient economy; where residents get the best possible start in life, experience good health and age well; and where the inequalities are tackled within the city's communities. Also, a city that leads the way and invests in the green industrial revolution; embeds environmentally friendly behaviours and explores opportunities to lessen the pressures caused by climate change. The One Coventry Plan highlights the challenges the city faces regarding the impact of the pandemic, health inequalities and the environment. Chapter 9 of the Local Plan supports the vision and priorities set out with the One Coventry Plan as it recognises that in addition to ensuring good physical design and appearance of new developments, the requirement for high quality design needs to also focus on strengthening approaches to reduce the wider energy impacts of developments; better reflect and address the impacts of an ageing population; reflect the changing requirements and needs of residents following the pandemic such as access to open space and the standard of private amenity space; better address the need to improve health and wellbeing and reduce inequalities; and enhance the biodiversity value of new developments.

The Local Plan recognises there are opportunities within Chapter 9 to strengthen how planning can address the five development pathways in the Coventry Climate Change Strategy. The scope of Chapter 9 means it could be strengthened to ensure developments better address the pathways of lowering emissions; enhancing biodiversity and urban ecosystems; creating more resilience in developments so that they may better respond to the change in climate and extreme weather events as well and have a greater emphasis on way finding and addressing the needs of those who are most vulnerable; and the equitable and people centred pathway to better promote health and wellbeing, allow more residents to better respond to the impacts of climate change themselves and to better respond implement the lessons learnt from the pandemic.

The Climate Change strategy requires the plan review to promote high quality design that promotes active travel (this is also addressed in the Transport chapter). The review of this chapter should be read in conjunction with the Design Topic Paper which provides the context.

Policy DE1: Ensuring High Quality Design

It is considered that existing Local Plan design Policy DE1 still provides a sound basis on which to assess the architecture and design of proposals, however the lessons of the pandemic; the resultant and ongoing economic stresses; the national and local emphasis on improving health and wellbeing and enhancing biodiversity; and the climate change agenda, have highlighted areas where the existing policy could be strengthened to require developments to better address these challenges and contribute to these key priorities.

It is therefore suggested that there should be an ongoing commitment to build a further evidence base to better align the policy with the identified trends listed above, while ensuring the policy stays resolute on requiring developments to incorporate the highest sustainability principles and to promote high quality, varied and innovative architectural approaches that accord with the national design policy direction and which would be coherent with the evolving national building regulations at the later technical design stages.

In accordance with climate change priorities, policy DE1 can play a part in requiring new developments to be resilient and adaptable over their lifetime so that they can best adapt to changing market trends and to ensure better economic sustainability. Part (3) (k) of the policy covers this and is suggested to continue to be supported as currently written. Positive and pro-active principles of adaptability in building design may significantly reduce the wider energy impacts of development proposals and Part (3) (m) is also suggested to continue to be supported as currently written.

It is suggested that Policy DE1 should better address social sustainability principles and better reflect and address the impacts of an increasing aging population. It is suggested that this is achieved by additional points being added to part (3) of the policy requiring all developments to meet the following:

- promote generational community mixing of housing types in developments that include for younger, older and retirement ages; and
- incorporate the outcomes of the Housing our Ageing Population Panel for Innovation (HAPPI) design guidance, which are All Party Parliamentary Group (APPG) publications, where the principles are based on 10 key design criteria. Many are recognisable from good design generally - good light, ventilation, room to move around and good storage - but they have particular relevance to the spectrum of older persons' housing which needs to both offer an attractive alternative to the family home and be able to adapt over time to meet changing needs.

Point 3 (l) of Policy DE1 seeks to promote diversity through a mix of uses within a site, however, it is suggested to introduce an additional point into DE1 that requires all developments to promote a mixture of tenures and accommodation types to support the positive building of neighbourhoods and communities inclusive of tenure blind development, alongside supporting infrastructure – ‘integrated neighbourhood principles’. This would be in addition to the generational mix of housing types described above.

It is suggested that Policy DE1 supports the higher standards for housing set out in the housing policies of the Local Plan by requiring developments to comply with the NDSS internal space standards, considering impacts upon viability to ensure housing stock positively meets the needs of users.

It is suggested to add wording into Policy DE1 (3) (b) to promote ‘responsive architectural innovation’ that encourages developments to advance a new period of the City’s legacy of architectural innovation to reinforce Coventry’s identity as a city for built environment innovation.

Policy DE1 currently doesn’t address high quality design in terms of health and wellbeing and as these are principles of high priority for the Local Plan, it is suggested that additional points are added into (3) seeking for all developments to meet the following:

- provide high quality external amenity space to address the lessons from the Covid pandemic;
- provide public open space catering for the wide range of users and uses whilst encouraging social interaction to deliver positive, distinctive places and locally identifiable space between buildings;
- incorporate the principles of the Building for a Healthy Life toolkit for neighbourhoods, streets, homes and public spaces, a publication written in partnership with Homes England, NHS England and NHS Improvement.

To strengthen the protection of the historical built environment in the policy, it is suggested to include at the end of Part (3) (d), “and for developments in relation to heritage assets and / or in Conservation Areas reference to the Historic England publication ‘Streets for All - Advice for highways and public realm works in historic places’ should be made.”

QUESTION 78

Do you have any comments on the review of Policy DE1 (Encouraging High Quality Design)

Chapter 10: Heritage

Preamble - the City's priorities for heritage and conservation and addressing climate change

While the One Coventry Plan doesn't specifically reference heritage issues, it does, as part of the plan's priority to increase the economic prosperity of the city and region, talk about supporting existing business; working to secure new inward investment in the city; marketing Coventry as an attractive place to invest and create new jobs; and ensure a high standard city centre. Heritage plays a part in achieving these priorities and in promoting the city as an attractive place to live, work and invest in. The Local Plan will continue to support the conservation and enhancement of the city's heritage assets through Chapter 10 and will continue to keep the city's built form under review to identify whether any further heritage assets should be allocated and which could promote the corporate approach of the One Coventry Plan.

The relevant draft climate change strategy pathways that the Local Plan would align its Heritage policies with and that would best promote and enhance Heritage assets in the city would be the nature-based and resilient pathways. These pathways have the potential to enhance the city's heritage assets, while at the same time ensuring heritage assets are more resilient to the impacts of climate change and to improve the greening around them and to promote biodiversity and open space.

Historic Environment context

There is separate statutory primary legislation for the Historic Environment contained within the 'Town and Country Planning (Listed Building and Conservation Areas) Act 1990' which provides specific protection for buildings and areas of special architectural or historic interest.

Section 16 of the NPPF deals with 'conserving and enhancing the historic environment'. Paragraph 190 requires the Local Plan process to set out a positive strategy for the conservation and enjoyment of the historic environment and that this is to be achieved through sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation. Consideration should be taken into the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring, including the positive contribution to local character and distinctiveness.

The core historic environment policies within the local plan are policies HE1, HE2 and HE3, and CC2 of Coventry City Centre Area Action Plan (AAP) – 2011-2031.

Policy HE1: Conservation Areas

Following the formal adoption of conservation areas in Brownhill Green and Earlsdon, it is suggested to update Policy HE1 in terms of including these two areas in the list of conservation areas in point (1) and removing point (2) which lists proposed areas designated for conservation areas, of which there currently are none.

The Council is not currently in the process of proposing any further conservation area designations, however, it is suggested that a new point (2) should be included stating that areas of the city considered to have special architectural or historic interest or where the character and appearance of an area are of a desirable status to

conserve or enhance will be continually review over the plan period to identify whether further areas of the city would warrant conservation area designation.

The approach would need to comply with paragraph 191 of the NPPF which states that when considering the designation of conservation areas, *“local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.”*

A current review of the boundaries of the following Conservation Areas is currently underway with further work needed to be carried out to establish whether suggestions for change will be taken forward by cabinet:

- Allesley;
- Kenilworth Road;
- Stoke Green;
- Greyfriars Green;
- Ivy Farm Lane
- High Street; and
- Spon End.

However, given that section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to review their Conservation Areas from time to time and designate extra areas where appropriate, it is considered appropriate that all conservation areas in the city should be reviewed to confirm their designation and boundaries are still appropriate.

QUESTION 79

Do you have any comments on the review of Policy DE1 (Encouraging High Quality Design)

Policy HE2: Conservation and Heritage Assets

It is considered that Policy HE2 still serves its purpose and complies with national policy and guidance and the only update proposed is to include a new point that states “for developments in relation to heritage assets and / or in conservation areas reference to the Historic England publication ‘Streets for All - Advice for highways and public realm works in historic places’ should be made.” We also consider that other Historic England Good Practice guidance should be referenced.

QUESTION 80

Do you have any comments on our review of Policy HE2, Conservation and Heritage Assets?

Policy HE3 Heritage Park – Charterhouse

The aims for the heritage park at Charterhouse and the expansion of the school facilities at bluecoat school are still supported by the Council and are underway. Therefore, this policy is not suggested to require significant changes other than to update the wording with the latest position of the development of the heritage park and emphasising the Council’s continued support for it.

QUESTION 81

Do you have any comments on the review of Policy HE3 (Heritage Park – Charterhouse)

Policy HE4 Archaeology

Policy HE2 includes reference for all proposals to conserve archaeological remains of all periods from the earliest prehistoric human habitation to the modern industrial period, however, it is suggested that a separate archaeology policy that more clearly sets out the different archaeological interests that warrant protection and how developments should respond to their significance would be beneficial. This approach would capture Council priorities in one place and consolidate guidance that is spread across different documents. Also, a specific policy could clarify elements of the historic environment, such as the city walls, where some parts are Scheduled whilst other parts are not, but may be of equivalent significance and subject to the same policies under NPPF footnote 68 which states “Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets”. A specific policy would also allow the alert mechanism for both planners and consultants on the spatial planner, Archaeological Constraint Areas to be mentioned in the Local Plan and for archaeological evaluation to determine archaeological significance of a site to be determined in the early stages of the process.

The inclusion of ‘assets of archaeological interest’ alongside heritage assets in current policy would go some way to resolve the issue but this is considered to be only a minor fix. A new specific policy would reference what the different archaeological significances are that developments would need to consider and the approach that should be taken for sites within an Archaeological Constraint Area. It could also clarify when desk based or full assessments would be required and include priorities for development proposals that affect archaeological features and deposits and set out that developments will be supported where they are designed to enhance or to better reveal the significance of the asset and will help secure a sustainable future for it. I could also set out that harm to non-designated archaeological remains will be resisted unless convincing justification through public benefit can be demonstrated or mitigation proposed to outweigh that harm.

The new policy will also require developments and archaeological assessments to reference and to take into account the Chartered Institute for Archaeologists (CIfA) standards and guidance and Historic England publications, including the Historic England publication - Coventry City Centre Historic Area Assessment (Hanson *et al* 2020), which provides an improved evidence base for historic assets in the city.

It is also suggested that updating or upgrading the background material for archaeological works is required. This should be in the form of a policy statement, outlining the general requirements and best-practice, working in accordance with Chartered Institute for Archaeologists standards and guidance and the production of generic Briefs covering the main aspects of archaeological work – desk-based research, intrusive archaeological fieldwork, non-intrusive survey and post-excavation assessment and archiving. The Chartered Institute for Archaeologist recommends that these are produced and although it is not feasible to have a bespoke one for each and every piece of archaeological works, generic Briefs would allow applicants greater certainty on what is required for applications and should raise the quality of archaeological work undertaken in Coventry (including academic and community works). These documents would be part of the wider guidance for the historic environment, similar to that already produced for Heritage Statements - <https://www.coventry.gov.uk/heritage-ecology-trees/conservation-areas/6>.

QUESTION 82

Do you have any comments on whether a separate archaeological policy would be beneficial (Policy HE4)

Chapter 11: Accessibility

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

The One Coventry Plan's three priorities are to increase the economic prosperity of the city and region; improve outcomes and tackle inequalities within the city's communities; and tackle the causes and consequences of climate change. Chapter 11 of the Local Plan would align and address with these corporate priorities as it seeks to build a strong inclusive economy that reduces transport inequality and makes Coventry a more accessible city for all. The promotion of all forms of public transport to all parts of the city and the delivery of improvements to walking and cycling routes would contribute to the corporate aim of ensuring that residents have access to opportunities no matter where they live.

The approach of the Local Plan in Chapter 11 ensures that the low emissions pathway in the draft Coventry Climate Change Strategy would be addressed which supports the modal shift in transport away from fossil fuels and the further development of new forms of public transport that creates networks for active travel and improving access to facilities by better design. It would also address the resilient pathway in aiding the city to better respond to climate change and extreme weather events.

Furthermore the Climate Change strategy requires the plan review to:

- Promote high quality design that promotes active travel
- Ensure accessibility to public transport and minimise the need for the private motor vehicle

The Council's Coventry Transport Strategy sets out plans to significantly reduce current levels of car travel, including by substantially improving the city's public transport network and by creating a more suitable environment for walking and cycling. The strategy embraces new forms of transport (such as drones and micro-mobility) to reduce the reliance on vehicles for home deliveries and it is accelerating the transition to zero emission vehicles. The strategy also includes improvements to the road network, advocates average speed camera areas and promotes car clubs / car shares and the switch to electric vehicles. The West Midlands Combined Authority (WMCA) is producing a Local Transport Plan (LTP) covering Coventry, which is expected to be published during 2023. This will be supported by the Coventry Transport Strategy

The proposed changes to the local plan set out below are intended to ensure the strategies in the transport strategy can be met. We review each policy in the order it appears in the current adopted Local Plan to avoid confusions but potentially these might be re-ordered in a final version to reflect changed priorities to reflect the Transport Strategy and the need to address climate change.

The transport topic paper provides further context to the review of the transport policies.

Policy AC1: Accessible Transport Network

A Green Paper published in June 2021 makes clear that the refreshed LTP will focus on addressing five 'motivations for change'. These are:

- Tackling the climate emergency
- Reducing transport inequality
- Reducing physical inactivity

- Enhancing local communities & places
- Building a strong inclusive economy

The Green Paper also makes clear that achieving these goals will require a significant change in travel behaviour, as current levels of car travel are not sustainable. This is also reinforced by WMCA’s Climate Change Strategy, #WM2041, which sets a target for the region to achieve net zero status by 2041 (nine years earlier than the current national target).

We think that Policy AC1 needs updating in regard to latest guidance and the changes to mainstream and emerging modes of transport as set out below.

We suggest the policy needs to include a reference to the forthcoming Transport Design Guide which will set out the standards that new transport infrastructure (e.g. highways, cycleways, pavements) will be expected to meet. While the Design Guide is currently still in development, it is anticipated that this work will be completed by the time the revised Local Plan is adopted.

Electric vehicles and bicycle hire, which are both referenced as emerging forms of transport, are arguably now mainstream. We therefore suggest these be incorporated into policies AC2 and AC4 respectively, where more detail could be included on the specific expectations for how developers should support these modes.

We recommend that other emerging modes of transport, such as Very Light Rail, Demand Responsive Transport, micro-mobility, Connected Autonomous Vehicles (driverless cars) and drones be referenced in policy AC1 (d).

QUESTION 83

Do you have any comments on the review of Policy AC1 (Accessible Transport Network)

Policy AC2: Road Network

The Government has produced the strategy document – *Taking Charge: The Electric Vehicle Infrastructure Strategy* – which sets out plans to remove access to charging infrastructure as a barrier to the take up of electric vehicles. The strategy envisages that by 2030 recharging will be more convenient than refuelling at a petrol station and that there will be at least 300,000 public charge points in the UK.

The NPPF supports this by pushing councils to enable plug-in and other ultra-low emission vehicles to be charged in safe, accessible and convenient locations. Government statistics show that, while the number of electric vehicles in Coventry is increasing rapidly, they remain a small minority of the total. At the end of 2022 there were approximately 2,800 battery electric vehicles and plug-in hybrid vehicles registered to addresses in the city.

With climate change being a fundamental issue underpinning all policies of the Local Plan review, we suggest policy AC2 is updated with a new separate paragraph on the ways in which developers will be expected to support the provision of electric vehicle charging points along the road network.

Currently, policy AC2 (2) sets out how the Council can secure contributions and the provision of transport infrastructure, such as through S106 agreements, however given the pressing need for increasing electric vehicle infrastructure provision in the city, a separate paragraph on how developers could support this is suggested.

It is also recommended to remove specific reference to the Community Infrastructure Levy in Policy AC2 (2) given the Council’s viability exercise has determined that CIL will not be introduced into the city in the foreseeable future. It is proposed that a more generic reference to ‘developer contributions’ may be appropriate given that

the Government has stated its intention to introduce a new 'Infrastructure Levy', further details on this are awaited at the time of writing.

QUESTION 84

Do you have any comments on a mechanism to support the provision of Electric Vehicle Charging Points (EVCP)?

Policy AC3: Demand Management

Evidence suggests that Coventry is currently a city that is largely dominated by car travel with both the total number of cars owned by Coventry residents and the number of cars per household having been increasing steadily over the long-term. Congestion is still common on the parts of the city's road network, while the high volume of car trips also contributes heavily to the city's carbon footprint, creates air pollution and leads to around 600-700 casualties from road traffic accidents every year.

To promote the Council's climate change priorities the parking standards referred to in policy AC3 will be reviewed. It is recommended that the new standards reflect the Council's desire to reduce overall levels of car travel and to promote more sustainable alternatives, such as walking, cycling and public transport, while also recognising that some level of car travel is unavoidable and must still be catered for.

To better reflect the many factors that influence the level of car parking in the city, it is suggested a more nuanced approach is required. Currently the Local Plan only draws a distinction in the level of parking provision that needs to be provided between development that is proposed in the city centre (i.e. within the Ring Road) and elsewhere. However, in practice there are many factors which influence the level of car parking which will be required in a specific development, including the demographic and economic status of residents and the ease with which alternative modes of transport can be accessed.

To reflect the requirement of developments to encourage and incentivise sustainable travel, it is suggested that an additional paragraph be added to the policy in relation to the provision contribution of Mobility Credits (vouchers which residents can use to pay for various forms of sustainable travel) and ways in which developers may be required to support this approach.

QUESTION 85

Do you have any comments on whether parking standards should reflect the strategy to reduce overall levels of car travel and promote more sustainable alternatives?

QUESTION 86

Do you have any comments on whether parking levels should take into account a range of factors such as the nature of the accommodation, availability of public transport, ease of walking and cycling in the local area etc?

QUESTION 87

Do you have any comments on the mechanism of mobility credits to be secured as part of planning permissions to provide active and sustainable modes of travel and their inclusion in policy AC3?

Policy AC4: Walking and Cycling

The Council's Coventry Transport Strategy sets out plans to significantly reduce current levels of car travel, including by substantially improving the city's public transport network and by creating a more suitable environment for walking and cycling.

The Government has produced the strategy document – *Gear Change: A Bold Vision for Walking and Cycling* – which is focused on bringing about a long-term shift towards active travel. Gear Change includes a specific commitment to ensure that by 2030 half of all journeys in towns and cities will be made by walking and cycling.

This is backed up by the NPPF, which encourages Councils to give priority to pedestrian and cycle movements and provide for attractive and well-designed walking and cycling networks.

Although Coventry is a relatively compact city, the number of people walking and cycling for local journeys is not as high as it could be. While data from the Council's household survey suggests that many residents walk when escorting children to school (42 per cent) or travelling to their own place of education (31 per cent), in 2021 only 9 per cent of commuters travelled to work on foot.

Levels of cycling are particularly low, accounting for only around 1 per cent of journeys into the centre of Coventry and between 1 and 4 per cent of residents' journeys when they are commuting, escorting children to school or traveling to their own place of education. A lack of convenient and safe routes for cyclists is recognised as a barrier to higher levels of uptake. In 2021 only 52 per cent of residents agreed that it was easy to travel around Coventry by bike. This is significantly fewer than the number who felt it was easy to walk, drive and travel on public transport.

The Coventry Transport Strategy is committed to improving this by developing safer and more pleasant routes and environments for both pedestrians and cyclist, by promoting new liveable neighbourhoods, and by further expanding the WM cycle hire scheme. There may also be potential to further expand E-scooter hire, if these are legalised by the national Government.

Given the work needed to better encourage walking and cycling it is suggested that the wording in every part of Policy AC4 is strengthened and better reflect the higher priority which the Council is now placing on promoting walking and cycling (as reflected in the Coventry Transport Strategy and the emerging Climate Change Strategy).

It is also suggested that in the final document the policy be moved higher up the list of the Accessible policies to reflect its importance.

Policy AC4 (2) is recommended to be updated in relation to Quiet Streets to reflect the Council's plans to deliver a wider range of walking and cycling schemes, including high quality, segregated cycleways on key corridors, Liveable Neighbourhoods and School Streets. At present this policy section doesn't set specific requirements, only that measures to control and restrict certain traffic movements and vehicle speeds to create an environment where walking and cycling are the preferred modes of transport, is to be developed.

It is suggested that reference be made in the policy to the Local Cycling and Walking Infrastructure Plan (LCWIP) (currently in development) and set out the Council's expectations for how developers may be required to support schemes contained within it, as well as creating an environment which encourages walking and cycling when designing their schemes.

It is suggested that Policy AC4 (4) be updated to make specific references to the ways in which developers will be expected to support the provision of both cycle parking facilities and cycle hire.

QUESTION 88

Do you agree that strengthening the wording to promote cycling and walking more is the right approach? Please provide comments

Policy AC5: Bus and Rapid Transit

The Government has produced the strategy document – *Bus Back Better* – a new National Bus Strategy aimed at reversing a long-term decline in levels of bus patronage (outside of London). It includes plans to make services more frequent and more reliable, to better integrate services that are operated by different bus companies and to accelerate the rollout of electric buses

The NPPF requires Councils to facilitate access to high quality public transport and to focus significant development in areas where people can travel sustainably.

The city has an extensive bus network, however, there are challenges with the reliability of the services because of an industry wide shortage of drivers, and challenges with the radial nature of the city's bus network, which means many passengers need to travel into the city centre to change buses leading to longer journey times that make bus services uncompetitive compared to travelling by car. Disabled passengers, particularly wheelchair users, have raised concerns about difficulties in accessing services. Passenger numbers have not fully recovered since the pandemic and are typically around 10 – 20 per cent lower than pre-pandemic levels during 2022.

TfWM have recently produced a *Bus Service Improvement Plan*, which sets out plans to improve bus services across the region over the next 5 years, including by transitioning to electric buses, freezing fares and improving ticketing and passenger information.

The Council's Coventry Transport Strategy also sets out plans to significantly reduce current levels of car travel, including by substantially improving the city's public transport network and by embracing new forms of transport (such as drones and micro-mobility) and accelerating the transition to zero emission vehicles. There is a commitment to improve the experience for disabled passengers and passengers with prams and for the first all-electric bus fleet in the country, by 2025, while a city wide 'On Demand' bus service has recently been introduced.

While the Council recognises that improvements to bus services are needed, in terms of the role Policy AC5 can play it is suggested that Policy AC5 (2) - the development of a rapid transit network - be updated to reflect the latest plans for the Very Light Rail system, as this has been established as the Council's preferred way of deliver improvements.

It is also recommended that in the final document the policy be moved higher up the list of the Accessible policies to reflect its higher priority.

QUESTION 89

Do you have any comments on the review of Policy AC5 (Bus and Rapid Transit)?

Policy AC6: Rail

The West Midlands Rail Executive (WMRE) has produced the *Rail Investment Strategy*, which they are currently consulting on and which sets out their priorities for investment in the rail network over the next 30 years.

While the city has good rail links to London and Birmingham and pre-pandemic passenger numbers were increasing steadily across the city's four train stations, local services to Leamington, Kenilworth and Nuneaton currently only run once per hour, while the city has no direct rail links to the East Midlands at all. The Council's Transport Strategy seeks to improve this by seeking to deliver more frequent and direct rail services to Warwickshire and the East Midlands and to explore the potential for additional railway stations.

In addition, passenger numbers have not fully recovered since the pandemic and are typically around 10 – 20 per cent lower than pre-pandemic levels during 2022.

Policy AC6 is still relevant in seeking to achieve the aims listed above and those contained in the Coventry Transport Strategy and doesn't need any updates, but it is recommended to move it higher up the list of the Accessibility policies in the final document to reflect the higher priority which the Council is now placing on promoting public transport.

QUESTION 90

Do you have any comments on the review of Policy AC6 (Rail)?

Policy AC7: Freight

The Government has produced the strategy document – *Future of Freight: A Long-Term Plan* – a further strategy which includes plans to decarbonise the freight industry.

It is suggested that Policy AC7 be updated to strengthen this Government strategy.

It is suggested Policy AC7 (1) be updated to include the requirement for developments with 24-hour operations to provide overnight parking and facilities (such as toilets and showers), to reduce the number of HGVs having to park overnight on roadsides.

It is also suggested that Policy AC7 to include a new paragraph requiring new developments to demonstrate that they can function without requiring HGVs to travel on smaller, residential roads, making specific reference to the Council's forthcoming Future Highway Network Plan, which while currently still in development, is anticipated that it will be completed by the time the revised Local Plan is adopted.

Another new paragraph is recommended to be included which encourages the development of Freight Consolidation Centres, in appropriate edge of city locations close to the strategic road network, to reduce volumes of HGV/LGV traffic within the city. The policy should therefore support these where appropriate.

QUESTION 91

Do you have any comments on the review of Policy AC7 (Freight)?

Chapter 12: Environmental Management, Minerals and Waste

Preamble - the City's priorities for sustainable environmental management and addressing climate change

The One Coventry Plan sets out an approach for a relentless focus on tackling the causes of climate change and mitigating the inevitable consequences of this. Chapter 12 of the Local Plan would align with this corporate approach focusing on planning for climate change and renewable energy generation along with lowering of CO₂ emissions and improving housing standards through the strengthening of the Building Regulation policy by requiring an ambitious planning response to the challenges of climate change requirements. The One Coventry Plan recognises that air pollution is a significant problem in Coventry and contributes to poor health, that disproportionately affects the poorest and most vulnerable in the city, further increasing the inequalities in communities. Reducing these inequalities is a priority of the One Coventry Plan. Chapter 12 identifies the city area as an Air Quality Management Area (AQMA) and retains the focus on reducing air quality as well as reducing pollution and the effects of land contamination when developing previously developed land.

Chapter 12 would align with the development pathways in the draft Climate Change Strategy. The Low emissions pathway promotes the generation of power using renewable energy for new developments and existing properties through retrofitting and for transportation with an increase in electrification of both public and private modes of transport. The circular economy pathway seeks to maximise the participation rates in recycling activities from the public and businesses across the City, which would be relevant to the climate change and waste management policies in Chapter 12. The Resilient pathway in the draft climate change strategy is concerned with the city's preparedness for incidents like flooding and other extreme weather events with a focus on sustainable urban drainage systems and planting of vegetation in built up areas to help cool the city and improve air quality, which the policies in Chapter 12 would align with.

The draft Climate Change Strategy requires the Local Plan review to:

- Further promote energy conservation in buildings and the development and use of renewables for energy generation
- Further reduce the risk of flooding and minimise the opportunities for heat gain'

Policy EM1 Planning for Climate Change

We consider that this policy needs updating in terms of bringing it up to date with the approach and direction set out in the COP15 and COP26, NPPF (2021) and, locally, the Councils recently published draft Climate Change Strategy (2023), in order to raise overall standards and work towards achieving net zero in all new homes, with a focus on existing buildings using the fabric first approach. The update will also introduce additional approaches as set out in the accompanying Climate Change and Sustainability topic paper and will introduce specific targets, where appropriate.

These will also include targets as recommended in the Green Infrastructure and biodiversity topic paper such as mandating levels of canopy cover on major developments and outlining targets for city wide canopy cover which could be based on targets as set out in the existing Open Space SPD.

We think this policy should also proactively promote the benefits of urban living, including high density developments and co living proposals to help in grey water systems with high quality design and the use of advanced methods of construction (including modular build) encouraging more people to choose a lifestyle which helps to address the challenges of climate change.

QUESTION 92

Do you have any comments on the proposed policy direction that Policy EM1 needs updating with the introduction of specific targets for mitigating and addressing the challenges of climate change and working towards achieving net zero in all new build developments?

For non-domestic developments, retrofit, refurbishment and change of use schemes there is scope to achieve net zero for such proposals. The Council will be developing an Adaptation and Resilience Plan for the city but we believe the WMCA Climate Change Adaptation Plan⁶ should be considered to address this issue, including SuDS, reducing overheating risk by utilising green roofs/walls and natural shading and to reduce flood risk, alongside adopting renewable technologies to reduce reliance on grid electricity. The Council will also be seeking to encourage and support the development of net zero neighbourhoods and more liveable neighbourhoods designed in response to tackling the causes and consequences of climate change which could include community heat networks, provision for battery storage fed by renewable energy sources, infrastructure to support active travel modes and EV charging and green space, SuDS and trees to provide biodiversity, drainage and shade, alongside opportunities for community food growing.

QUESTION 93

Do you have any comments on the above proposals?

Policy EM2 Building Standards

We consider this policy needs to be deleted and replaced with a new approach to building standards. It is considered that this policy adds little value in its current form in the Coventry context as to how new build developments can be sustainably built in accordance with the approaches set out in the NPPF, Coventry draft Climate Change Strategy and recent updates to national Building Regulations.

A bespoke new policy approach is therefore considered necessary to provide an ambitious planning response to the challenges of climate change and work towards helping achieve international, national and local targets through more challenging building standards.

Based on the recommendations in the Green Infrastructure and biodiversity topic paper, it is suggested the policy could also include mandating the introduction of green walls/roofs, bird, bee and/or bat boxes within new build

⁶ <https://www.sustainabilitywestmidlands.org.uk/resources/west-midlands-climate-change-adaptation-plan-2021-2026/>

developments comprising a suite of green features based on different scales of development. The use of SPD could also be required in this regard.

The new building regulations aim to achieve zero CO2 emissions by 2050. They include lowering the maximum CO2 emissions by buildings and raising the bar for current overheating, fabric, and ventilation regulations. The new building regulations are introduced to bring the U.K.'s carbon emissions down to zero by 2050 which will take effect in 2025. The updated rules are a bridge until the Governments Future Homes Standard is implemented, which will bring about stricter adjustments to make buildings more energy efficient.

The National Building Regulations came into effect in June 2022. However, a one-year grace period currently exists. Thus, if projects received Building Regulations permission before June 15, 2022, the old requirements continue to apply. However, developers had until June 15, 2023 to start the work before the approval expired. All newly constructed residences must reduce carbon emissions by at least 31% starting on June 15, 2022. All new non-residential structures must cut carbon emissions by at least 27%.

However, the building regulations will change in 2025 when the Future Homes Standard is implemented which will require all new homes to comply with a stricter standard. Among the requirements, there will be a stipulation that new homes must be "zero carbon ready". CO2 emissions will be 75-80% lower than those built to current standards.

QUESTION 94

Do you have any comments our suggested policy proposals in that Policy EM2 needs to be deleted and replaced with an up-to-date new policy?

QUESTION 95

Do you have any comments on our proposals for setting more ambitious standards for new build developments with the introduction of specific targets that go beyond existing Building Regulations as described above? Please provide detail including what such targets might be, and any evidence to show how these would be viable and deliverable.

Policy EM3 Renewable Energy Generation

In order to support the transition to net zero carbon there will need to be an increase in renewable energy generation and associated infrastructure across the city. Paragraph 152 of the NPPF notes that the planning system should support renewable and low carbon energy and associated infrastructure. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- Provide a positive strategy for energy from these sources that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily.
- Consider identifying areas suitable for renewable and low carbon energy sources and supporting infrastructure.
- Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

Support for community-led initiatives for renewable and low carbon energy should also supported, giving consideration to the role of neighbourhood planning as well as local plans. Footnote 54 of the NPPF notes that in the case of proposed wind energy development involving one or more turbines, these should not be considered acceptable unless they are located in an area identified as suitable for wind energy development in the development plan.

In addition, such applications also need to demonstrate that following consultation, the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing. Further detailed guidance on developing policies on renewables and low carbon energy and the planning considerations involved in such schemes is provided in the Planning Practice Guidance (PPG). We consider that this policy needs updating in terms of bringing it up to date with the approach and direction set out in the NPPF (2021) and, locally, the Councils recently published draft Climate Change Strategy (2023), in order to raise overall standards in the renewable energy sector.

In particular, we believe there may be scope to include some level of mandatory inclusion of renewables in this policy including roof top solar or small scale ground mount such as carports. In addition, we believe decentralised energy networks are critical in this respect when looking at renewable energy and so development proposals of new additional utility networks and enhancements to existing utility networks to enable zero carbon, resource efficient, resilient and adaptable buildings and transport, with appropriate energy supply capacity for expected future demands (both current and new need), will be encouraged across the city. This is required to support achievement of net zero objectives, improve climate resilience, optimise heating/cooling to ensure the delivery of cost effective and sustainable developments.

QUESTION 96

Do you have any comments on our suggestions for updating Policy EM3?

Policy EM4 Flood Risk Management

We consider this policy needs a minor technical update in terms of bringing it up to date with the approach and direction set out in the NPPF (2021) and the Councils Local Flood Risk Management Strategy and draft Climate Change Strategy to ensure future levels of flood risk are accounted for. Therefore, specific reference in the policy to acknowledge that current and future impacts of climate change be taken into account and that flood zone 2 be added in part 2 of the policy in addition to flood zone 3. A specific technical update regarding point 2(e) is required to set a minimum threshold figure to account for the 1 in 100 year forecast.

In respect of point 6, it is suggested the exception test be updated to accord with the NPPF.

As per the recommendations set out in the Green Infrastructure and biodiversity topic paper, this could also include strengthening the policy further by including a specific reference to the continual improvement of blue infrastructure as there is a need to achieve good ecological status in all water bodies in key wildlife areas in line with the Water Environment Regulations. Any development with potential negative impacts on water quality could be explored through the legal agreement mechanism and contribute to Section 106 funding to support these improvements.

Expanding on policy using SPD is essential to ensure that there is sufficient breadth and detail to Coventry's overall flood risk management policy. To support and increase the effectiveness of the expansion of wildlife friendly buildings and biodiversity features, a list of preferred biodiversity features in reference to scales of development, and a list of appropriate trees, shrubs for developments to follow, with benefits for pollinators, air pollution, and hay fever, could be explored through new SPD.

QUESTION 97

Do you have any comments on our suggestions that Policy EM4 needs updating as described above with further technical amendments to help strengthen the policy further?

Policy EM5 Sustainable Drainage Systems (SuDS)

We consider this policy needs a minor technical update in terms of bringing it up to date with the approach and direction set out in the NPPF (2021) and the latest research and guidance published for successful SuDS. In this regard, we suggest point 2 be updated with specific reference to green roof technology and that reference to SPD in point 5 be removed to allow greater flexibility as to how such guidance be developed.

QUESTION 98

Do you have any comments on our suggestion that Policy EM5 needs updating as described above with further technical amendments to help strengthen the policy further?

Policy EM6 Redevelopment of Previously Developed Land

We consider this policy needs a minor technical update in terms of specific reference Water Environment Regulations which will replace the reference to the Water Framework Directive in part 2.

QUESTION 99

Do you agree with our proposal that Policy EM6 needs updating as described above with further technical amendments to help strengthen the policy further?

Policy EM7 Air Quality

Coventry City Council designated the City area as an air quality management area (AQMA) from 1st November 2009 due to elevated, yearly levels of nitrogen dioxide (NO₂). This position has not changed and the policy is considered to be relevant and fit for purpose. Air quality is a material consideration that planners are required to take into account when making their plans and when taking planning decisions. This position is facilitated further by the relatively recent adoption of the Air Quality SPD which sets out how this policy is to be applied and used.

A minor update to the policy is proposed to include a specific reference to the Ministerial Direction for nitrogen dioxide alongside the AQMA to give the policy more weight and bring it up-to-date. In addition, the references to the LETCP are proposed to be removed and replaced with reference to the Air Quality SPD (2019).

QUESTION 100

Do you agree with our suggestion that Policy EM7 needs updating as described above?

Policy EM8 Waste Management

There are no further plans from a waste management perspective to bring forward any sites for the dedicated management of waste in the city. The Mixed Recycling Facility is being developed with an expected completion in

summer 2023. The policy is considered to be relevant and fit for purpose. The Councils wider Waste Strategy is still valid, however, officers are of the view not to review and update this until later in 2023 as the Council need to ensure the Governments wider waste strategy be clarified further before a local review is undertaken.

QUESTION 101

Do you agree with our view that Policy EM8 remains up to date?

Policy EM9 Safeguarding Mineral Resources

The continued supply of aggregates and other material, including recycled and secondary materials is required to meet current and future needs of the development and construction industry. Promoting the use of recycled and secondary materials will help to minimise both primary extraction and waste and so is reflected in Policy EM8.

The National Planning Policy Framework requires local planning authorities to define Mineral Safeguarding Areas (or MSAs for short) in Local Plans 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.

MSAs are required to identify what are considered to be economic deposits of mineral. The purpose of MSAs is to ensure that mineral resources are adequately taken into account in all spatial planning decisions. They do not automatically preclude other forms of development taking place, but highlight the presence of economic minerals so that it is considered, and not unknowingly or needlessly sterilised.

In areas where extraction is permitted or is planned, Mineral Consultation Areas will be designated. None are proposed for Coventry during this plan period as there are no anticipated active mineral sites that are being brought forward during the plan period. This has been evidenced through the British Geological Society's Mineral Safeguarding Project, which has been undertaken for the Coventry, Solihull and Warwickshire authorities.

The policy is considered to be relevant and fit for purpose as it accords with the approach set out in the NPPF (2021) and the associated planning practice guidance (minerals).

QUESTION 102

Do you agree with our view that Policy EM9 remains up to date?

Policy EM10 Non Mineral Development I Mineral Safeguarding Areas

The policy aims to take a balanced approach to protecting minerals resources in Coventry against the need to attract investment and urban regeneration to a primarily built up area.

This policy ensures that all proposals for non-mineral working within the designated MSAs are properly considered and evaluated in partnership with the Coal Authority. The policy also aims to ensure that development proposals within the plan are deliverable without complete sterilisation due primarily to the extensive deep cast coal reserves to the West and North West of the city.

The policy is considered to be relevant and fit for purpose as it accords with the approach set out in the NPPF (2021) and the associated planning practice guidance (minerals).

QUESTION 103

Do you agree with our view that Policy EM10 remains up to date?

Chapter 13 Connectivity

Preamble - the City's priorities for connectivity, infrastructure and addressing climate change

The priorities of the One Coventry Plan include increasing the economic prosperity of the city and region and improving outcomes and tackling inequalities within communities. The One Coventry Plan seeks to create a city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created. Chapter 13 of the Local Plan supports this corporate approach through the support of internet and telecommunications infrastructure. By ensuring good connectivity of broadband and telecommunications infrastructure, Chapter 13 also supports the Council's corporate approach to reduce inequality and access to opportunities around the city.

The draft climate change strategy aims to lower emissions and make the city more resilient to the affects of climate change and extreme weather events. By promoting improvements to internet and telecommunications infrastructure, Chapter 13 of the Local Plan would support the corporate approach to climate change through improved connectivity.

Context: Internet, Telecommunications and Infrastructure

The NPPF recognises the role of advanced, high quality communications infrastructure in creating sustainable economic growth. The development of high speed broadband technology and other communications networks will also play a vital role in enhancing the provision of local community facilities and services.

Communication infrastructure includes telephone systems (both wired and mobile) and broadband. The benefits of having a modern and accessible system of telecommunications, wireless and electronic methods of communication across Coventry and its surrounding area will be significant both in terms of economic growth, inward investment and sustainable living environments. As such, the city aspires to be a superfast broadband city and wherever possible will look to invest directly in projects to help deliver this aspiration. This is also recognised within the Council's IDP and forms the basis for policy C1.

Policy C1: Broadband and Mobile Internet

We think this policy remains relevant and provides a sufficient basis for the continued provision of suitable broadband and mobile internet provision within Coventry. However, we also consider that it duplicates national policy. Therefore, we consider that the policy may not be needed and could be deleted.

QUESTION 104

Do you have any comments on our assessment of Policy C1 Broadband and Mobile Internet?

Policy C2: Telecommunications

We think this policy remains relevant and provides a sufficient basis for the continued provision of suitable telecommunications and mobile internet provision within Coventry. However, we also consider the policy duplicates national policy. Therefore, we consider the policy may not be needed and could be deleted.

QUESTION 105

Do you have any comments on our assessment of Policy C12 Telecommunications?

Policy IM1: Developer Contributions for Infrastructure

The Local Plan has been developed alongside continued consultation with the bodies responsible for infrastructure delivery in order to ensure that required infrastructure will be delivered in a timely manner where appropriate. The views of these bodies have been used in testing and underpinning the strategy, although there remain some areas, which will require on-going consultation with the responsible bodies and agencies to identify future, unforeseen needs. This reflects the on-going importance of continuous engagement and monitoring to ensure the Plan is kept up to date and fit for purpose.

We think this policy remains relevant and up to date apart from part four of this policy. Community Infrastructure Levy (CIL) is not used in Coventry and due to proposed national changes in infrastructure charging regimes, we consider that this reference can now be removed from the policy. We feel it is better just to refer to 'developer contributions' in order to be more resilient to any future change by Government.

QUESTION 106

Do you have any comments on our proposals for a minor amendment to policy IM1? Do you have any other comments on our review of this policy?

Infrastructure Delivery Plan (IDP)

The adopted Local Plan was supported by an Infrastructure Delivery Plan (IDP) and we will update this to support revised policies as the plan progresses. We include an updated IDP at Appendix 3 which reflects the current situation.

QUESTION 107

Do you have any comments on the updated Infrastructure Delivery Plan at Appendix 3?

Chapter 14: Coventry City Area Action Plan Context

The City Council adopted an Area Action Plan (AAP) to help guide, inform and consider development proposals within Coventry City Centre. The Area Action Plan sits alongside the Council's Local Plan 2017 but provides greater detail and builds upon the policy basis provided in that document. It guides how the city centre will develop over the next 15-20 years and sets out a number of strategic principles. The document also identifies key areas of regeneration, important heritage assets that must be preserved and areas of opportunity for a range of uses. These include employment, housing, culture, tourism and leisure. As such, the AAP is intended to provide a framework for the transformation of the city centre, whilst ensuring the appropriate level of new residential, office and retail floor space is delivered.

The latest One Coventry Plan seeks to build on the strength of the City's economy to deliver inclusive growth and work with and support existing businesses to innovate, grow and scale up. The One Coventry Plan is also committed to the city centre and ensuring this is of a high standard offering a diverse range of experiences for residents and visitors with the aim of creating a vibrant city centre with increasing visitor numbers.

The proposed approach of the Local Plan review is to still have focused policy on the development and promotion of the city centre, retaining the current allocations and continuing to promote the vitality and viability of the city centre by supporting development opportunities within it to ensure it would align with the council's corporate aims.

The Local Plan Review supports for the ongoing development of the city centre also takes account of all pathways in the draft Climate Change Strategy as the city centre continues to diversify, evolve and adapt to the change in retail patterns and change in focus for the city centre. The low emissions and circular economy pathways would be supported as these pathways emphasis the need to reduce the carbon footprint of both the city's buildings and transport network and provide the opportunities to deliver new economic opportunities. The resilient pathway which seeks to reduce the risks of climate change and extreme weather events such as flooding, heatwaves and droughts will allow the city centre to function more sustainably and more self-sufficiently having a positive impact on businesses and people visiting the city centre. The Plan Review will also support the nature based and equitable and people centred pathways as the Local Plan seeks to improve the conservation management of and increase access to open green space and biodiversity and habitat creation within urban areas, with the draft climate change strategy placing a greater emphasis for the delivery of these initiatives on the city centre.

The redevelopment of Coventry's city centre seeks to enhance the vitality and viability of the city as a whole and flagship developments such as Friargate and City Centre South aim to act as a catalyst for further high-quality development. Such schemes will help build upon the city centre's strengths.

The future of the AAP

Given the changing nature of the city centre and changes in the wider structure of the economy and society across the region and country, and the increasing need to be adaptable, resilient and responsive to rapidly changing circumstances we are seeking views on the role of the AAP.

We are considering options for the best ways of planning for the city centre including whether the AAP remains fit for purpose or whether other mechanisms might be more appropriate, for example masterplans.

QUESTION 108

What are your views on the most effective mechanisms for the future planning of Coventry City Centre? Please provide supporting evidence where relevant.

Appendices

Appendix 1) Call for sites proforma

Appendix 2) Nationally Described Space Standards

Appendix 3) Infrastructure Delivery Plan update

Appendix 4) Glossary

Appendix 1

Call for Sites Assessment Form

1. Your Confidentially Held Details				
Title		Name		
Organisation (if relevant)			Representing	
Address				
Postcode		Telephone		
Email				
Date				

2. Your Publicly Viewable Details	
Name/Organisation	
Status in relation to site	
Representing (if applicable)	

3. Site Location

Site Name			
Site address (inc. postcode if known)			
OS Grid Easting		OS Grid Northing	
Total Site Area		Developable Area	

Please attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site. The area of the site you wish to be formally assessed should be enclosed by a red line. Any other relevant land under your ownership should be enclosed by a blue line

4. Site ownership (please tick as appropriate and/or provide details)

Do you own the site?	Yes – sole owner	Yes – part owner	Yes – acting on behalf of the owner(s)	No
Is the site available?	Yes – immediately	Yes – In 5-10 years	Yes – 11+ years	No
Have you notified the landowner/other landowners that you have submitted the site?			Yes	No
Other relevant information eg is there a promotion / option agreement, is a developer on board etc				

5. Site Constraints (on site or at boundary – please mark as appropriate and/or provide details)

Current/previous use					
Adjacent land uses					
Planning History					
Existing Infrastructure	Electricity	Gas	Mains Sewer	Mains Water	Telecoms
Access from Highway	Yes – Classified Road		Yes – Unclassified Road		No
Highway Works					
Ransom Strips / third party land required etc					
Legal Issues					
Existing Occupiers					
Public Access/Rights of					

Way			
Topography			
Ecology/Wildlife Designations and other known issues	Yes – Details:	Reports/Mitigation Strategy:	No
Trees, hedgerows and woodlands (eg TPOs, other protections and designations)			No
Land Contamination / unexploded ordnance (in areas where this is relevant)	Yes – Details:	Reports/Mitigation Strategy:	No
Heritage Designations (eg listed buildings, conservation areas, local list, archaeology etc)	Yes – Details:	Reports/Mitigation Strategy:	No
Flooding	Yes - details	Reports/Mitigation Strategy:	No
Other Physical Constraints	Yes – Details:	Reports/Mitigation Strategy:	No

(eg water bodies, ditches etc)			
Infrastructure Constraints (eg pylons, gas mains, telecommunications etc)	Yes – Details:	Reports/Mitigation Strategy:	No
Open space and recreation Eg playing pitches, parks and gardens, allotments and orchards etc	Yes - details	Reports/Mitigation Strategy:	No
Other Knowns Issues/Constraints			

6. Site Accessibility (please provide distance as measured from the middle of the site “as the crow flies” and utilise journey planner to determine walking time)

Distance to closest bus stop (m/km)		Walking time to closest bus stop (mins)	
Distance to closest amenities (m/km)		Walking time to closest amenities (mins)	
Distance to closest rail station (m/km)		Walking time to closest rail station (mins)	
Any known issues with public transport – frequency of services etc		Any known issues with amenities eg limited capacity at schools, GPs etc	
Other accessibility issues relevant to the nature of the proposal			

7. Previous site promotional work (please cross reference with Section 5 where relevant)

Has any work been undertaken to promote the site and/or to overcome constraints?	Yes	No
If yes, please provide more details and copies of reports where available:		
Have any viability appraisals been undertaken?	Yes	No

If yes, please provide more details and provide copies of reports where available:

Are there any specific or immediate intentions to start development?	Yes	No
--	-----	----

If yes, please provide more details (such as Pre-application discussions)

8. Proposal Details (please mark as appropriate and/or provide details)					
Description of Proposed Development					
Proposed Land Use	Residential	Employment	Retail	Mixed	Other
Site capacity/density (homes/floor space)			Details of mixed/other land uses		
Potential Development	For sale/marketed for development		Negotiations with developer	In control of developer	Ready for release by owner
Development time scales	Short term (within 5 years)		Medium term (6-10 years)	Long term (11-15 years)	Beyond (16+ years)
Development Timescale/Phasing (incl. build-out)					

rates)

9. Additional information eg relevant evidence, other constraints and challenges, market desirability, planned infrastructure, opportunities etc

--

10. If the site fits the criteria for a brownfield site are you happy for us to include it on the relevant LPA brownfield land register (tick as appropriate)

Yes

No

11. Would you like to be added to the planning policy consultation database (tick as appropriate)

Yes

No

Privacy Notice

Coventry City Council will use your personal information to fulfil your request to be included on the Planning Policy consultation database and to process any representations and information which you submit to us to help us develop and deliver appropriate planning policy. We will work with the Planning Inspectorate and independent Neighbourhood Plan examiners to provide statutory plan examination services where appropriate.

We will also share information about you with the Planning Inspectorate and Neighbourhood Plan examiners in order to ensure that your representations can be considered at examination and that you can be invited to participate should this be appropriate.

More details about how we use information about you can be found in the full privacy notice, this can be found using the following web address <https://www.coventry.gov.uk/planning-policy/planning-policy-consultations/2>

Appendix 2



Department for
Communities and
Local Government

Technical housing standards – nationally described space standard

March 2015
Department for Communities and Local Government



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Technical housing standards – nationally described space standard

Introduction

1. This standard deals with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.
2. The requirements of this standard for bedrooms, storage and internal areas are relevant only in determining compliance with this standard in new dwellings and have no other statutory meaning or use.

Using the space standard

3. The standard Gross Internal Areas set out in Table 1 are organised by storey height to take account of the extra circulation space needed for stairs to upper floors, and deal separately with one storey dwellings (typically flats) and two and three storey dwellings (typically houses).
4. Individual dwelling types are expressed with reference to the number of bedrooms (denoted as 'b') and the number of bedspaces (or people) that can be accommodated within these bedrooms (denoted as 'p'). A three bedroom (3b) home with one double bedroom (providing two bed spaces) and two single bedrooms (each providing one bed space) is therefore described as 3b4p.
5. This allows for different combinations of single and double/twin bedrooms to be reflected in the minimum Gross Internal Area. The breakdown of the minimum Gross Internal Area therefore allows not only for the different combinations of bedroom size, but also for varying amounts of additional living, dining, kitchen and storage space; all of which are related to the potential occupancy.
6. Relating internal space to the number of bedspaces is a means of classification for assessment purposes only when designing new homes and seeking planning approval (if a local authority has adopted the space standard in its Local Plan). It does not imply actual occupancy, or define the minimum for any room in a dwelling to be used for a specific purpose other than in complying with this standard.
7. Minimum floor areas and room widths for bedrooms and minimum floor areas for storage are also an integral part of the space standard. They cannot be used in isolation from other parts of the design standard or removed from it.

8. The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls¹ that enclose the dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Area should be measured and denoted in square metres (m²).
9. The Gross Internal Areas in this standard will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.

Technical requirements

10. The standard requires that:
 - a. the dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below
 - b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom
 - c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide
 - d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m²
 - e. one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide
 - f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m² within the Gross Internal Area)
 - g. any other area that is used solely for storage and has a headroom of 900- 1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all
 - h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m² in a double bedroom and 0.36m² in a single bedroom counts towards the built-in storage requirement
 - i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area

¹ The internal face of a perimeter wall is the finished surface of the wall. For a detached house, the perimeter walls are the external walls that enclose the dwelling, and for other houses or apartments they are the external walls and party walls.

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

*** Notes (added 19 May 2016):**

1. Built-in storage areas are included within the overall GIAs and include an allowance of 0.5m² for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger.

2. GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with 5 or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included without increasing the GIA provided that all aspects of the space standard have been met.

3. Where a 1b1p has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.

4. Furnished layouts are not required to demonstrate compliance.

Appendix 3

Infrastructure Delivery Plan update (current status)

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Utilities					
City wide	Development of new additional utility networks and enhancements to existing utility networks to enable zero carbon, resource efficient, resilient and adaptable buildings and transport, with appropriate energy supply capacity for expected future demands (both current and new need), across the city.	To support achievement of net zero objectives, improve climate resilience, optimise heating/cooling helping to manage costs	To be determined through procurement process and subsequent business plans	To be determined.	Local Plan Period
Air Quality					
Improvements to air quality across the city will be made in-line with the priorities set out in the Climate Change Strategy and the Local Transport Plan and will be delivered throughout the life of the Local Plan.					
Water and flooding					
City wide	General water supply.	Work with Severn Trent Water to ensure water supply to new developments is identified within their investment programme. This will ensure adequate provision is made for new developments.	Developer, Severn Trent Water (STW) and Environment Agency (EA) if needed. Water Cycle Study evidence base being updated	Presently unknown.	Local Plan Period
City wide	Waste water and sewage facilities.	Work with STW to ensure waste water and sewage can be adequately dealt with and is identified within their investment	Developer, Severn Trent Water and Environment Agency if needed.	Presently unknown.	Local Plan Period

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
		programme. This will ensure new developments are adequately managed and supported.	Water Cycle Study evidence base being updated		
City wide	Flood Prevention programme.	Prevent/mitigate potential issues in the future, and resolve existing issues. To ensure all homes, business and public spaces are free from flood risk.	Developer, Severn Trent Water and Environment Agency. New strategic Flood Risk Assessment produced. Water Cycle Study evidence base being updated	To resolve existing issues will cost approximately between 4million and £5million.	Local Plan Period
Gypsy and Traveller site at Siskin Drive	Management and where appropriate, upgrading of flood alleviation bund.	To prevent flood risk to the site and support on- going maintenance of flood barrier.	Initial funding has already been secured and the bund created. Funding for on-going maintenance is to be reflected within appropriate budgets. Partnership approach with Homes England and EA.	Presently unknown.	Local Plan Period
Stoke Aldermoor	Upgrade to water supply provision and pipe network.	Improvement to overall water distribution, aided by the removal of Pressure Reducing Valve.	Funding sourced from both EA and STW.	Presently unknown.	Medium term(3-5 years).
City Centre - River	De-culverting the	To support the day	Developer	Approximately	Across Plan

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Sherbourne	river, especially in the proximity of Fairfax Street.	lighting of the River Sherbourne within the city centre and promote environmental and economic benefits of this.	contributions, UK Shared Prosperity Fund (UKSPF), Coventry City Council (CCC) and private investors.	£40,000 per metre	Period
Broad Lane/Banner Lane; Canley Brook; Upper Brookstray	Flood alleviation measures.	Based on FCERM 6 year programme, review of recent flood events and the high-level identification of potential flood storage locations in the updated SFRA. Essential to ensure that flood risk is not increased in areas where future development and growth is proposed.	Funding sourced exclusively from EA.	Presently unknown.	Short Term (1-2 years).
Lake View Park	Creation of targeted wetland area to promote environmental and flood alleviation improvements.	Promote environmental enhancements and support wider flood alleviation measures that creates wetlands and riverine restoration.	Funding sourced from both EA and Warwickshire Wildlife Trust (WWT).	£30,000.	Over plan period
Prior Deram Walk and the railway corridor, Canley	Regeneration of local park and green corridor to the south of the railway.	Enhanced quality of provision will help offset loss of lower quality green spaces to support regeneration projects.	Led by CCC with developer contributions and voluntary groups.	Presently unknown.	Medium Term (3-5 years).

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Swanswell Pool and Volgograd Place	Extension of Swanswell Pool and refurbishment of Volgograd Place.	To promote high quality green and blue infrastructure in the city centre.	Charging through developer contributions. In addition to funding contributions from; UK Shared Prosperity Fund (UKSPF), CCC and private investors.	Presently unknown.	Local Plan Period
Sport and recreation					
North West Leisure Facility	Leisure Centre with potential swimming pool, sports hall and strategic sporting offer	North West housing growth	City Council, Public Leisure Operator	TBC	TBC
Brandon Wood Golf Course	Require improvement on golf course and bring back driving bays – wider offer leisure developed	Playing Pitch strategy	City Council	TBC	TBC
Football Hubs – Coundon Hall Park and War memorial Park <u>9v9 grass:</u> NE – 0.5 match sessions City wide – 5 match sessions. <u>5v5 grass:</u> NE – 1 match session City wide – 5 match	Consolidating match pitches and improving the quality of match pitches	Playing Pitch strategy. To address the shortfall of pitches.	City Council, Football Foundation, FA	TBC	TBC

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
sessions					
3G facilities shortfall: NW – 2 x 3G pitches SW – 0.5 x 3G pitches SE – 1 x 3G pitches	<u>NW area</u> Cardinal Newman Woodlands Coundon Court <u>SW area</u> Coventry University or alternative <u>SE area</u> Caludon Castle Sports Centre	To meet shortfall	City Council, Football Foundation, FA, schools, clubs	Circa £1m per 3G	2023 onwards
Cricket Wickets shortfall of pitches SE – 24 sessions SW – 24 sessions	Sites to be identified as part of the playing pitch action plan	Playing Pitch Strategy	City Council, ECB	TBC	TBC
Rugby Union shortfall of pitches NE area – 14.5 match sessions NW area – 4.75 match sessions SE area – 9.5 match sessions SW area – 12.5 match sessions City wide – 41.25 match sessions	Sites to be identified as part of the playing pitch action plan	Playing Pitch Strategy	City Council, RFU	TBC	TBC

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Transport					
Future public transport network plan	Development of an integrated public transport network plan for Coventry, responding to factors such as the outcome of bus service network reviews, the outcome of the WM On Demand pilot scheme, network development work for the CVLR, and business cases for new railway stations and services			N/a	3-15 yrs
Coventry Very Light Rail (CVLR) 'demonstration project'	Development of a short section of track between Coventry Railway Station and Pool Meadow Bus Station to allow CVLR vehicles to be tested in a live environment. This section will eventually form part of Route 1		City Region Sustainable Transport Settlement (CRSTS)	£25-£50m	2 yrs
CVLR Route 1	A first CVLR route, connecting Coventry Railway Station to University Hospital		CRSTS/ Other sources TBC	£100m+	3-5 yrs
Further CVLR routes	Development of a further network of VLR Routes serving various key locations across the city		TBC	£100m+	6-15 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Tile Hill Station improvements	Station improvements aimed at establishing Tile Hill as a transport interchange/Park & Ride site, serving the West side of the city		CRSTS, Partnership with Transport for West Midlands (TfWM)	<£10m	3 yrs
New direct connections to East Midlands	Establishing a direct rail connection between Coventry, Leicester and Nottingham		Midlands Connect / Rail Network Enhancement Pipeline (RNEP)	£100m+	6-15 yrs
More frequent service to Leamington, Kenilworth and Nuneaton	Improvements, including at Coventry Station and some double tracking of the line between Coventry and Leamington, to enable an increased service of two trains per hour		Midlands Connect / RNEP	£100m+	6-15 yrs
Potential further new railway stations	Potential further new railway stations at Binley & Willenhall, Coundon, Coventry South and/or Foleshill. Further work is required to determine whether some, or all, of these stations would be viable		RNEP, Partnership with TfWM / West Midlands Rail Executive (WMRE)	TBC depending on how many of the 4 potential sites are considered viable	6-15 yrs
Expanded trial of WM On Demand	A wider rollout of the existing WM (West Midlands) On Demand bus services, initially on a trial basis. This would see the service area expand to cover the whole		TfWM/ Developer contributions	<£10m	2 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	city and the service's operating hours also extended, with potential for merging operations with other similar services such as Ring and Ride				
Bus Service Improvement Plan (BSIP)	Delivery of plans set out in TfWM's BSIP, including freezing fares, expanding the use of contactless payments, ensuring tickets can be used across different operators and expanding the use of real time information at bus stops		BSIP, TFWM	£50-100m (WMCA full area)	3 yrs
All Electric Bus City	All buses operating in the city to be replaced with electric buses		DfT - All Electric Bus City grant (£50m)/ Bus operator contributions, TFWM	> 100m	4 yrs
Ansty Park & Ride	Establishing an, initially bus-based, park and ride service at Ansty as part of the Coventry and Warwickshire CLEAN Hub project (with the potential to add a CVLR service at a later date)		Partnership with Warwickshire County Council (WCC) / Rugby Borough Council (RBC)	£50-100m	3-4 yrs
Local Cycling and Walking Infrastructure Plan (LCWIP)	Development of a more detailed plan of walking and cycling improvements			N/a	3-15 yrs
City Centre Traffic Management Plan	Introduction of further restrictions on car travel within the Ring Road, with the aim of ensuring		CRSTS	<£10m	2 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	that the whole city centre is designed primarily as a pedestrian friendly environment				
Further city centre public realm improvements	Ongoing programme of further public realm improvements in the city centre		TBC – potential for developer contributions	Ongoing programme	2-5 yrs
Local centre improvements	Ongoing programme of improvements to various local centres around the city, including public realm improvements and better walking, cycling and public transport connectivity		TBC – potential for CRSTS and developer contributions	Ongoing programme	2-5 yrs
Ring Road junction remodelling	Remodelling of various Ring Road junctions	To remove congestion & improve pedestrian & cycle access in and out of the city centre	Programme/ Developer contributions	£25-£50m	4-5 yrs
Coundon and Binley cycleways	Completion of two fully segregated cycleways, connecting the city centre to Coundon and Binley		Coundon – Local Air Quality Action Plan (LAQAP) Binley - Transforming Cities Fund (TCF)/ Active Travel Fund (ATF)	<£10m each	1-2 yrs
University of Warwick cycle routes	Improved cycle connections between the University of Warwick and neighbouring residential areas, railways stations and the city centre		ATF/ Developer contributions/ Sustrans	<£10m	2 yrs
Foleshill Transport Package	The package includes segregated cycle facilities on Foleshill Road, as well as junction improvements on	Package of improvements to reduce the level of through traffic on Foleshill Road and	CRSTS	<£10m	2-3 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	the A444 (to accommodate traffic displaced from Foleshill Road)	encourage greater levels of active travel.			
Coventry South/ London Road Transport Package	Various improvements on the London Road corridor, including remodelling of key junctions and the installation of segregated facilities for cyclists		CRSTS/ Developer contributions	£10-£25m	2-3 yrs
Eastern Green cycleways	Two new cycleways connecting the planned Sustainable Urban Extension (SUE) at Eastern Green to the city centre and to Tile Hill Railway Station		Developer contributions	<£10m	2-4 yrs
Keresley Connects cycleways	New cycleways connecting the planned SUE in Keresley to the city centre and to Allesley/ Lyons Park		Developer contributions	<£10m	2-4 yrs
Further cycle network improvements	Ongoing programme to develop and deliver further cycleways, informed by the LCWIP.		ATF/ Developer contributions	Ongoing programme	3-15 yrs
Liveable Neighbourhoods	Development of two initial Liveable Neighbourhoods, in collaboration with local residents		ATF	<£10m	1 yr
Further programme of Liveable Neighbourhoods and School Streets	Ongoing, community-led programme to establish further Liveable Neighbourhoods and School Streets		TBC	Ongoing programme	1-15 yrs
WM Cycle Hire	Ongoing expansion of the existing WM Cycle Hire scheme,		TfWM	Ongoing programme	1-15 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	with the aim of covering the whole city				
E-scooter rental scheme	Expansion and roll-out of the existing pilot scheme. Further actions dependent on national changes to legislation expected in 2023/24 subject to parliamentary timetable		TfWM	TBC	1-15 yrs
Updated Parking Strategy	Review of the Council's existing Parking Strategy			N/a	2-15 yrs
Transport Design Guide	Design guide for new transport infrastructure associated with development but also applying to Council schemes			N/a	2-15 yrs
Future highway network plan	Development of a more detailed planned of the city's future public transport network			N/a	3-15 yrs
A46 Binley Junction improvements	Complete installation of a flyover at the A46 Binley Junction (currently underway)		National Highways	£50-100m	1 yr
A46 Stoneleigh Junction improvements	Complete upgrades to the A46 Stoneleigh Junction (currently underway)		WCC	£25-50m	1 yr
LAQAP highways schemes	Complete various highway improvement schemes aimed at reducing air pollution at several pinch points, including Spon End, Ring Road Junction 7 and the Holyhead Road area (currently			£25-50m	1-2 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	underway)				
Keresley Link Road	A new connection through the planned Keresley SUE, linking Long Lane in the West of Coventry and Winding House Lane in the North. This will also remove through traffic from existing residential areas in NW Coventry			£10-£25m	3-4 yrs
A46 Walsgrave Junction improvements	Planned junction upgrade to improve journey times on a key strategic route		National Highways	£50-£100m	3-5 yrs
A46 Strategic Link Road	A new strategic link between the A46 South of Coventry (at Stoneleigh Junction) and either Solihull or the West of Coventry.	This would create a new travel corridor linking the North Warwickshire/South Coventry with UK Central Plus (including the new HS2 station) in Solihull	Partnership with WCC and Solihull Metropolitan Borough Council (SMBC)	£100m+	6-15 yrs
M6 Junction 3 improvements	Improvements to reduce congestion at a key junction		National Highways	£25-£50m	6-15 yrs
Highway maintenance programmes	Ongoing programme of work to maintain our highways, cycleways and footways according to identified prioritisation based on condition and other factors		CRSTS	Ongoing programme	1-15 yrs
Road safety programmes	Annual programme of road safety improvement schemes based on casualty reduction priorities		CRSTS	Ongoing programme	1-15 yrs
Average speed cameras	Ongoing programme to	Rolling out average speed camera	CRSTS	Ongoing programme	1-15 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	reduce vehicle speeds within the city.	enforcement, with the aim of installing these on all major radial routes into and out of the city according to a prioritised programme			
5G monitoring/ Connected Autonomous Vehicles (CAV) Testbed	Various projects aimed at preparing our highway network for the future	Includes testing of CAVs and the rollout of 5G monitoring and other projects involving trialling and rollout of new transport technology	TfWM/ Commercial/ Government research funding e.g. Innovate UK	Ongoing programme	1-15 yrs
Electric Vehicle (EV) Charging Infrastructure Strategy	Development of a more detailed plan to expand the city's electric vehicle charging infrastructure		N/a	Office of Zero Emission Vehicles (OZEV)	3-15 yrs
Local EV charging hubs	Programme of EV charging/ multi-modal transport hubs in various locations around the city		Ongoing programme		2-15 yrs
Decarbonisation of the taxi fleet	Transition the taxi fleet operating in the city to zero emission vehicles in line with the Council's taxi licensing policy		N/a	Partnership with the private sector	3-15 yrs
Coventry and Warwickshire CLEAN Hub	Creation of a multi-modal transport interchange initially with electric vehicle charging facilities and park and ride services, with further features to be added later		£50-100m	Partnership with the private sector	3-4 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Trial of dynamic charging of electric vehicles	Development of “wireless” charging allowing EVs to be charged on the move.		<£10m	Partnership with the private sector	5 yrs
Green Innovation Park	Creation of a ‘super charging hub’ for electric vehicles		£10-£25m	OZEV	5 yrs
Public electric vehicle charge points network expansion	Ongoing programme to expand the city’s network of public electric vehicle charge points		Ongoing programme	National Highways / CCC	1-15 yrs
E-Fleet - Try Before You Buy electric vehicle scheme	Ongoing operation of the Council’s Try Before You Buy electric vehicle scheme for local businesses utilising electric vehicles purchased for the Council’s own fleet		Ongoing programme	Private sector	1-15 yrs
Expansion of car clubs/ car sharing services	Ongoing work with commercial partners to expand the provision of car clubs/ car sharing in the city, and encourage the provision of more shared electric vehicles		Ongoing programme		1-15 yrs
City centre freight consolidation centre review	Consider options to establish freight consolidation centre(s) as part of the wider redevelopment of Coventry city centre. Further actions will depend on the outcome of the review		<£10m	Partnership with public, private and academic sectors	1-2 yrs
Project Skyway	Investigation of the potential for drones to undertake longer distance deliveries along pre-determined corridors		£50-100m	Partnership with WCC	2-3 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Ansty freight consolidation centre	Establishing a freight consolidation centre in Ansty as part of the Coventry and Warwickshire CLEAN Hub project		TBC	Partnership with TfWM and private sector	5-15 yrs
Last Mile Freight* * Timescales for this project are still to be determined	Investigation of potential for parcel lockers, drone delivery and other innovative solutions to last mile deliveries building on the Urban Air Port demonstrator project				
Mobility Credits vehicle scrappage scheme trial		Completion of an initial pilot of a vehicle scrappage scheme, where participants receive credits in exchange for scrapping an older, heavily polluting vehicle	<£10m	TfWM	1 yrs
Mobility Credits incentive scheme trial	Further pilot scheme where residents moving into newly completed homes in Keresley and Eastern Green	Mobility Credits to encourage them to travel by sustainable means	<£10m	Developer contributions	2-15 yrs
Travel Demand Management	Ongoing programme of activity to promote and encourage sustainable travel choices		Ongoing programme	TfWM	1-15 yrs
Education					
Engagement with schools and businesses	Ongoing programme of engagement with local schools and businesses to help them to encourage and support		Ongoing programme		1-15 yrs

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	residents to travel to school/work via sustainable modes, including the development of an Employer / Business Network to share and implement best practice on sustainable travel initiatives				
Regular community events	Ongoing programme including, for example, cycle training and community cycling events		Ongoing programme		1-15 yrs
New primary school at Bannerbrook	Site already secured, funding relates to the delivery of actual school buildings. To support a 2FE primary school.	To accommodate the increase in demand driven by recent developments as well as new site proposals as Eastern Green and Cromwell Lane.	Charging through Section 106 agreements, and funding from EFA.	£5 million for Banner Brook Primary School, excluding the cost of site provision.	Land returned to Developer due to larger parcel of land secured at Eastern Green
Little Heath Primary School	Additional school places to meet potential increased demand. Additional places generated by converting school from 1 form entry to 2 form entry.	Accelerate development of 400 homes generating the need for primary school places.	Charging through Section 106 agreements, and funding from EFA.	£2.2 million.	Project Completed in 2014 Funding to be given in instalments, but to be completed no later than 2018.
Whitmore Park Primary School	Provision of new primary school places. Additional places generated by converting school from 2 form entry to 3 form entry.	To meet increased demand in local catchment. Charging through Section 106 agreements, and funding from EFA.	Charging through Section 106 agreements, and funding from EFA.	£1.25 million.	Project Completed in 2015

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
New primary school at New Century Park	Provision of new primary school to meet increased demand. New 2FE primary school with supporting land.	To respond to increased demand as part of recent developments at New Stoke Village and New Century Park.	Charging through Section 106 agreements, and funding from EFA.	£5 million for New Century Park Primary School plus land provision.	Land returned to Developer due to local birth rate
New Secondary School for North and West to provide additional spaces and respond to need.	Existing need for north west Coventry has been identified as 1 form entry required in 2017, 2018, 2019, and 2020. Increasing to 8 form entry by 2021.	To meet increased demand in local catchment.	Charging through Section 106 agreements, and funding from EFA.	North West Coventry - approximately £7.5 million, excluding the cost of site provision.	Additional School Places being provided through expansions at existing schools rather than new School
New Secondary School for South and East to provide additional spaces and respond to need.	Existing need for south east Coventry has been identified as 1 form entry in 2019 and 2020. Increasing to 3 form entry by 2021.	To meet increased demand in local catchment.	Charging through Section 106 agreements, and funding from EFA.	South East Coventry – approximately £12.5 million.	Additional School Places being provided through expansions at existing schools rather than new School
The former Alice Steven's site adjacent to Whitley Abbey Primary School	Primary Broad Spectrum Special School.	To meet the needs of children with SEND. Provision of forms of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from developer contributions.	Approximately £10 million.	Project Completed in 2016

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
President Kennedy school	New 6th form building to include general teaching classrooms for 20 students each and science teaching space - New build 6th form located on playing fields. Reconfiguration of 2 football pitches and relocation of MUGA.	Due to rising demand for school places and within the One Strategic Plan for Education, a form of entry (FE) is being added to the school.	Charging through Section 106 agreements, and funding from DfE.	£7,000,000	Completed in 2021
Coundon Court	New build teaching block, extension to existing Hall, car park relocation and extension.	Due to rising demand for school places and within the One Strategic Plan for Education, 2 forms of entry (FE) are being added to the school.	Charging through Section 106 agreements, and funding from DfE.	£7,000,000	Completed in 2021
Cardinal Newman	Construction of a new dining hall, additional teaching space. Two temporary modular units required.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£6,000,000	Completed in 2021
Barr's Hill	New teaching block / hub. Internal refurbishments to changing room and gym block refurbishment. External works.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£10,000,000	Completed in 2022

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Sidney Stringer	The project requirements are to refurbish the ground, first and second floor Swanswell building by creating a double story hall and refurbishment of existing offices and music room.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£500,000	Completed in 2022
Lyng Hall	4 classroom block, dining area expansion to provide increased internal dining and extension of sports hall.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed by 2023
Stoke Park	Refurbishment classrooms and changing rooms. External landscaping and pitch enhancement.	Due to rising demand for school places and within the One strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed by 2023
Ernesford Grange	To expand Ernesford Grange & the co-located Riverbank Academy by 1 form of entry for an additional 150 pupils and SEN expansion for an additional 36 pupils.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£9,000,000	Completed in 2022

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Riverbank		To meet the needs of children with Special Educational Needs or Disabilities. Provisions forms part of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from DfE.	£9,000,000	Completed in 2021
Finham	Expansion of school's physical capacity to accommodate a permanent increase of 30 pupils from September 2021 - an organic growth of 150 pupils over a five-year period. New provision of additional canteen space, six additional classrooms, exam room space and associated ancillary space	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£6,000,000	Completed in 2022
Bishop Ullathorne	Provision of New Sports Hall on school site	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£3,000,000	Completed by 2023

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
Finham 2	Refurbish Edwards Keep to form new classrooms and changing facilities, update the current DT Workshop into a new food technology space, refurbish the existing science classroom in to a STEM classroom and expand the sports facilities to create a new Muga that has previous planning approval.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed by 2023
Westwood	Temporary accommodation for September 2021: changing space (split for girls and boys) and 2 x general teaching classrooms Refurbishment of existing DT classroom (complete) (to create 2 x general teaching classrooms), refurbishment of existing Art classroom (to create 2 x general teaching classrooms) September 2023 permanent changing space (new standalone block)."	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed by 2023
Sherbourne	Internal refurbishment of the school and the creation of new school	To meet the needs of SEND. Provisions forms part of school management programme to make	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed in 2020

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	buildings for the use of Secondary age pupils	more efficient use of resources and better deliver services.			
Baginton (Rebuild)	A potential project to rebuild and expand Baginton Special School to accommodate additional pupils.	To meet the needs of children with Special Educational Needs or Disabilities. Provisions forms part of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2027
Woodlands	SEMH Woodfield's schools currently across 2 sites with buildings that have been deemed unsuitable for purpose in the long-term. There is an opportunity to use the site formally occupied by Woodlands School. This site contains listed buildings and successfully provides community sports use. The project is to enable the integration of the Primary and Secondary schools onto one site and continue to provide the community sport provision.	To meet the needs of children with Special Educational Needs or Disabilities. Provisions forms part of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from DfE.	To be finalized with contractor undertaking work	Completed by 2024

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	It is proposed to dispose of the Primary and Secondary site for development to provide funding for the main scheme."				
Foxford	The reprovision of school buildings to provide additional school capacity	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed in 2022
Cardinal Wiseman	"3 modular classrooms and extension of existing classroom to create science room (external extension with internal refurbishment). The school may wish to extend across the full width of the building and will be provided prices to confirm if they wish to proceed at their costs.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed by 2023
Blue Coat	Initial discussions with school indicate that the works will comprise the following element - Provision of new single story sixth form block (6 classrooms) for	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed by 2023

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
	September 2023				
The Link	2 Storey extension and refurbishment of existing facility to provide additional pupil places for 2022. The existing building is to be refurbished.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£5,000,000	Completed in 2022
Keresley SUE New School	Due to new housing in the local area, land has been secured for a 2FE Primary School	Due to rising demand for school places due to housing in the local area and within the One Strategic Plan for Education, a new school building will be created on site.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2027
Eastern Green New School	Due to new housing in the local area, land has been secured for a 3FE Primary School	Due to rising demand for school places due to housing in the local area and within the One Strategic Plan for Education, a new school building will be created on site.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2030
Health Infrastructure					
New health centre at Foleshill	New health facilities.	To provide new high quality premises to support health provisions within the area.	Charging Section 106 agreements and Section 278 agreements. Funding from the NHS and Integrated Care Boards.	Cost to be determined as scheme specific details emerge.	TBC

Site Name location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
New health centre at Keresley SUE	New health facilities.	To provide new high quality premises to support the needs of a new community.	Charging Section 106 agreements and Section 278 agreements. Funding from the NHS and Integrated Care Board	Cost to be determined as schemespecific details emerge.	TBC
Expansion of existinghealth services at Walsgrave	Expansion of existing health facilities.	To ensure accessibility to high quality health care facilities for both present residents of Coventry and those that will reside in new developments.	Charging through Section 106 agreements and Section 278 agreements. Funding from the NHS and ICB.	Cost to be determined as scheme specific details emerge.	Across Development Plan Period
Cross Boundary Infrastructure					
Through the Duty to Cooperate the City Council will work with its Warwickshire neighbours to identify key cross boundary infrastructure in Warwickshire that have a close or direct relationship with Coventry and the delivery or facilitation of its wider housing and employment needs.					

Appendix 4 – Glossary

AAP - Area Action Plan

A Development Plan Document which focuses upon a specific location or an area subject to significant change.

Affordable Housing

Housing, including social rented and intermediate housing, for people whose needs are not met by the housing market.

AMR - Annual Monitoring Report

Report published once a year by local planning authorities or regional planning bodies assessing progress with and the effectiveness of policies.

AQMA - Air Quality Management Areas

Designation made by Local Authority where assessment of air quality requires action plan to improve the air quality.

Article 4 Direction

A direction under Article 4(2) of the General Development Order, which may require approval by the Secretary of State, bringing under the control of the local planning authority any specified developments normally permitted under the Town and Country Planning (General Permitted Development) Order 2015.

Biodiversity

The innumerable and diverse species of animals, plants and other living things in a particular area, and the wide range of urban and rural habitats where they live.

Biodiversity Action Plan

A strategy prepared for a local area aimed at conserving and enhancing biological diversity.

BNG - Biodiversity Net Gain

An approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand.

Brownfield Land

Previously developed land occupied by a permanent structure and associated development, such as car parking, which can be re-developed for other uses.

Build to Rent

Purpose built housing that is typically 100% rented out. It can form part of a wider multi tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development

Coventry Local Plan 2011-2031

The existing statutory land use Plan for the city which the Local Plan will supersede. It comprises the policies against which proposals for physical development are currently evaluated and provides the framework for change and development in the city.

CIL - Community Infrastructure Levy

A levy placed on development, to fund new or additional infrastructure needs.

Circular

Non statutory advice and guidance on particular issues which expands and clarifies subjects which are referred to in national legislation.

Climate Change Strategy 2023-2030 – A Green Future for a Changing City

The Council's strategy, part of the One Coventry Plan 2022-2030, focusing on pathways to address sustainability and climate change issues to ensure future economic growth as well as helping to address the inequalities of residents.

Comparison Shopping

Items not bought on an everyday basis, but after comparison of alternatives from various sources such as clothes, shoes and electrical items.

Conservation Area (CA)

Area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.

Convenience Goods

Items bought on an everyday basis such as food-shopping.

CPO - Compulsory Purchase Order

An order issued by the government or a local authority to acquire land or buildings for public interest purposes. (e.g. Land for new roads).

Central Shopping Area

The main retail area within the city centre. It meets the convenience and comparison shopping needs of the city's population and also acts as a sub-regional retail centre to some degree. It contains local needs shops, national comparison multiples and a range of small independent specialist shops.

Coventry and Warwickshire Local Enterprise Partnership (CWLEP)

Local Enterprise Partnerships are locally-owned partnerships between local authorities and businesses and play a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs. They are also a key vehicle in delivering Government objectives for economic growth and decentralisation, whilst also providing a means for local authorities to work together with business in order to quicken the economic recovery.

Density

In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

Development

Development is defined under the Town and Country Planning Act 1990 as "the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land".

District Centre

Significant group of shops serving a large part of the city including both comparison and convenience shopping, as well as other commercial and public services and facilities.

Development Plan Document

One of a family of documents which sets out the land allocations and spatial planning policies for all or specific parts of the local authority area. When approved or adopted, DPDs will form part of the Development Plan. Some DPDs may refer to areas outside a local authority boundary as there may be issues of shared interest with other local authorities.

Edge of centre

The definition in the NPPF states: that for retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining

whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

GPDO - General Permitted Development Order

The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) grants rights (known as permitted development rights) to carry out certain limited forms of development without the need to make an application for planning permission

Green Belt

National policy designation that helps to contain development, protect the countryside and promote brownfield development and assists in the urban renaissance. There is a general presumption against inappropriate development in the Green Belt.

Greenfield

An open green area of land that is undeveloped

Gypsy and traveller site

Site for settled occupation, temporary stopping place or transit for gypsies and travellers.

HELAA – Housing and Economic Land Availability Assessment

Replaces the Strategic Housing Land Availability Assessment (SHLAA) and is an assessment which seeks to identify land which is suitable, available and achievable for housing and economic development, which acts as an evidence base for the Local Plan.

HEDNA – Housing and Economic Development Needs Assessment

Replaces the Strategic Housing Market Assessment (SHMA) and is a joint and integrated assessment of the need for housing, economic growth potential and employment land with the HMA.

Heritage asset

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest, including statutory and local listings.

HIA – Health Impact Assessment

A combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population.

Housing Association

Independent, non-profit association that provides rented or shared ownership (intermediate) housing to people unable to afford to buy their own homes on the open market, or to specific groups, such as older people or the homeless.

HMA - Housing Market Area

Provides information on the level of need and demand for housing and the opportunities that exist to meet it across a defined area.

HMO – Housing in Multiple Occupation

Shared dwelling houses permanently occupied by members of more than one household of unrelated adults as their only or main residence, who share basic amenities such as a kitchen or bathroom. Changes of use from C3 residential to smaller 3-6 person HMOs (C4) are permitted by the GPDO. Planning permission is required where an HMO caters for 7 or more unrelated adults.

Listed Building

A building of special architectural or historic interest included on a statutory list. Listed Building Consent is required for their demolition or alteration to any part of the building and this applies equally to the interior as well as exterior.

Locally listed buildings

The Council maintains a list of buildings of local architectural or historic interest which it believes are worthy of conservation. Local listing brings with it no additional planning controls but is a material consideration when planning applications are considered.

Local Biodiversity Action Plan

This outlines how landowners, land-managers and policy makers will protect the characteristic wildlife and landscapes of an area.

Local Development Document

This includes two types of documents: Development Plan Documents (DPD), and Supplementary Planning Documents (SPD).

Local Development Order

Enables specified development or use/s of land and buildings that would normally need planning permission to go ahead without planning permission. Essentially extends 'permitted development' but only to the extent specified in the Order.

Local Green Space

Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities.

Local Plan

It comprises the policies against which proposals for physical development will be evaluated and provides the framework for change and development in the city.

Local Transport Plan

Local Authority Transport strategy.

LPA – Local Planning Authority

The public authority (The Council) whose duty it is to carry the planning function for the plan area (the administrative boundary of the City of Coventry).

Main Town Centre Uses

Uses as defined by the NPPF consisting of retail, commercial and community uses.

Major Development

10 or more (gross) residential units or developments of 1,000 sq ms or more of non-residential floorspace. When referencing this term consideration should be given to the definition contained within the Town and Country Planning Act (unless otherwise stated within the Plan(s)).

Marmot City

An evidence based strategy to address the social determinants of health, the conditions in which people are born, grow, live, work and age and which can lead to health inequalities. The City Council will use it to improve the health, wellbeing and life chances of the people of Coventry.

Neighbourhood Plan

A statutory plan prepared by a parish council or neighbourhood forum, in line with the Local Plan that introduces non-strategic planning policies in a designated neighbourhood area.

NPPF - National Planning Policy Framework

Government's planning policies.

One Coventry Plan

Sets out the Council's vision and priorities for the city, with three interconnected priorities and two key enablers for improving the life and residents and reducing inequalities.

Out of centre

A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Policies Map

A geographical representation of policies contained in the Local Plan.

Previously Developed Land

See Brownfield.

Planning Obligation

Legal agreements between a planning authority and a developer to ensure that certain works which are necessary and relevant to a development are undertaken or financial contributions made to facilitate associated infrastructure works and development.

Planning Policy Guidance

Government detailed guidance and interpretation on the policies set out in the NPPF.

Primary Shopping Area

Defined area where retail development is concentrated.

SA - Sustainability Appraisal

Appraisal to assess whether proposed plans and policies meet sustainable development objectives, and is mandatory under the Planning and Compulsory Purchase Act 2004. The aim is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of new or revised Development Plan Documents (DPD) and Supplementary Planning Documents (SPD) and includes assessment of social and economic inputs, in addition to environmental inputs.

S106 - Section 106 Agreement

Section 106 of the Town and Country Planning Act 1990 allows a local planning authority to enter into a legally-binding agreement or planning obligation with a landowner in association with the granting of planning permission.

Sequential Approach

Planning principle that seeks to identify, allocate or develop certain types of locations of land before others.

SSSI - Sites of Special Scientific Interest

An area of land identified and protected by Natural England as being of special nature conservation interest nationally.

Supplementary Planning Document

These are LDD documents (Local Development Document) that provides further detail of policies and proposals in a 'parent' Development Plan Document. Not subject to external scrutiny and without the status of DPDs, but are a material consideration in the evaluation of planning applications. They will replace Supplementary Planning Guidance (SPGs).

SuDS - Sustainable Drainage Systems

Absorb rainfall and release it gradually, improving drainage and reducing the risk of flash flooding.

Sustainable Development

Development that meets the needs of the present, without compromising the ability of future generations to meet their own needs.

Sustainable Transport

Modes of transport which are less damaging to the environment than cars including public transport, walking and cycling.

TPO - Tree Preservation Order

An order made by a local planning authority in respect of trees or woodlands to prohibit the cutting down, uprooting, topping, lopping, wilful damage, or wilful destruction of trees without the LPA's consent.

Town Centres

Defined area on the Policies Map where retail, commercial and community development is concentrated and where main town centre uses will be encouraged. References to town centres apply to city centres, town centres, district centres and local centres

Very Light Rail

A research and development project, using the latest automotive expertise in the region to develop an innovative track design and vehicle, and deliver an affordable light rail system, for Coventry and beyond.

Viability Appraisal

An assessment of the financial viability of a development to determine the maximum level of affordable housing and other policy requirements that can be provided.

Windfall Site

Site not specifically allocated for development in a Development Plan, but which unexpectedly becomes available for development during the lifetime of a plan.

Other

Use Classes Order

The Town and Country Planning (Use Classes) Order 1987 (amended) puts uses of land and buildings into various categories. Planning permission is not needed for changes of use within the same Use Class. The Government's Planning Portal set out the Use Classes as follows:

Class B

- **B2 General industrial** - Use for industrial process other than one falling within class E(g) (*previously class B1*) (excluding incineration purposes, chemical treatment or landfill or hazardous waste)
- **B8 Storage or distribution** - This class includes open air storage.

Class C

- **C1 Hotels** - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels)
- **C2 Residential institutions** - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres
- **C2A Secure Residential Institution** - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks
- **C3 Dwellinghouses** - This class is formed of three parts
 - C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child
 - C3(b) covers up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems

- C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger
- **C4 Houses in multiple occupation** - Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom

Class E

In 11 parts, Class E more broadly covers uses previously defined in the revoked Classes A1/2/3, B1, D1(a-b) and 'indoor sport' from D2(e):

- **E(a)** Display or retail sale of goods, other than hot food
- **E(b)** Sale of food and drink for consumption (mostly) on the premises
- **E(c)** Provision of:
 - **E(c)(i)** Financial services,
 - **E(c)(ii)** Professional services (other than health or medical services), or
 - **E(c)(iii)** Other appropriate services in a commercial, business or service locality
- **E(d)** Indoor sport, recreation or fitness (not involving motorised vehicles or firearms or use as a swimming pool or skating rink,)
- **E(e)** Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- **E(f)** Creche, day nursery or day centre (not including a residential use)
- **E(g)** Uses which can be carried out in a residential area without detriment to its amenity:
 - **E(g)(i)** Offices to carry out any operational or administrative functions,
 - **E(g)(ii)** Research and development of products or processes
 - **E(g)(iii)** Industrial processes

Class F

In two main parts, Class F covers uses previously defined in the revoked classes D1, 'outdoor sport', 'swimming pools' and 'skating rinks' from D2(e), as well as newly defined local community uses.

- **F1 Learning and non-residential institutions** – Use (not including residential use) defined in 7 parts:
 - **F1(a)** Provision of education
 - **F1(b)** Display of works of art (otherwise than for sale or hire)
 - **F1(c)** Museums
 - **F1(d)** Public libraries or public reading rooms
 - **F1(e)** Public halls or exhibition halls
 - **F1(f)** Public worship or religious instruction (or in connection with such use)
 - **F1(g)** Law courts
- **F2 Local community** – Use as defined in 4 parts:
 - **F2(a)** Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres
 - **F2(b)** Halls or meeting places for the principal use of the local community

- **F2(c)** Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms)
- **F2(d)** Indoor or outdoor swimming pools or skating rinks

Sui Generis

A use, which is not within any specific Use Class and for which any change of use, will require planning permission. Certain uses are specifically defined and excluded from classification by legislation, and therefore become 'sui generis'. Other uses become 'sui generis' where they fall outside the defined limits of any other use class. For example, C4 (Houses in multiple occupation) is limited to houses with no more than six residents. Therefore, houses in multiple occupation with more than six residents become a 'sui generis' use.

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Coventry Local Plan Review

Regulation 18: Issues and options consultation

Non-technical summary – July 2023



Coventry Local Plan Review : a non-technical summary

What is the Local Plan and why are we reviewing it

Coventry City Council adopted its [Local Plan and accompanying Area Action Plan](#) for the City Centre in December 2017. These documents set out how much and what kind of development is needed up until the year 2031, where it should go, and what policies should be applied in order to help the Council decide whether planning applications are acceptable or not. They are known as Development Plan Documents (DPDs) and are prepared in line with a strict legal process.

The Government currently requires that the policies of the adopted Local Plan should be reviewed every five years to see if they are up to date or whether they need changing or even rewriting to reflect changes to national policy or other matters.

This is what we are now doing. We are carrying out a full review which means that we are reviewing every policy to see what needs changing and why, and whether there are any new policies we should be introducing.

In particular we need to be considering the review of the plan in the light of changes to [national government planning policy](#), and the Council's priorities including the [One Coventry Plan](#) and the emerging [Climate Change strategy](#).

How to comment

We are consulting on our ideas for updating the plan (The Issues and Options Consultation) from Tuesday 18 July with the final day for comments on Tuesday 12 September 2023. The document where we review the policies and ask questions about our proposals is called Issues and Options and it is supported by a Sustainability Appraisal and an Equalities & Health Impact Assessment which you can also comment on.

If you are viewing this online the best way to respond is to comment online using our [consultation portal](#). This is our preferred approach as you can manage your own account and keep your details up to date.

You can also come and see us at our drop in sessions, or book on to one of our webinars to find out more. We will put copies of the timetable for these in the libraries and will put all information on our [consultation web page](#).

You can also scan the code at the end of this document to take you to our web page

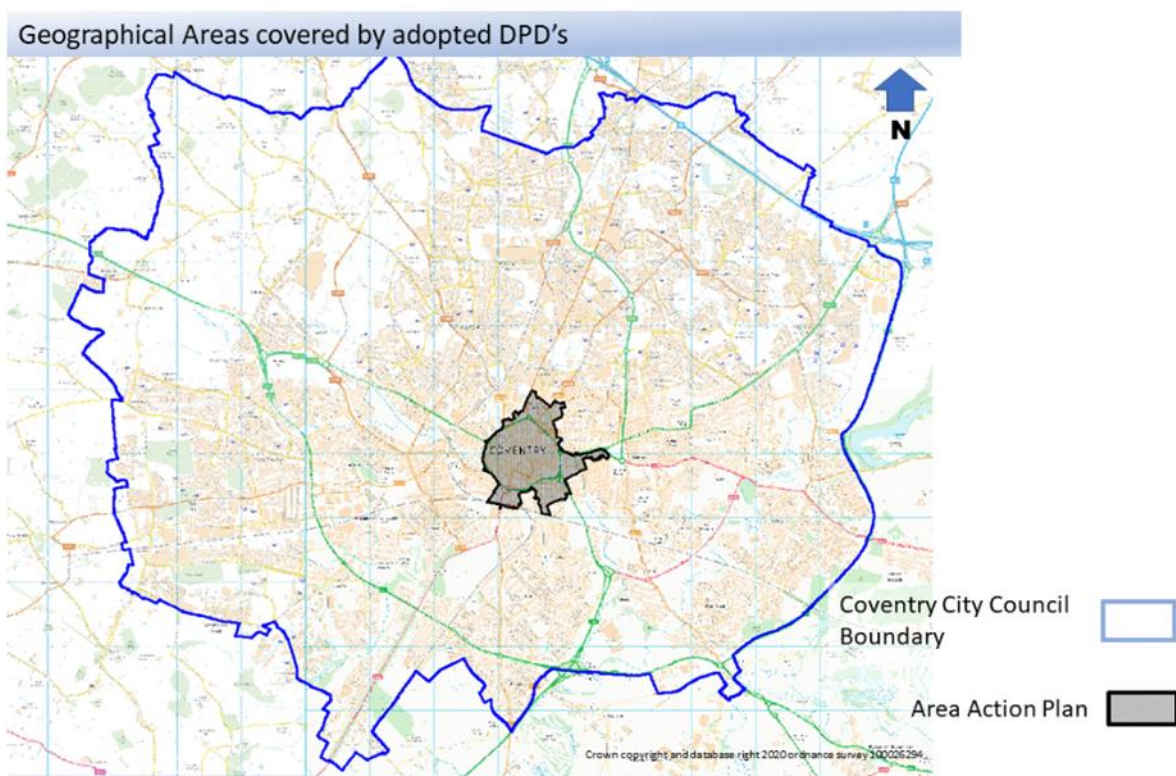
What happens after the consultation has finished

We will review everyone's comments and use them to help us write the updated policies. We also need to ensure that we have detailed evidence to demonstrate that the policies are workable and can be delivered. We have some of that evidence already which we will publish [online](#) to help inform the consultation and we explain this in a series of topic papers on a range of subjects including climate change, health, housing, employment, retail and town centres, biodiversity and green infrastructure, transport. As part of the consultation we will consider what other evidence we may need to help us develop our policies.

We will then consult again once we have drafted the policies, before submitting the documents to Government so that an independent Planning Inspector can examine the plan. The examination normally involves a series of public hearing sessions so that the Inspector can be satisfied that the final plan has been fairly and clearly prepared, is based on robust evidence and can be delivered.

The area covered by the Local Plan and Area Action Plan

The map below shows the area covered by the Local Plan and the Area Action Plan



The policy areas we are reviewing

Health and wellbeing

At the moment the Health and Wellbeing policy is focused upon major planning applications, requiring them to consider health issues by undertaking a Health Impact assessment. We are proposing to widen out the policy so that more proposals must address health issues including the way places are designed to help people keep mentally and physically healthy and active

Levels of growth and the Duty to Co-operate

Local Plans need to plan ahead for the amount of growth they need to accommodate and this needs to be based on up to date evidence. We have worked with our partner Local Authorities in Warwickshire as our housing and economic markets are closely linked, and we have recently published the Housing and Economic Development Needs Assessment (HEDNA) which sets out how growth should be calculated and explains this in detail.

The Government sets out how we should calculate our housing needs using the 'standard methodology'. One of the inputs to the 'standard method' uses population projections from 2014, and these have found to be inaccurate for Coventry. Using the calculation, Coventry would need to deliver 3,188 homes each year as a minimum (using 2021 as the starting point, at least 63,760 homes over the plan period to the year 2041)

Given that the 2014 population projections are wrong, we are proposing to use the more up to date 2021 Census figures in our calculation as we feel they are more accurate (this is the figure the HEDNA uses), this results in 1,964 homes a year (at least 39,280 homes over the plan period to 2041)

However, the way in which we are required to calculate our figures means that the Government adds in an 'uplift' of 35% for a number of cities of which Coventry is one. Without this 'uplift', Coventry would need to deliver at least 1,455 homes each year or 29,100 over the plan period to 2041.

We are asking for feedback on what level of growth is appropriate for the city to help us meet our needs (see the housing section), and we know we need to do further work to look at how much capacity we have (given that some of this growth is already underway).

In terms of employment the HEDNA calculates that we need to deliver around 8.5 hectares of office space, and 147.6 hectares of general industrial land over the plan period. In the employment section we suggest that we already have enough land allocated to meet this need. However, there is an emerging strategic issue regarding

the demand for modern large logistic sites which is having an impact across the west Midlands region and further evidence is being produced in conjunction with other Local Authorities on this matter to better understand the needs and where such sites should be located.

We need to ensure that we deliver growth in a sustainable way so that we balance our economic, environmental and social needs in a way that is consistent with national policy. We have a legal Duty to Co-operate with various organisations to make sure that this happens.

Jobs and Economy

National Policy has changed in terms of the way in which 'employment' is defined and we need to make sure that our policies reflect this. We think we can strengthen our policies to help ensure that employment development takes account of and helps to address climate change including the 'green economy'.

We need to make sure that we are providing enough employment land to meet our needs.

We need to consider how we will treat planning applications for 'non employment' uses on employment land.

We need to consider how we deal with offices especially now that working patterns are changing rapidly with more remote and hybrid working.

We need to look at the needs of the storage, distribution and logistics sectors including the previously mentioned demand across the West Midlands for strategic, logistics hubs.

We need to better understand the needs of the Research and Development sector and any newly emerging sectors.

We also need to consider whether our tourism policy needs updating.

Finally we are considering whether our policy of accessibility to employment opportunities still remains up to date.

Housing

In addition to how much growth we need, we need to consider whether we need to make any further allocations or whether we could increase the density of development in some areas to help us accommodate our growth needs in line with the national 'brownfield first' policy approach.

We are also asking if anyone has any sites they would wish to have considered to help us meet Coventry's growth needs.

We are also considering introducing new standards for housing, including new building standards to help us address climate change, standards on amenity, and

minimum size standards for dwellings in line with the Government's optional [Nationally Described Space Standards](#).

We are also considering how the plan can better support a range of new and emerging models of housing in appropriate locations, including Build to Rent purpose build housing that is 100% rented out), Co-Living (newly emerging type of accommodation with shared communal space, generally built specifically for that purpose), Custom and Self Build Housing (where individuals or groups of individuals build homes for their own occupation), and Community Led Housing (where a local community group or organisation owns, manages or stewards the homes in a manner of their choosing).

We need to update the plan to ensure that it addresses local housing need in line with Government policy and local evidence. We need to deliver a range of market and affordable products. We also need to ensure that the plan supports the positive management of our existing housing stock including how it can be adapted for better energy efficiency.

In terms of [Affordable Housing](#) (as defined by Government), policy needs updating in line with national policy but also to ensure that it addresses local need in line with the most up to date evidence including the need for social rent, and ensuring that products remain genuinely affordable.

We need to update the Gypsy and Traveller accommodation policy to reflect the latest need as defined in our latest Gypsy and Traveller Accommodation Assessment and we propose some updated criteria for assessing planning applications.

We believe we need to update the policy on Care Homes, Supported housing, Nursing Homes and older Persons Accommodation including whether we should introduce new standards and locational requirements.

In terms of residential density, our policies currently set different standards for housing outside of the ring road and those inside the ring road where a much higher level of density is applied. In order to maximise the best use of brownfield land we consider whether densities could be increased in other locations.

In relation to student accommodation, we consider how we should balance this with the range of other housing needs of the city with the growth ambitions of the universities. We also review locational issues and ask whether we should introduce standards for student accommodation to ensure it is well designed, genuinely affordable, inclusive and sustainable.

In terms of the Homes in Multiple Occupation policy we are suggesting that this may not be needed as we are producing a separate set of policies on HMOs through a new Development Plan Document.

Retail and Centres

Many changes have taken place within the retailing sector since the adoption of the Local Plan 2017. There is now an opportunity to revise outdated retailing policies to reflect recent changes in this sector. National policy now allows much more flexibility, whereby town centre uses that would once previously have needed planning permission can now change to other uses without the need for a planning application. The aim of this was to make sure that town centres could adapt rapidly to changing economic and social circumstances. We need to make sure that our retail and town centres policies reflect national change, and consider how we review our network of centres across Coventry (City centre, major centres, district centres and local centres) to see if they still fulfil that purpose. We also need to review how we deal with proposals for town centre uses (such as retail, leisure, offices, and hotels for example) which fall outside of these boundaries, so that we are not undermining the function of our centres.

We are considering ways to update our hot food takeaway policy to make sure it complies with national policy, and which states an exclusion zone around schools (5 minutes walk time – approximately 400m).

We are also seeking ways to protect smaller shopping parades including a possible new policy which emphasises the need to consider their importance to the local community.

Communities

We are considering whether our policies on communities need strengthening. We suggest that the definition of 'community premises' might need broadening in a way that reflects the needs of a particular community especially in terms of being able to access local services and facilities without the need for a car.

We are also suggesting that educational facilities should only be redeveloped if they are genuinely no longer needed.

We also propose that Assets of Community Value should be a [material consideration](#) when dealing with planning applications (These include buildings and land etc which are important to a local community and which are then registered as such with the Local Authority so that the community can try and raise the finance to buy the asset if it is for sale, see <https://mycommunity.org.uk/what-are-assets-of-community-value-acv>).

We are also checking to see if people agree that our policy on [Neighbourhood Plans](#) only needs a minor update to bring it in line national policy wording. We have one 'made' (adopted) Neighbourhood Plan at Willenhall and two designated neighbourhood areas (Finham, designated in 2017 and Allesley, designated in 2016) which do not yet have Neighbourhood Plans.

Green Belt and Green Environment

We are suggesting that our adopted policy on Green Belt needs to be updated to reflect national policy wording, and that Local Green Space needs to be a separate policy as again it is treated separately in national policy.

Current policy requires us to review Land south of Westwood Heath Road, Land south of Bishop Ullathorne School, Playing Field South of Finham Park School and Land West of Finham Primary School. This was 'safeguarded' ie removed from the Green Belt to meet longer term development needs so we need to consider whether this remains likely to be needed and further work needs to be undertaken on this issue including discussions with neighbouring councils.

In terms of our policy on Green Infrastructure, we are proposing that this needs strengthening and updating as national policy, and local priorities on climate change have changed quite a bit. We are proposing to include more reference to health and climate change issues, the importance of trees, wildlife habitats and ecosystems. We also think the policy needs updating so it links to work being done in the wider region and to ensure that our green spaces link better together. We are also proposing a series of new standards for developments, and exploring the potential to introduce the [ANGST standards](#) (Natural England standards for Accessible Natural Green Space).

We also think our policy on biodiversity needs updating to reflect changes to national policy on Biodiversity Net Gain (so that developments result in an overall increase in biodiversity of at least 10%) and on emerging proposals for Local Nature Recovery Strategies (LNRS) where Coventry will be working with neighbouring Local Authorities including the West Midlands Combined Authority.

We are also proposing to make clear that policy also relates to 'blue' infrastructure, meaning a range of water bodies eg canals, rivers, ponds etc.

We are suggesting that the plan needs to strengthen tree protection policy as it is an important part of development proposals and general planning applications, we propose that it contains requirements for considering the type of tree, how it should be planted, and a range of other requirements including increased buffer distances to protect ancient woodland.

Design

We suggest that our current design policies are already positively written and flexible enough to be adaptable to a range of circumstances including economic trends. We think the policies could be strengthened to address the needs of an ageing population, to encourage developments to provide for a mix of generations, accommodation types and tenures as part of 'integrated neighbourhoods'.

We also propose that the policy is strengthened to recognise innovative architecture, the historic built environment and to address issues of health and wellbeing through introducing standards for open space, amenity and indoor space.

Heritage

It is proposed to update the heritage section of the Local Plan by including the recently adopted Brownshill Green and Earlsdon Conservation Areas. It is also proposed that the plan provides sufficient flexibility to be able to support new designations and review existing ones should these be needed.

We also propose to amend the policy to directly reference [Historic England Good Practice](#) guidance.

Archaeology

At present, archaeology is covered under heritage policy, but we suggest that it may merit a separate policy. This would provide more detail especially for areas where archaeology is especially important, and would reference good practice guidance from Historic England and standards from the [Chartered Institute for Archaeologists](#), as well as potential new and updated local evidence.

Accessibility / transport

We think that the transport and accessibility policies need updating to reflect national policy, the Council's recently adopted [Transport Strategy](#) and the emerging [climate change strategy](#).

We think that transport policy needs to reduce dependency upon the car, with more emphasis upon walking and cycling (including cycle hire), public transport including innovation such as the electric bus and the Very Light Rail rapid transit network as well as supporting other public transport types such as rail. We also need to consider how we encourage electric vehicles, and what we should do about parking standards and how we might review these. We also need to consider including reference in policy to Mobility Credits (vouchers which residents can use to pay for various forms of sustainable travel).

In terms of freight, policy needs to reflect Government strategy which plans to decarbonise the freight industry. Where new developments are proposed to operate for 24 hours a day it is proposed to require them to provide overnight facilities such as toilets and showers. It is also suggested that developments should demonstrate that they will use only main roads and not smaller residential roads. It is proposed that 'freight consolidation centres' could be supported in appropriate locations, where goods are then distributed via smaller vehicles, keeping large HGVs out of the city centre.

Environmental Management

We think that our policy on climate change needs revising to bring it up to date with international, national and local climate change strategy and policy. We need to set out how policy will help us achieve net zero carbon in all new developments and we think we need to include new standards for biodiversity as set out earlier in this summary. We also think we should be promoting the benefits of high density urban living with high quality design.

The Council will be developing an Adaptation and Resilience Plan for the city but we believe the [WMCA Climate Change Adaptation Plan](#) should be considered to address this issue and policy should reflect this.

The Council will also be seeking to encourage and support the development of net zero neighbourhoods and more liveable neighbourhoods designed in response to tackling the causes and consequences of climate change which could include community heat networks, provision for battery storage fed by renewable energy sources, infrastructure to support active travel modes, Electric Vehicle charging, green space, sustainable drainage, and trees to provide biodiversity, drainage and shade, alongside opportunities for community food growing. Policy needs to support this.

We currently have a policy (EM2, Building Standards) which we consider may need a total review to ensure that standards reflect the local context. Currently, our standards defer to the [Building Regulations](#) which aim to achieve zero CO2 emissions by 2050. The Building Regulations will change in 2025, bringing in the [Future Homes Standard](#). However the council wishes to set more ambitious targets and is considering what these might be and how these should be included in planning policy in a way which is realistic, viable and deliverable.

In terms of renewable energy generation we believe we need to ensure policy is updated so that it reflects national policy, supports suitable development and considers whether sites should be identified. We are also considering whether new developments should be required to include some level of renewable provision.

In relation to flood risk management including sustainable drainage systems and redevelopment of previously developed land, we think our existing policies need updating to bring them in line with the approach and direction set out in national policy and also the council's [Local Flood Risk Management Strategy](#) and [draft Climate Change Strategy](#). There is also a proposal to develop further guidance at a later stage through a Supplementary Planning Document.

In terms of air quality, we consider our current policy remains up to date as it links to our designated Air Quality Management Area however the policy could be strengthened to include reference to the [Ministerial Direction](#) for nitrogen dioxide, and also to refer to local supplementary policy.

We consider our waste management policy remains up to date There are no further plans from a waste management perspective to bring forward any sites for the

dedicated management of waste in the city. The Mixed Recycling Facility is being developed with an expected completion in summer 2023. The Council's wider Waste Strategy is still valid, and unlikely to be reviewed until the Government undertakes a review at a national level.

In terms of our minerals policies, we think these remain up to date as they accord with national policy and guidance.

Connectivity

Our current policies on broadband, mobile internet and telecommunications are considered up to date, however they duplicate national policy and may not, therefore be needed.

We need to update our policy on Developer Contributions to remove reference to the Community Infrastructure Levy (CIL) as Coventry City Council does not use this method, however we think we need to more generally refer to 'developer contributions' as the government is proposing to reform the system but clarity on recent consultations is awaited.

We also need to update the infrastructure delivery plan – this shows how development is supported by the right infrastructure

The Coventry City Centre Area Action Plan (AAP)

Given the changing nature of the city centre and changes in the wider structure of the economy and society across the region and country, and the increasing need to be adaptable, resilient and responsive to rapidly changing circumstances we are seeking views on the role of the AAP.

We are considering options for the best ways of planning for the city centre including whether the AAP remains fit for purpose or whether other mechanisms might be more appropriate, for example masterplans.

Call for Sites

In order to accommodate development over the plan period we need to consider a range of sites and whether they may, or may not, be suitable for a proposed use.

For anyone interested in having land considered we attach a form at Appendix 1 of the main consultation document.

For more information on the Local Plan Review, and to view our consultation webpage, scan the code below.



Agenda Item 5

Communities and Neighbourhoods Work Programme 2023-24

Last updated 8th September 2023

Please see page 2 onwards for background to items

13 July 2023
Review of the Implementation of the Homefinder Allocations Scheme Review of Additional Licensing Scheme
21st September 2023
Local Plan Review
26th October 2023 7th December 2023 8th February 2023 7th March 2023 2023/2024
Homes for Ukraine Scheme Update on Empty Properties Dog Fouling School Streets Resurfacing and pothole treatment Housing and Homelessness Waste Services Exempt Supported Accommodation Average Speed Camera Update Homefinder Review Additional Licensing Scheme Local Flooding and Water Quality Retrofitting Reducing Litter on our Streets – Community Initiative

Date	Title	Detail	Cabinet Member/ Lead Officer
13 July 2023	Review of the Implementation of the Homefinder Allocations Scheme	Requested at the meeting on 8 th December.	Cllr Welsh Jim Crawshaw
	Review of Additional Licensing Scheme	A review of the Additional Licensing scheme for the private rented sector	Adrian Chowns Cllr Welsh
21st September 2023	Local Plan Review		Cllr Welsh Chris Styles
26th October 2023			
7th December 2023			
8th February 2023			
7th March 2023			
2023/2024	Homes for Ukraine Scheme	To consider the situation with Ukrainian guests once the 12 month hosting arrangements are ending	Cllr Welsh Peter Barnett
	Update on Empty Properties	To provide an update on Empty Property Strategy as requested at the meeting on 9.02.23.	Cllr Welsh Davina Blackburn

Communities and Neighbourhoods Work Programme 2023-24

Date	Title	Detail	Cabinet Member/ Lead Officer
			Adrian Chowns
	Dog Fouling	To include in item on litter (Public suggestion)	Cllr AS Khan Craig Hickin
	School Streets	The Board requested a follow up item once the experimental traffic regulation orders had been in place and reviewed	Joel Logue Cllr Hetherton
	Resurfacing and pothole treatment	To look at the effectiveness of pothole repairs and resurfacing (Public suggestion)	Mark Adams Cllr Hetherton
	Housing and Homelessness	Update on services including Affordable House definitions and numbers; Number of properties purchased in Coventry through Right to Buy / Voluntary Right to Buy; Energy efficiency and running costs of modular buildings; Management of Anti-Social Behaviour; number of social housing properties	
	Waste Services		
	Exempt Supported Accommodation	To receive an update on progress and outcomes achieved through SHIP funding and any government consultation (SB4?)	Cllr Welsh Jim Crawshaw Adrian Chowns
	Average Speed Camera Update	Referred from SCRUCO 12 th July 2023	Cllr Hetherton Joel Logue
	Homefinder Review	A 6-months progress report including update on providing transparency to Homefinder applicants as to allocation wait times	J Crawshaw Cllr Welsh
	Additional Licensing Scheme	To receive the Cabinet Report with the conclusion of the review	Adrian Chowns Cllr AS Khan Cllr Welsh
	Local Flooding and Water Quality		
	Retrofitting		

Date	Title	Detail	Cabinet Member/ Lead Officer
	Reducing Litter on our Streets – Community Initiative	To include steps to address dog fouling	Cllr Hetherton Andrew Walster