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1. Introduction

1.1 The National Planning Policy Framework was issued in March 2012 and continued to require Local Authorities to produce a Strategic Housing Land Availability Assessment (SHLAA). In March 2014 the Government also published an update to its National Planning Practice Guidance, including an updated section on producing and developing SHLAA's. This draft version of Coventry City Council's SHLAA has regard to this new guidance.

2. Purpose and Context

2.1 The SHLAA is principally an evidence document which supports the new Coventry Local Development Plan (The Local Plan). Its principal aim is to identify sufficient sites within the local authority area that are capable of meeting the requirements identified for housing development over the plan period. It is important to clarify that the identification of a site within the document does not determine whether or not a site will be allocated for housing through the Local Plan, nor does it imply that the site will receive planning permission.

2.2 As suggested above, the purpose of the SHLAA is to consider the availability of land within a designated area that could contribute towards sustainable housing development. Once identified, this information can contribute towards the development of housing policy for the City. The main outputs from the SHLAA are to:

- provide evidence to support the development of new local planning policy;
- support the identification of a 5, 10 and 15 year supply of housing land;
- identify sites with potential for housing;
- assess the housing potential and capacity of sites by analysing their suitability, availability and achievability;
- assess when identified sites are likely to be developed;
- identify constraints to the delivery of identified sites and provide recommendations for overcoming these constraints; and
- consider the need for broad locations and / or windfall allowances.

2.3 In undertaking the assessment of sites the Council are required to involve other key parties who are able to input into the assessment and identification of deliverable sites. Prime examples include house builders, Registered Providers (RP's), local property agents and consultants, local communities and the Homes and Communities Agency (HCA). In recent years the Council have consulted on draft versions of its SHLAA and have received many representations from various stakeholders. These responses have helped inform this draft version of the SHLAA. In addition, comments and additional sites received in response to this draft document will help formulate the final version of the SHLAA that will support the next stage of the Local Plan.

3. Background

- 3.1 In response to national requirements the SHLAA has been developed over a number of years, incorporating numerous 'call for sites' exercises and consultation on draft reports. This has helped achieve the primary objective of compiling a comprehensive list of potential developable land across the City. Initial rounds of consultation culminated in the publication of previous SHLAA reports in March 2009 and July 2012, which supported the submission of previous draft Core Strategies. The land supply data from these reports has subsequently been updated through Annual Monitoring Reports (AMR), ensuring that the targets and supply figures are kept up to date.
- 3.2 Following the publication of the NPPF and the proposed removal of the regional planning tier, an opportunity has arisen to fully review the Councils SHLAA as well as the housing requirements against which it is considered. This has involved a reassessment of all identified sites as well as the assessment of new sites through focused consultation and partnership working with agents, land owners and consultants. As such, this new draft document is to be published in support of the new Local Plan public engagement paper, which focuses on delivering sustainable growth for Coventry.
- 3.3 Once complete the new SHLAA will supersede the previous versions published in 2009 and 2012 and inform the new Local Plan and City Centre Area Action Plan (AAP).
- 3.4 The new SHLAA assesses the level of supply against the requirement identified through the new Local Plan process. This has been informed by the Joint Strategic Housing Market Assessment for Coventry and Warwickshire (Joint SHMA) (2013) and it's supporting Annex (2014).
- 3.5 The Joint SHMA identified Coventry and Warwickshire as the strategic Housing Market Area (HMA), which means the 6 authorities need to work together to meet the housing needs of that area in the most appropriate and sustainable way. The Joint SHMA (2013) identified a housing need in Coventry of 23,600 homes set within the context of the HMA need of 76,000 homes between 2011 and 2031.
- 3.6 Following the release of the 2012 based sub-national population projections by the ONS (In June 2014), the Coventry and Warwickshire authorities commissioned independent consultants to provide an Annex to the Joint SHMA and consider whether its conclusions and recommendations remained appropriate.
- 3.7 The SHMA Annex identified an increase in the housing need of the HMA by just 4,000 homes over the plan period (meaning a total need of 80,000 homes), however of greater importance was the redistribution of that need across the six authorities. In particular, this

increased Coventry's need to 36,220 with significant reductions in housing need across the Warwickshire authorities.

- 3.8 Due to the progress being made with respective Local Plans in Warwickshire however it has been proposed that the distribution identified in the Joint SHMA operates as a starting point to managing housing need across the HMA. This would mean Coventry needs to plan for a minimum of 23,600 homes (between 2011 and 2031), where possible and sustainable within its own boundary. This is equivalent to 1,180 homes per annum.

4. Review Methodology

- 4.1 The new Planning Practice Guidance sets out an updated 5 stage methodology to ensure the assessment findings are justified and robust.

Stage 1: Site / broad location identification

- 4.2 The practice guidance recommends that the Council should explore the opportunity to undertake a joint SHLAA with other Local Authorities in their wider Housing Market Area. As part of the review process the possibility of this approach was explored, however neighbouring authorities are at varying stages of their Local Plan preparation meaning a collaborative assessment would be impractical at this time. It has not been ruled out however and forms a key part of the initial Duty to Cooperate agreement approved by the Coventry and Warwickshire Joint Committee in spring 2014 meaning this is to be considered further as part of subsequent plan reviews.
- 4.4 The table below identifies the types of data sources that are recommended for consideration by the practice guidance.

Table 1: Data Sources for Assessment

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning applications records Development briefs
Planning permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completions records
Planning applications that have been refused or withdrawn	Planning application records

Type of site	Potential data source
Land in the local authority's ownership	Local authority records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as County Councils, Central Government, National Health Service, Police, Fire Services, utilities providers, statutory undertakers
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes e.g. offices to residential)	Local authority empty property register English House Condition Survey National Land Use Database Commercial property databases (e.g. estate agents and property agents) Valuation Office database Active engagement with sector
Additional opportunities in established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector
Sites in rural locations	Local and neighbourhood plans Planning applications Ordnance Survey maps Aerial photography Site surveys
Large scale redevelopment and redesign of existing residential or economic areas	
Sites in and adjoining villages or rural settlements and rural exception sites	

Type of site	Potential data source
Potential urban extensions and new free standing settlements	

Source: <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/methodologystage-1-identification-of-sites-and-broad-locations-determine-assessment-area-and-site-size/>

- 4.5 Of these recommended sources two categories have been ruled out at this stage of the assessment. The first covers rural exception sites which, as alluded to in Paragraphs 54 and 55 of the NPPF relate specifically to housing provision within rural communities. As such, they do not apply to Coventry, and have been excluded from consideration. Secondly, opportunities for new free standing settlements are seriously constrained within Coventry due to the authority's tightly defined boundaries. In deed, no suitable area exists within the City boundary to accommodate an entirely new settlement. For this reason this example has also been discounted.
- 4.6 To supplement the desktop site identification a number of 'call for sites' consultation exercises have been held over the previous six years, with the most recent in autumn 2013. This helped provide further assurance that all potential sites were registered in the SHLAA database.
- 4.7 All sites that were recorded through this stage have been identified within a complete database and mapping system. This ensures that all sites are prepared for surveying and duplicate sites are removed.
- 4.8 Stage 1 of the updated guidance also clarifies that a site threshold of 0.25ha or 5 dwellings should be applied, although plan makers may wish to reduce this threshold where appropriate. Previous versions of Coventry's SHLAA have considered a minimum site threshold of 0.2ha and/or a capacity of 5 dwellings as they considered the assessment of sites smaller than this to be inappropriate and overly resource intensive. This is also reflective of the nature of these smaller sites within an urban context as they are often inclusive of conversions and infill opportunities which can not be pre-determined through the SHLAA process. After giving further consideration to this approach it was felt that it remained the most reasonable and appropriate course of action.
- 4.9 When reviewing the database it became apparent that all sites proposed through the SHLAA that were below the 0.2ha threshold, had originated through consultation exercises or had already been granted planning permission. No further sites were identified by the Council through alternative means for the reasons set out above. As such, a small selection of sites that were below the 0.2ha threshold were retained within the assessment. This approach was based solely on the location of the sites and their capability of accommodating a higher

density to deliver a capacity of 5 or more dwellings. These sites were often located within designated centres, areas of existing high density or close to key public transport nodes. They were also largely vacant and cleared sites that were readily available for development.

- 4.10 The initial stages of the assessment have also suggested that it would be more appropriate to consider those sites currently within the planning system as of April 1st 2014 (i.e. with an extant permission, under construction or allocated within the adopted development plan) separately to those sites which had been identified through alternative means. As sites within the planning system have already been considered suitable in principle for housing development their separation at this stage allowed greater focus to be given to the suitability of newly identified sites. This will be discussed further in later stages of this report.
- 4.11 As previously suggested the initial site assessment process was supported by the mapping of sites in GIS, which helped filter duplicate sites and refine the database. It also allowed cross referencing of sites with key transport corridors, designated centres and priority regeneration areas. It also allowed for the highlighting of potential development hotspots within Coventry. Through the mapping process and information review the SHLAA recorded 480 possible housing sites that were not already in the planning system. Through the course of developing the SHLAA, this total figure has varied from time to time as sites have moved in and out of the planning process. This is to be expected however when maintaining an up to date assessment of housing land availability.

Carrying out the Survey

- 4.12 Once all sites were recorded within the database they were assessed through an initial desk top survey and site visits in order to determine a number of issues. These included:
- Site size and boundary;
 - Current use;
 - Character of the surrounding area and natural characteristics;
 - Physical constraints, including: gradient, land contamination, proximity to air and/or noise polluting sources, location of utilities infrastructure, flood concerns, size and shape of site, mining legacy and presence of protected trees;
 - Highways and accessibility issues;
 - Proximity to services such as shops and public transport; and
 - Archaeological interests recorded through the Councils Historic Environment Record
- 4.15 The desktop survey built upon the information identified through the initial mapping process. This allowed different layers of information to be directly compared to the site boundaries inputted through the mapping exercise. Specific technical information was then acquired through input from other Council departments in order to supplement

the information contained in the GIS databases. A key example of this was contaminated land information relating to a selection of employment sites across the city.

- 4.16 The desktop review was also supported by additional evidence documents, with consideration being given to the Green Space Strategy and Green Belt Review documents (2007 - 2009). These documents identified a number of sites suitable for further consideration, but also flagged up the delicate city wide position of green space provision. Consultation with representatives of the PCT and Sport England has also highlighted the importance of retaining high quality open spaces, sports pitches and play areas throughout the city, in order to promote sporting involvement, support health improvements and decrease the levels of obesity across Coventry. Feedback from community groups has also highlighted the importance of green spaces to community cohesion, and how the existence of such spaces act as 'green lungs' for the city.
- 4.17 Through the desktop assessment 9 sites were discounted (C26, F26, He12, Ho5, L35, S7, Wy10, Wy11 and Wy15) due to irresolvable constraints such as the presence of a severe mining legacy or significant flood concerns. With regards site L35, the unsuitability of the land for residential development was highlighted by UK Coal and the British Geological Survey through consultation. The remaining sites were highlighted through GIS mapping as being entirely or predominantly situated within flood zones 2 and/or 3, without any reasonable opportunity of overcoming flooding concerns. It was decided that these sites would not be visited as they were already deemed unsuitable for housing development.

Stage 2: Identifying the Development Potential of Each Site / Broad Location

- 4.18 Stage 2 of the methodology outlines how the database of sites has been assessed in terms of their deliverability and/or developability and how site capacities of shortlisted sites have been calculated.

Developing Density Assumptions

- 4.19 As part of improving this aspect of the methodology the SHLAA has built upon consultation and stakeholder engagement and now applies a net density approach. Greater account has also been taken of site specific features as well as the incorporation of views and advice from the Council's urban design team.
- 4.20 Sites located within the existing urban area were initially considered against a site capacity matrix, which established the conversion of site areas from gross to net developable area. This site matrix utilised the density assessment work that has been undertaken by the Council to support the new Local Plan and this SHLAA review. Following the

assessment 95% of gross developable area was applied to apartment schemes and 85% to all other sites. On balance these were considered acceptable, and should allow for adequate provision of other site features such as open space and highways, whilst promoting an efficient use of land.

- 4.21 The net site areas were then assessed against a range of density levels ranging from 30 dwellings per hectare (dph) to 200dph. Despite the removal of the minimum density requirements in national guidance, 30dph was retained as a minimum site density as it is considered to represent the lowest level of land efficiency, especially within a compact urban area such as Coventry. Higher density assumptions were then made based on recent developments across different parts of the city, with the highest density being reflective of recent apartment schemes within and on the edge of the city centre. In all cases sites were considered on an individual basis, taking account of similar sized schemes within Coventry, surrounding density levels and site specific features. In the majority of cases a density of 30, 35, 45, 55 or 200dph was applied based on the findings of the density assessment. This differs from the assumptions made in the original SHLAA, but seeks to apply a more robust and justified approach to capacity projections. In terms of what this means for property types, the findings of the density assessment have been applied to provide broad assumptions (Table 2).

Table 2: Property Types by Density

Net Density	% of Houses	% of Apartments
30dph	100%	0%
35dph	95%	5%
45dph	70%	30%
55dph	55%	45%
200dph	0%	100%
site specific dph	Site Specific	

- 4.22 Where sites had previously been subject to planning applications that had either been refused (for non capacity reasons) or had expired these densities were retained where they were still considered suitable and achievable.
- 4.23 To support the broader density assumptions a selection of sites were discussed with the Council's urban design officers in order to develop potential schemes. In these cases the sites were either situated within a prominent gateway style location, were of significant size or had difficult, site specific features that would affect their capacity.
- 4.24 In addition to sites within the existing urban area a number of sites were assessed that currently sit within the Coventry Green Belt. Density assumptions on these sites were initially consistent to those of Greenfield sites within the existing urban area, with a 30dph assumption applied to 85% of the gross site area. As part of assessing

these sites however it was identified that there would be greater pressure on site infrastructure in order to support sustainable development. As such, the net-gross ratio was reduced to 80%. Further sensitivity analysis was applied to reflect a potential development industry approach. This offers more of a conservative reflection to density on these sites and is equivalent to 19dph on 100% of the site area. As part of the assessments both site capacities have been presented with sites offering a range of possible housing provision.

Assessing the Deliverability of Sites

4.25 The methodology requires all sites to be assessed for their deliverability or developability, in accordance with the definitions in Section 6 of the NPPF. This involves considering the suitability of the site for housing, the availability of the site for development and the achievability of housing provision, with a specific focus on viability. The results of this assessment then determine whether a site is considered deliverable, i.e. it can be developed within the first 5 years of the plan period, or developable, i.e. there is a reason that its development will be delayed until later years of the plan period (years 6 to 15). Sites that are considered developable are usually constrained, for example they are not readily available or may require some time consuming remediation. In more recent circumstances, due to the economic climate, sites proposed for higher densities especially, have become constrained in terms of their achievability as falling market demand for apartments has had a negative impact on development viability.

Assessing Suitability for Housing

4.26 Assessing the suitability of sites or broad locations for development should be guided by:

- the development plan, emerging plan policy and national policy;
- market and industry requirements in that housing market or functional economic market area.
- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

4.27 In undertaking this stage of the appraisal a balance must be reached between policy considerations and further site analysis. For example with regards Green Belt designations, some sites may be considered suitable if very special circumstances were to be demonstrated. In a situation where such circumstances are not demonstrated however then such sites would remain unsuitable and inappropriate for development. This must also be considered within the context of

meeting the Objectively Assessed Need for housing though, which in itself can constitute a need to amend Green Belt boundaries. This approach is consistent with the NPPF.

- 4.28 In addition any sites that impacted on Local Wildlife or Geological Sites have been considered unsuitable.

Assessing Availability for Housing

- 4.29 The vast majority of sites identified through the SHLAA have been put forward by either the land owner or developer with confirmation that they are either available now, or will become available at some point during the plan period. Where sites have been identified by the Council through site visits or desktop analysis, ownership details have been secured to allow an informed assessment to take place. In more general terms, when considering availability, consideration has been given to existing site occupation, dereliction and likely contamination or other site preparation issues.

Assessing Achievability for Housing

- 4.30 A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete the development over a certain period.
- 4.31 In line with time frames identified in the NPPF, the achievability of sites for housing has been considered within 1 of 4 time frames. These include
- The short term: Years 1 to 5 of the remaining plan period covering April 1st 2014 to March 31st 2019;
 - The medium term: Years 6-10 of the remaining plan period covering April 1st 2019 to March 31st 2024;
 - The long term: Years 11-15 of the remaining plan period covering April 1st 2024 to March 31st 2029; and
 - The final 2 years of the plan period: Years 16 and 17, which will cover April 1st 2029 to March 31st 2031.
- 4.32 In terms of site viability, this has been considered based on site knowledge, size, location, market activity and suitable residential types. For example sites that will comprise predominantly flatted developments are not considered to be deliverable under current market conditions, unless site specific information has suggested otherwise. This is because of lending restrictions and development viability associated with such developments. With regards former employment sites, consideration has also been given to the continuing delivery of new homes on similar sites across the city. Coventry's industrial heritage means that many employment sites will share similar remediation and abnormal costs. As such, the continued delivery of new dwellings on former employment sites suggests this land

continues to offer a viable and profitable development option within Coventry.

- 4.33 With regards delivery factors for larger sites in particular, consideration has been given to recent delivery patterns, as well as site specific details to project the likely build out rates of specific sites, and phases there of. At a time where the NPPF is promoting a significant increase in housing delivery however, there must be an acceptance that previous rates of house building will represent an absolute minimum in terms of delivery rates. Alongside the need for local authorities to identify additional land, there must also be an allowance for the development industry to develop more homes at a quicker rate to ensure housing needs are met at the rates projected. Without this approach then local authorities can identify all the land they wish, but housing need will not be met.
- 4.34 Further detailed analysis in terms of viability testing SHLAA sites will be undertaken as part of developing the Community Infrastructure Levy for Coventry. This additional information will be included within the final version of the SHLAA.

Overcoming Constraints

- 4.35 Practice guidance also requires attention to be given to identifying constraints and how they may be overcome in order to unlock development. As previously mentioned 9 sites were discounted through earlier assessment due to insurmountable constraints such as severe flood risk or mining legacy.
- 4.35 Other constraints identified through the site appraisals have included unsuitable access, minor flood risk, river culverts, existing occupants of alternative uses, need for site clearance, multiple ownership, historic landscape character and agricultural land classification. Where these constraints could not be overcome due to site specific issues or through reasonable investment in infrastructure¹, they have been discounted for the appropriate reasons (as highlighted in Appendix 3). Where manageable constraints have been identified they have been highlighted in the appropriate shortlisted sites pro-forma (See Appendix 1 and 2).
- 4.36 As suggested in Para 4.27, creating a balance between planning policy and site suitability has proved a key issue in developing the revised SHLAA for Coventry. Having regard to Para 14 of the NPPF it is clear that Green Belt policy and other site specific designations represent a constraint that can, in some circumstances, reasonably lead to sites being discounted in the SHLAA process.
- 4.37 This is primarily linked to the sites proximity to the existing urban area or the potential impact on openness and the purposes of Green Belt

¹ Being mindful of pressures on development viability

that could arise as a result of development. Appendix 2 therefore identifies a number of sites currently situated within the Green Belt that could be considered suitable for housing development, subject to the amendment of Green belt boundaries through the Local Plan process. It is important to stress however that these sites are identified on an initial basis at this stage, based on existing evidence available to the Council. This evidence includes:

- The 2007 and 2009 Green belt reviews
- Historic Landscape Character Assessments
- 2008 Environmental analysis
- Commentary and evidence from previous Core Strategy examinations , planning applications and site proposals

4.38 To support the final consideration of these sites the Council is commissioning a new Green Belt review jointly with its Warwickshire neighbours, which will consider all Green Belt land across Coventry and Warwickshire with a view to considering its appropriateness against the purposes of Green Belt set out in the NPPF. In addition the Council are also commissioning an update of its Green Belt environmental analysis, which will consider the biodiversity and ecological value of land currently identified within the Green Belt. The outcomes of these evidence studies alongside the feedback received to this version of the draft SHLAA will help finalise the city's housing land supply and list of deliverable / developable sites.

Considering Sites Already in the Planning System

4.39 As part of the wider assessment process all sites with a valid planning permission as of April 1st 2014 were analysed and considered. The assessment also included sites currently under construction and outstanding development plan allocations, totalling 178 sites. The progress being made on these sites and the likelihood of the existing permission being delivered formed a key aspect of the assessment. Such an appraisal is required by the practice guidance as planning permissions can be achieved for sites not owned by the applicant, hence bringing into question the availability of a site, or could be achieved for valuation purposes only, suggesting achievability and availability may be questioned. In terms of suitability however the granting of planning permission or identification of a site as a housing allocation is largely considered adequate justification that a site is suitable for residential development. In order to insure no site specific issues had changed since permission or allocation was approved however, this was reconsidered as part of each site appraisal.

4.40 An assessment of site availability and achievability has also been undertaken through site visits and desktop appraisals, giving the same consideration to the issues identified when analysing the SHLAA sites.

Stage 3: Determining the Housing Potential of Windfall Sites where Justified

- 4.41 The revised Practice Guidance for SHLAA's brings the allowance for windfall sites back to the forefront of housing land supply. The Practice Guidance suggests that such a provision can be included in the first 5 years where it can be justified but that in later years of the plan period such an allowance should be covered by broad locations.
- 4.42 Notwithstanding, as previously highlighted a threshold was applied to the site assessment process of 0.2ha and/or a 5 dwelling capacity, as the analysis of sites below this size was impractical and overly resource intensive. It is also reflective of the threshold identified in the Practice Guidance. Despite the use of the threshold, monitoring of past completion rates demonstrates a continued contribution of housing completions on smaller sites of less than 5 dwellings. It is therefore proposed that a windfall allowance is included within the SHLAA capacity to reflect expected contributions from these smaller sites.
- 4.43 In order to provide a robust basis from which to gauge a reasonable windfall allowance an assessment has been undertaken of all completions on small sites since 1991 (covering a 23 year period). An annualised average based on these figures has been used to develop a trend based approach over a considerable period of time. The majority of small site completions occur through the conversion of non-residential buildings into housing, the separation of houses into flats and the development of small infill plots (for 1 or 2 dwellings) situated within existing residential areas. In accordance with the NPPF however, previous completions on residential gardens have been discounted from the trend based projections. The Council therefore consider these to reflect genuine local circumstances and an additional robust and justified supply of housing land. Such a view was also supported by the Inspectors Report to the 2009 Core Strategy Submission Draft², which reached such a conclusion with less evidence than is available now.
- 4.44 Despite the commentary in Para 48 of the NPPF and subsequently within the Practice Guidance no allowance for windfalls is made within the 1st 5 year period. To include such an allowance would risk the double counting of small sites already with planning permission and would bring into question the robustness of the assessment.
- 4.45 No further allowance has been made for windfall contributions, despite some evidence relating to larger conversions and employment land churn. In turn no deduction has been made for the non-delivery of projected schemes or permissions as the two assumptions are considered to counter balance each other.

² more detailed evidence is now available as part of the Councils evidence base - Analysis of Small Site Windfall Developments in Coventry (1991-2014)

- 4.46 A detailed overview of the Councils approach to establishing a small site windfall allowance is available as part of the council's Annual Monitoring Report.

Stage 4: Assessment Review

- 4.47 Stage 4 requires the development of an indicative housing trajectory based upon the assessments in earlier stages. This sets out how much housing can be provided, and at what point in the future. It also allows a comparison to be made against the objectively assessed need for housing and highlights any need for further assessment of sites and/or a review of density assumptions. The indicative trajectory is set out in Appendix 5.
- 4.48 Through stage 2 of the assessment, 480 sites were analysed for their suitability, availability and achievability³. As previously highlighted 9 additional sites were discounted as part of earlier stages of the assessment due to insurmountable issues with flood risk and mining legacy.
- 4.49 Of the 480 sites, 312 were discounted for a variety of reasons. Of the sites discounted 207 were Greenfield Sites, with 45 of these constrained by their Green Belt designation. Reasons for discounting Greenfield sites included: an unacceptable loss of well used and maintained allotments or playing fields, inappropriate loss of incidental public open space that form integral parts of street scenes and urban setting and other additional issues such as flood risk, historic landscape character and access. With regards Green Belt sites, similar issues were apparent as were issues of openness and impact on the Meriden Gap. As previously discussed the policy designation was also of importance in discounting some of these particular sites.
- 4.50 The remaining 105 sites that were discounted included 16 on established employment sites, 12 on active social and/or community land, 67 would have resulted in an unacceptable or inappropriate loss of off street parking / garage facilities, and a further 10 were made up of sites that despite being largely vacant suffered from access or other site specific issue.
- 4.51 The remaining 168 sites have been assessed and shortlisted as deliverable or developable residential or mixed use opportunities⁴. These sites cover approximately 488ha of gross developable land area and contribute between 11,914 and 13,120 dwellings to the total land supply. The total varies depending on the density assumptions applied to sites currently within the Green Belt.

³ This does not include sites already in the planning system

⁴ 26 of the 168 shortlisted sites are identified as mixed use opportunities

- 4.52 A number of sites, both shortlisted and discounted were designated employment land within the existing urban area. All employment sites were assessed against the findings of the council's Employment Land Review (July 2012) to ensure the identification of such sites would not compromise the Council's ability to provide adequate employment land of high quality alongside land for housing. This is a fine balance and inevitably there will be an impact on the total amount of land identified for housing as some of that land will be identified as suitable for employment uses.
- 4.53 This is a fine balancing act, and has been highlighted in recent years by a trend in some land that had been identified as a possible housing opportunity being converted to or retained for employment generating activity. Prime examples have included the long term occupation of an employment site at Waterman Road, which had sat empty for some time prior to occupation and the development of 2 sites at Wickman's Drive, which had previously been promoted for up to 100 homes, but have now been developed for a care facility and industrial premises. In total, sites that had been considered for around 700 homes have subsequently been brought forward or retained for employment generating uses.
- 4.54 Existing employment sites that were discounted through the SHLAA assessment process included those that were of the best quality or situated within the most suitable and viable locations. Sites that were shortlisted were largely of poor quality and/or posed negative impacts on the wider environment. In such cases replacement residential provision and relocation of any existing uses could be beneficial to all concerned. Where sites were identified as being of poorer structural quality but of a higher locational standard, sites were identified as mixed use opportunities. This promotes the redevelopment of existing employment sites that incorporates a degree of enabling housing development to support new employment provision. In this instance an allowance has been made for a 50/50 split of the site between housing and employment provision. It should be stressed that this figure is used as a guide to allow for a potential housing capacity to be developed on site. Each site will be considered on its own merit when it progresses through the planning system and will, amongst other things, be dependant on site viability. In order to reduce risk and overcome occupancy constraints in particular, the Council will strive to work with landowners and employers to deliver the best possible schemes.

Comparing Housing Supply and Need

- 4.55 Having drawn together the site assessments from the previous stages of the SHLAA, Tables 3 and 4 highlight the total identified supply for all aspects of land supply in Coventry, having regard to both the higher density and lower density figures for the indicative Green Belt sites. This shows a total supply of between 22,117 and 23,329 dwellings

from identified sites, including between 11,914 and 13,120 that are not already within the planning system and that have been identified through the SHLAA process.

Table 3: Total Identified Supply from all components 2011-2031 (including higher density assumption for Indicative Green Belt sites)

	Years 1 - 5	Years 6 - 10	Years 11-15	Year 16+17	Total
	2014/15 - 2018/19	2019/20 - 2023/24	2024/25 - 2028/29	2029/30 - 2030/31	
Past Net Completions	-	-	-	-	2,998
Extant Permissions	3,831	951	477	0	5,259
Under Construction	857	0	0	0	857
SHLAA Sites	2,506	2,474	1,280	0	6,260
Indicative Green Belt SHLAA Options	0	2,860	2,860	1,144	6,864
Outstanding Allocations	570	40	85	0	695
Windfall Allowances	0	165	165	66	396
Total	7,764	6,490	4,867	1,210	23,329

Table 4: Total Identified Supply from all components 2011-2031 (including lower density assumption for Indicative Green Belt sites)

	Years 1 - 5	Years 6 - 10	Years 11-15	Year 16+17	Total
	2014/15 - 2018/19	2019/20 - 2023/24	2024/25 - 2028/29	2029/30 - 2030/31	
Past Net Completions	-	-	-	-	2,998
Extant Permissions	3,831	951	477	0	5,259
Under Construction	857	0	0	0	857
SHLAA Sites	2,506	2,474	1,280	0	6,260
Indicative Green Belt SHLAA Options	0	2,355	2,355	942	5,652
Outstanding Allocations	570	40	85	0	695
Windfall Allowances	0	165	165	66	396
Total	7,764	5,985	4,362	1,008	22,117

4.56 The objectively assessed need for housing in Coventry has been developed through a Joint Strategic Housing Market Assessment (SHMA) for the Coventry and Warwickshire Strategic Housing Market Area. This study was initially issued in November 2013 and identified a need for Coventry of 23,600 homes, set within the context of need

across the whole HMA of 76,000 homes between 2011 and 2031. As previously outlined, this study has formed the basis upon which at least 3 authorities within the HMA have developed Publication Drafts of their new Local Plan. There does appear to be a commitment to continuing with the distribution of housing need identified within this study, regardless of the latest ONS projections and what they suggest about a refocusing of housing need to the city (Joint SHMA Annex 2014). This approach would remain in keeping with what the NPPF states about meeting the needs of the HMA as a whole alongside meeting local needs.

- 4.57 With this in mind, Table 3 demonstrates a minimal shortfall against the objectively assessed need for housing of 271 dwellings, whilst Table 4 shows a slightly increased shortfall of 1,483 dwellings.
- 4.58 If this level of supply was to be considered against the higher level of need set out in the SHMA Annex (2014) of 36,220 homes between 2011 and 2031, then the shortfall would increase to 12,891 (relative to Table 3) or 14,103 (relative to Table 4)
- 4.59 Given the draft nature of this SHLAA document and the minimal nature of the shortfalls in Tables 3 and 4 relative to the objectively assessed need in the Joint SHMA (23,600), no further efforts are being made at this stage to make up this shortfall. This is also reflective of the detailed assessments already undertaken with a view to maximising supply options in Coventry. It is also reflective of the need to undertake additional evidence through the Joint Green Belt review and environmental analysis as well as on-going communications through the Duty to Cooperate.

Five Year Supply

- 4.60 Tables 5 identifies the housing supply identified for the next 5 year period against the equivalent housing requirement. This has regard to both recognised approaches to 5 year supply monitoring: The 'Liverpool' and 'Sedgefield' approaches. It also has regard to Para 47 of the NPPF and the need to consider a 5% and 20% buffer for flexibility purposes.

Table 5: Five Year Supply Assessment

Joint SHMA (2013) 2014-2019	Liverpool	Sedgefield
Total 5 Year Supply	7,764	7,764
Total 5 Year Requirement	6,081	6,442
Requirement Annualised	1,216	1,288
Number of Years Supply	6.38	6.03
Supply as a % of requirement	128%	121%

- 4.61 Table 5 clearly shows that the identified supply is sufficient to meet the 5 year supply requirement associated with the new Local Plan and the

objectively assessed need (based on the Joint SHMA (2013)). This has full regard to previous completion rates relative to requirements and considers future supply against a 5% and 20% buffer. As part of this assessment no allowance for development in the Green Belt has been included within the next 5 years of the plan period.

Stage 5: Final Evidence Base

4.62 Stage 5 of the methodology considers the need to ensure consistency, accessibility and transparency of data associated with the SHLAA. It sets out 5 standard outputs that are to be satisfied as part of the SHLAA assessment. The table below sets these out and demonstrates how the SHLAA has satisfied each output.

standard outputs	Output met:
a list of all sites or broad locations considered, cross-referenced to their locations on maps;	All sites considered through the SHLAA are listed in Appendices 1-3, with sites already in the planning system set out in Appendix 4. All sites shortlisted through the SHLAA are included in Appendix 1 and 2 with site plans for ease of reference.
an assessment of each site or broad location, in terms of its suitability for development, availability and achievability (including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when;	Appendix 4 includes discussion on site suitability, availability and achievability, including references to viability as part of the site assessment process. Additional work on site viability will be introduced to the SHLAA as part of the councils work on CIL. This will feed into the final version of the SHLAA.
contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;	Site Pro-forma's are included in Appendix 1 and 2 for sites which are shortlisted in the SHLAA. This provides greater detail for these sites relative to those that have been discounted. Appendix 3 sets out a list of discounted sites with reasons for them having been discounted.
the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable	Each shortlisted site is assigned a site density and capacity. In turn the density's reflect the type of housing likely to be delivered on

<p>estimate of build out rates, setting out how any barriers to delivery could be overcome and when;</p>	<p>site, having regard to viability. The SHMA identifies housing need issues and this will be reflected through the Local Plan. The SHLAA has been developed in a strategic sense with a view to offering a flexible and varied supply of land for housing in order to meet the city's housing needs.</p>
<p>an indicative trajectory of anticipated development and consideration of associated risks.</p>	<p>Appendix 5 includes an indicative housing trajectory. The principal risks associated with the delivery of housing are not considered to rest with the land supply angle as a flexible and varied supply of land is being promoted through the Local Plan. The principal risk is linked to macro-economic issues such as affordability, mortgage access and economic stability etc.</p>

5. Monitoring, Review and the Duty to Cooperate

- 5.1 The details of the Council's housing requirement is yet to be finalised and will be considered further as part of public engagement of the Local Plan. What is clear however is that it's a minimum of 23,600 dwellings between 2011 and 2031. It is also clear that the city's housing requirement will be reflective of housing plans and proposals across the 5 Warwickshire authorities and agreements through the Duty to Cooperate.
- 5.2 In this context the SHLAA will be closely monitored through the Councils Annual Monitoring Report to ensure continued progress is made against the requirements.
- 5.3 Having regard to the above, Coventry and Warwickshire have now established a sub-regional monitoring group to ensure every effort is made to align monitoring practices, especially those relating to the SHLAA and housing delivery. This will strive to share best practice and coordinate methodologies and site assessments to ensure consistent approaches across the 6 authorities.

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