



Report to Coventry City Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Coventry Local Plan 2011 - 2031

The Plan was submitted for examination on 1 April 2016

The examination hearings were held between July, October and November 2016 and January 2017

File Ref: PINS/U4610/429/6

Abbreviations used in this report

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
DCLG	Department for Communities and Local Government
DtC	Duty to Co-operate
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Coventry Local Plan provides an appropriate basis for the planning of the City provided that a number of main modifications (MMs) are made to it. Coventry City Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- To ensure that the levels of housing, employment, office and retail development to be provided over the Plan period are accurately identified and that the means to deliver the required development is clear;
- To ensure that the delivery housing trajectory is up-to-date and that the basis of the calculation of the 5 year housing land supply position is set out clearly;
- To ensure that there are adequate arrangements to secure the provision of housing and employment elsewhere in the West Midlands HMA to meet the shortfall of provision in Coventry;
- To provide new policies for each of the strategic sites to include infrastructure requirements and master planning principles;
- To provide sites to meet the identified needs of Gypsy and Travellers;
- To identify accurately the necessary transport and other infrastructure improvements; and the mechanisms for securing developer contributions towards them;
- To provide more clarity on the timing and phasing of infrastructure for the strategic sites by including categories of infrastructure in the policies and more detail in the Infrastructure Delivery Plan;
- To ensure that the retail requirements are set out accurately and that the position of defined centres in the hierarchy are consistent with the evidence;
- To ensure that the Plan's development management and site allocation policies are justified, effective and consistent with national policy;
- To ensure that there are effective policies to deal with flood risk, drainage, minerals and waste;
- To ensure that there are effective policies to protect the historic environment, Green Belt, open space and local green spaces;
- To ensure that the Plan's policy requirements take adequate account of viability considerations;
- To ensure that the policies provide a sound monitoring framework for the Plan.

Introduction

1. This report contains my assessment of the Coventry Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Coventry Local Plan 2011 - 2031 submitted in April 2016 is the basis for my examination. It is the same document as was published for consultation in September 2014.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc. and are set out in full in the Appendix (referred to as MOD1, MOD2 etc.).
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Local Plan publication draft 2016 – Policies map as set out in LP6.
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. There are also a number of cartographical errors to correct. These further changes to the policies map were published for consultation alongside the MMs¹.
7. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted

¹ Examination Document MOD.3

policies map to include all the changes proposed in examination document MOD.3 and the further changes published alongside the MMs.

Consultation

8. The Council carried out widespread public consultation over a six-week period, both on the Plan before its submission and on the proposed main modifications. I have taken account of all the responses to those consultations in preparing this report. The Council contacted everyone on their extensive consultation database. Notices were also placed in local newspapers, local libraries and community venues and on the Council's website. Officers held open evenings and exhibitions and attended Parish Council meetings and other local meetings on request.
9. A very large number of representations were received at both stages of consultation, from local residents and businesses, community organisations, neighbouring local authorities, statutory agencies, developers and others. In my view, the consultation process gave all those potentially affected by the Plan an adequate opportunity to express their views.
10. It was asserted that certain evidence documents, including some of the reports on the transport modelling of the Green Belt allocations, were not made publicly available in time to inform pre-submission consultation on the Plan. However, all the relevant documents were made available to participants at the hearing sessions, including residents and representatives of community groups, and were the subject of thorough comment and discussion. It is most unlikely that any additional points would have been made, had the documents been available sooner. I am satisfied therefore that consultation on the Plan was not compromised by a lack of information.
11. Taking all these points into account, I find that satisfactory consultation was carried out on the Plan. The consultations met all the relevant legal requirements, including compliance with the Council's *Statement of Community Involvement*².

Assessment of Duty to Co-operate

12. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
13. The Council's Duty to Co-operate Topic Paper³ describes the joint working and activities it has undertaken with other bodies. This includes co-operating with the other 5 local authorities in the Housing Market Area (HMA), namely Warwickshire County Council (WCC), Nuneaton and Bedworth Borough Council (NBBC), North Warwickshire Borough Council (NWBC), Rugby Borough Council (RBC), Warwick District Council (WDC) and Stratford-on-Avon District Council (SDC). This is evidenced most notably by the joint working in respect of meeting housing needs. The Coventry and Warwickshire joint Strategic Housing Market Assessment (SHMA) has been endorsed by each of the local authorities.

² Statement of Community Involvement (July 2012) Examination Document LP15

³ Duty to Cooperate Topic Paper (March 2016) Examination Document LP23

14. A Memorandum of Understanding (MoU)⁴ on the level and distribution of housing across the HMA has also been signed by each of the local authorities apart from NBBC. This Council has committed to reviewing the extent of its land availability as part of an updated Strategic Housing Land Availability Assessment (SHLAA) and may sign the agreement at a later date. The MoU sets out the Objectively Assessed Need (OAN) for housing for each local authority within the HMA. The local authorities accept that Coventry City Council is unable to accommodate its full housing need within its own administrative boundary. As such, the MoU sets out the agreed distribution of the shortfall within Coventry to the other local authorities in the HMA. Each local authority signed up to the agreement is committed to ongoing co-operation and engagement in relation to the delivery of housing for the HMA. The MoU and joint SHLAA have been an important component of the assessment of the capacity of the City to accommodate new housing.
15. An agreed statement⁵ between Coventry City Council and NBBC was submitted to the examination. It acknowledges that whilst NBBC has not signed the MoU this does not signify a refusal to sign permanently but rather reflects that NBBC first seek to assess their housing land capacity. This would be undertaken as part of the process of updating their development plan and would allow the testing of meeting the unmet need from Coventry through evidence which would also be supported by Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) and public consultation. If this process demonstrated that the level of additional housing identified for delivery in NBBC cannot be met, then both parties would work jointly with the other Warwickshire authorities to review the MoU as appropriate. They both stressed an on-going commitment to working together and with neighbouring authorities to meet the development needs of the sub-region.
16. I deal below with the soundness issues in relation to identifying and meeting housing needs across the HMA. However, in terms of the duty to co-operate there is no specific requirement to have reached agreement on the distribution of housing provision across the HMA at the time of submission. It is the actions of the Council in working with other relevant authorities which is central to my consideration of the matter. The Council has participated in joint working in respect of the evidence base for assessing housing needs – both in the context of the SHMA involving all Warwickshire Councils and the updated evidence base. The Council has demonstrated a history of constructive and effective co-operation and joint working with other authorities in the HMA in relation to strategic housing and employment matters. Coordination has also taken place with the other local authorities in a wide range of matters that are described in more detail in the above-noted background paper.
17. There has been ongoing cooperation with other statutory bodies most notably Highways England, the West Midlands Integrated Transport Authority and the Environment Agency, the last named of which has resulted in the preparation of a statement of common ground in respect of the Coventry LP examination. Coventry is a member of the Coventry and Warwickshire Local Enterprise Partnership (CWLEP). The CWLEP area coincides with the HMA. It led the sub-

⁴ MOU relating to the planned distribution of housing: Examination Document LP10

⁵ LP176

regional assessment of employment land availability and was active in identifying and assessing the availability of major employment sites within the sub-region. The outputs of this work have informed the Local Plan.

18. Taking these matters together and within the specific context which applies in this case, I am satisfied that the Council engaged constructively, actively and on an on-going basis in terms of overall housing provision and other strategic matters. I conclude therefore that the Council has complied with the duty to co-operate.

Assessment of Soundness

Main Issues

19. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified 10 main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Does the Local Plan appropriately identify housing needs and does it set out effective measures to meet them in accordance with national planning policy?

Objective Assessment of Housing Needs

20. The National Planning Policy Framework (NPPF) says that Local Plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the NPPF's policies.⁶ The first step in the process is to identify the full, objectively assessed housing needs.
21. The joint Coventry and Warwickshire (C&W) SHMA was produced on behalf of the Council and its neighbouring authorities in 2013⁷. This was subsequently updated in 2014⁸ and 2015⁹. The C&W joint SHMA identified the Coventry and Warwickshire area as an appropriate housing market area (HMA). The HMA is justified in the C&W joint SHMA report and supported by a national research study by the Centre for Urban and Regional Development Studies which includes parts of all of the Warwickshire authorities as within a Coventry-focussed HMA. Furthermore it is consistent with evidence underpinning the definition of the CWLEP.
22. The starting point for the assessment of housing need was based on the Department of Communities and Local Government (DCLG) household projections, in line with the Planning Practice Guidance (PPG). In 2013 these were based on the 2011-based 'interim' household projections and predicted an annual increase in households of 4,066 per annum across the HMA. The C&W joint SHMA was updated in 2014 to take account of the Sub National Population Projections (SNPP) published that year and to consider the potential

⁶ National Planning Policy Framework paragraph 47

⁷ C&W Joint SHMA 2013 (LP43)

⁸ C&W Joint SHMA 2014 Annex (LP44)

⁹ C&W Joint SHMA 2015 Update (LP45)

implications of different levels of employment growth on the level and distribution of housing provision in the HMA. In 2015 the C&W joint SHMA was updated to take account of the 2012-based DCLG household projections.

23. Each assessment of need has consistently taken account of demographic need, economic projections, market signals (including affordability) and household formulation rates and has been the subject of sensitivity analysis. Taking into account adjustments made to support economic growth and to improve affordability, the C&W joint SHMA 2015 Update identifies a full objectively assessed need (OAN) for housing in Coventry and Warwickshire of 85,440 homes over the Local Plan period of 2011 – 2031 (4,272 homes per annum). At the local authority level Coventry's full OAN over the Plan period is identified as 42,400 or 2,120 homes per annum.
24. Upon commencement of the first Hearings of the examination, the 2014-based ONS SNPP and DCLG 2014-based household projections were published. The PPG¹⁰ makes clear that housing assessments are not automatically rendered out of date every time new projections are issued. Nonetheless, the Council considered this latest available information to ensure that the local needs assessments were informed by the latest available information. The assessment¹¹ did not seek to revise the key assumptions in the C&W joint SHMA update 2015 but provided an update where the updated population and household projections potentially changed that part of the evidence base. It also considered the 2015 mid-year estimate (MYE) which was also published since the updated SHMA.
25. The findings identify an overall increase of the population of the HMA by 152,319 people over the plan period, representing an 18% increase. There is a predicted increase of approximately 18,800 people in Coventry but lower projected figures across the Warwickshire neighbouring authorities. Overall, the projected level of population growth across the HMA aligns with typical past trends when assessed over a range of trend periods, which reflects the findings of the C&W joint SHMA 2015 Update. The pattern of population growth is similar to that of the 2012-based SNPP. Whilst the projected level of international migration is higher overall, the components of population change differ across different parts of the HMA.
26. The sensitivity testing, which included a number of population projection scenarios, was based on the most up-to-date population data (the 2014-based SNPP and 2015 MYE). It also considered the likely level of population growth required to meet economic forecasts. Market signals and affordable housing were not reassessed in this latest study but I agree that the conclusions from the C&W joint SHMA 2015 Update are unlikely to have changed since September 2015. I return to this below.
27. The updated assessment identifies a very similar level of housing need across the HMA (4,237 homes per annum compared with 4,272 homes previously). Whilst there are differences for individual areas, the updated analysis does not point to any fundamental differences from the conclusions of the 2015 Update. When the more recently published data is taken into account, it is

¹⁰ Planning Practice Guidance (PPG) paragraph 016 Reference ID: 2a-016-20150227

¹¹ Coventry-Warwickshire HMA: 2014-based Subnational Population and Household Projections (August 2016) (LP231)

clear that the identified level of need across the HMA remains valid. Modifications (**MM18**, **MM19** and **MM47**) set this out clearly and are necessary to ensure that the Plan is justified and effective.

28. Alternative OAN calculations were submitted by representors¹² - suggesting that the OAN has been underestimated. Figures vary, with suggestions that the OAN should equate to around 5,000 dwellings per annum or higher to take account of demographic adjustments, household formation rates, market signals and economic growth.
29. The Council's assessment of overall housing need began by considering the most recent (2012-based) population and household projections published by ONS/DCLG in line with national planning policy guidance¹³. It then assessed key components within those projections - namely, migration trends and household formation rates. The 2015 Update also considered the 2013 and 2014 ONS mid-year population estimates. In terms of overall population growth, the analysis shows that the population growth rate in the HMA since 2000 has been broadly similar to that seen across England. The components of population change in Coventry, including migration trends have been taken into account and the analysis does not identify any conclusive evidence that would warrant making adjustments to the demographic projections. The data suggests that future growth is expected to be at a rate reflecting somewhere between short and long-term past trends.
30. Unattributable Population Change [UPC] is the term used by ONS for an unexplained difference between the MYEs that have been updated to take account of the 2011 Census, and the previous "rolled-forward" MYEs that predated the 2011 Census. For the 2011 MYEs, at the national level, UPC amounts to 103,700 - a small proportion of the total UK population. At the local level, however, UPC is distributed very unevenly with some local planning authorities experiencing "positive" and others "negative" UPC. The UPC figure for the HMA is "negative", which suggests that the components of change feeding into the SNP may have over-estimated migration and population growth or there was an error in the Census data.
31. The UPC is relatively modest when considered at the HMA level but has greater impact when considered for individual authorities, particularly Coventry. The Council thus undertook a sensitivity analysis to consider the potential impact of UPC on the projections. However, as set out in the 2015 Update, it is unclear if UPC is related to migration and could potentially be due to changes in the methods used by ONS to measure migration. As such, it is likely that any errors would be focussed on earlier periods and so a UPC adjustment for more recent data would not be appropriate. It is thus not a robust alternative to the SNPP which shows a level of population growth for the HMA which is consistent with short-term past trends. This suggests that UPC is not having a significant impact on the future projections.
32. The 2015 Update considered longer-term 10 year migration trends as part of the sensitivity testing, as an alternative to the 5-year period used in the SNPP. The sensitivity testing showed a higher level of population growth in the HMA and Coventry in particular. At HMA level the analysis showed that

¹² Barton Willmore OAN Review Rep No 1049 dated 29 February 2016 (LP139)

¹³ Planning Practice Guidance Paragraph 015: Reference ID: 2a-015-20140306

population growth could vary from 14% (if UPC was attributed) to around 22% based on a linear projection of 10 year population trends. The 2012-based SNPP lies within the middle of this range at around 17%. The evidence thus tends to support the robustness of the SNPP. Moreover, projections linked to long-term migration trends are not considered to be a reliable alternative to the SNPP.

33. The 10 year linear migration projection shows that the analysis does not take account of the impact of a changing population structure (as the SNPP does). The variable projection is more robust at HMA level but at local planning authority level it is less so, as there are likely factors in the past which have influenced the distribution of growth across the HMA. The sensitivity testing broadly confirms the levels of population growth in the SNPP as a reasonable trend-based projection. It is therefore reasonable to assume that the 2012-based SNPP is a sound basis for identifying housing need. The 2012-based DCLG Household Projections have also been considered in some detail. These appear to be robust when considering age specific household formation rates.
34. In terms of economic growth, the C&W joint SHMA 2015 Update considers the latest economic forecasts from Experian and Cambridge Econometrics. These projections have been compared with historical employment growth. There was also detailed consideration of economic growth assumptions within individual authority employment land reviews.
35. The 2015 Update sets out how there can be issues with the data that each forecasting body uses – for example, jobs can be recorded from places where employees are paid from rather than where the job is located . The comparison between the two 2013 forecasts shows a particular difference between the employment growth expected to occur between 2011-13. It is difficult to provide accurate figures over this period given issues regarding how employment is recorded and the multiple data sources which need to be considered to model employment changes. The Council's evidence thus sought to consider changes across the HMA during this timeframe based on a range of data sources.
36. As explained in the 2015 Update, accurate data for changes between 2011 and 2014 is not essential for the purposes of assessing housing need as demographic data is available up to 2014 and projections were run from 2014 onwards. Consideration was also given to local economic growth dynamics and potential, the influence of past supply/constraints on past performance and the potential influence of policy on future growth potential. Furthermore, in the most recent update, the number of dwellings has been increased to support economic growth. However, these do not impact upon the HMA-wide housing requirement as the overall need linked to economic growth is lower than the demographic need.
37. Economic growth can thus be supported through altering the spatial distribution of housing provision between the neighbouring authorities, in line with the advice in the PPG¹⁴. I consider the Council's assessment to be robust in terms of providing a demand-based assessment of economic growth

¹⁴ Planning Practice Guidance Paragraph 018 Reference ID: 2a-018-20140306

potential for the HMA and individual authorities that takes account of the structure and growth potential of the economy in different areas.

38. Market signals were considered in the 2013 SHMA and revisited in the 2015 Update. House prices, affordability and overcrowding were all taken into account. The 2013 SHMA found that market conditions have changed dramatically since 2007/8 with falling prices and improving affordability. An update to the assessment showed an improvement in market conditions over 2013/14 and associated increases in house prices. However, the SHMA identified that whilst house prices grew over the pre-recession decade, since 2007 in real terms the value of housing has fallen in all areas. Coventry is shown as the most affordable area within the HMA with an affordability ratio of 4.7 which is below national averages. House prices have fallen in real terms since 2008 and this has had a particular impact in Coventry which shows notable improvements in affordability since then.
39. Nonetheless, in the 2015 Update it was acknowledged that there had been a decline in household formation amongst the population aged 25-34. The reduction in the affordability of market housing and the economic recession over the latter part of the 2001-11 decade is likely to have contributed to a decline in household formation rates in younger people. However, the 2015 Update shows an improvement in the projected household formation rates of this age range when comparing the DCLG 2012-based projections to the 2011-based projections¹⁵. As outlined in the evidence, complex factors are at play such as real growth in disposable income, access to mortgage finance, interest rates and economic confidence which will all influence trends in household formation.
40. A scenario was thus developed whereby the headship rates for this age group were returned to levels in 2001. The same approach was taken in the recent analysis. The sensitivity analysis undertaken in 2015 indicated that an uplift of around 75 homes per annum across the HMA would support an improvement in affordability and household formation rates amongst younger households. Using the 2014-based SNPP and MYE projections, the latest update indicates that an uplift of 70 dwellings per annum is required across the HMA. I return to this below.
41. The 2013 joint SHMA identifies a high level of overcrowding in Coventry which is a reflection of the City's housing offer which is focussed more on terraced housing and flats as well as the high number of students. The Council thus seeks to combat this through delivery of a greater number of larger family homes and purpose built student accommodation through the provisions of the Plan.
42. It was suggested that the result of the EU Referendum and plans for Brexit will affect international migration to the UK and result in a reduced level of housing to be required over the Plan period. Also, that the ONS methodology for measuring migration is unreliable. However, the potential impact of Brexit on migration and future population projections is as yet unknown. National planning policy¹⁶ is clear that each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about

¹⁵ C&W Joint SHMA 2015 Update (LP45) Appendix A: Figure 1

¹⁶ NPPF paragraph 158

the economic, social and environmental characteristics and prospects of the area and that they should take full account of relevant market and economic signals. The Plan's housing requirement has been identified on the basis of the most up-to-date evidence and has been informed by the latest available information in line with planning policy guidance¹⁷.

43. It has been suggested that the level of housing need in Coventry has been over-estimated on account of inaccuracies in recording the number of students arriving and leaving the City. The Council looked specifically at whether student growth could have inflated the ONS 2012-based SNPP and household projections and whether out migration could have been underestimated. The evidence¹⁸ suggests that student numbers have been growing in Coventry with a notable increase in foreign students over the last 10 years. However, whilst some of the flow of international migrants to the City has been to study, the evidence shows that this does not have a particular impact on overall flows and that numbers of economic migrants are likely to be higher. Whilst there is a strong level of international migration of young persons, the highest inflows are of those aged 20-24 rather than 18-19 year olds. There is significant internal out migration from Coventry of those aged between 20-35 but particularly those aged 20-22. This suggests that some students who come to Coventry to study from abroad then move to other parts of the UK.
44. There is no clear evidence of an under-recording of out-migration of international students. The assessment acknowledges that it is difficult to definitively say whether the various data feeding into the SNPP serves to over or under-estimate international out migration. However, the evidence shows that international students are not a particularly substantial component of overall international migration to the City whilst the age-specific evidence of internal out migration suggests students move to Coventry but subsequently move elsewhere within the UK. Overall, predicted future population growth in Coventry does not look to be erroneous when compared to past trends. As outlined previously it sits somewhere between short and longer term trends.
45. Overall, the updated analysis of more up-to-date information shows that there is a very similar level of housing need across the HMA, i.e. 4,237 per annum compared to 4,272 previously. On the basis of the evidence and taking account of more recent published data, I consider that there are no overriding fundamental differences from the analysis and conclusions set out in the 2015 Update. This supports the robustness of the objectively assessed identified level of need set out in the Plan.

Assessing Affordable Housing Need

46. Coventry's full OAN over the Plan period is identified as 42,400 dwellings or 2,120 homes per annum. Of this total, there is a need for 12,000 affordable homes over the Plan period (equating to 600 per annum). Whilst the full OAN is unlikely to be met within Coventry's boundary, the Plan will seek to meet the identified need for market and affordable housing in partnership with the other HMA authorities. As such, the Council is taking a pro-rata approach to the delivery of affordable homes in terms of what can be delivered within the

¹⁷ PPG Paragraph 015 Reference ID: 2a-015-20140306 & 016 Reference ID: 2a-016-20150227

¹⁸ Note: Students & Housing Need in Coventry (September 2015) LP47

City. The Plan includes a requirement for 24,600 homes which equates to 58% of the OAN and a requirement for 6,960 affordable homes (348 per annum) which also equates to around 58% of the total need.

47. The PPG advises that total affordable housing need should be considered in the context of its likely delivery by market-led housing development. An increase in the Local Plan's total housing requirement should be considered where it could help to meet the need for affordable housing¹⁹. This is considered below under the section headed *Meeting Affordable Housing Need*.
48. In considering the balance between the affordable housing requirement and the supply, the assessment looked at whether levels of housing provision should be adjusted to improve affordability over the longer term. It was found that the deterioration in affordability of market housing over 2001 to 2011 is likely to have influenced a decline in household formation rates in younger people.
49. The link between the affordable housing need and the overall need for housing is complex. The affordable housing needs model includes needs arising from households who require a different size or tenure of accommodation, but whom by moving would not result in a net need for additional housing as they would release an existing property. Additional needs could arise only from concealed or homeless households. The impact of addressing those needs would be to increase household formation rates, particularly amongst younger households. The 2012-based Household Projections already assume increased household formation amongst younger households – and thus “build in” some improvements to affordability.
50. A sensitivity analysis was undertaken exploring a scenario whereby affordability and access to housing for younger households improves. As outlined previously, the analysis sought to quantify the implications of returning the household formation rates of the 25-34 age group back to 2001 levels (before the rate began to decrease) by 2031. Whilst there are complex factors at play and it is difficult to predict how these might influence household formation rates amongst younger households, as outlined above, the sensitivity analysis indicates that an uplift of around 75 homes per annum across the HMA would support an improvement in affordability and household formation rates. This level of uplift would be modest but would not be expected to generate any significant growth as it would be specifically targeted at improving household formation rates of 25-34 year olds within the existing population who may otherwise be living with parents or in temporary or shared accommodation.
51. The more up-to-date information indicates that an uplift of 70 dwellings per annum (or 2%) is required across the HMA. The 2014-based Household Projections already build in some improvements to the household formation rates of the 25-34 population in some areas and hence the 2% is an increase from an already uplifted position and thus results in an overall uplift of 4%. This uplift has been included within the Plan's affordable housing requirement.

Meeting the Objectively Assessed Housing Needs

¹⁹ PPG, 2a-029-20140306

Meeting the Overall Need for Housing – Capacity within Coventry

52. The Plan seeks to provide at least 24,600 new homes over the Plan period. The Council acknowledges that the Plan will not, on its own, deliver the full OAN for market and affordable housing in Coventry. In seeking to meet the OAN for housing, the Council's 'Strategic Housing Land Availability Assessment' (SHLAA), based on data for 2014/15 and published in January 2016²⁰, identifies capacity for around 25,000 homes. Subsequent to this, the Council has updated the figures to present the latest position as of 1 April 2016. This is shown in **MM46** and **MM48** and brings the total housing land supply to around 25,372 dwellings. This is comprised as follows - adding completions since 2011 (5,550) to sites with planning permission (5,900) and sites under construction (945) gives a total of 12,395 homes. Added to this, the SHLAA identifies sites capable of accommodating 3,058 dwellings.
53. The SHLAA used the joint methodology that was prepared by the 6 neighbouring authorities comprising the HMA. The process involved a robust assessment of 503 sites which were analysed for their suitability and deliverability. Some of these sites were discounted and some were incorporated into LP and City Centre Area Action Plan site allocations. The remaining 113 sites have been identified as deliverable or developable residential or mixed use opportunities. They comprise approximately 67 ha of gross developable land and are anticipated to provide 3,058 dwellings. I am satisfied that the SHLAA methodology is sound, and that the position, as updated, provides an accurate account of the sites that are either deliverable within five years or developable in later years, in accordance with the NPPF.
54. The remaining components of the housing supply comprise LP site allocations (8,920 dwellings), City Centre Area Action Plan allocations (649 dwellings) and a small site windfall allowance of approximately 350 dwellings. The figure is based on sites comprising less than 5 dwellings. It is considered important to consider such a supply given the approach in the SHLAA to maximise supply within Coventry's administrative area and to reflect local circumstances which shows a continued contribution of housing completions on smaller sites of less than 5 dwellings. The calculation of the allowance excludes the development of residential gardens. Overall, I am satisfied that the windfall allowance is based on sound evidence and is realistic and achievable. Thus the figure of just over 25,000 dwellings represents a sound assessment of the overall housing land supply over the period of the Plan.

Meeting the Overall Need for Housing – Addressing the Shortfall

55. The identified housing land supply will clearly not meet the OAN for 42,400 dwellings. As referred to elsewhere in my report, the available evidence, most notably the Council's SHLAA process, indicates that the allocation of additional sites would not be achievable given the City's tight administrative boundaries and lack of developable options during the Plan period. In devising its strategy, the Council considered a range of options as set out in the SA/SEA Final Report²¹ including the impacts of attempting to deliver all of its growth

²⁰ Examination Document LP53

²¹ Sustainability Appraisal/Strategic Environmental Assessment Report (January 2016): Examination Document LP8

within its own administrative boundaries. These options were discussed with the neighbouring HMA authorities.

56. Meeting all of the growth within Coventry would remove the Meriden Gap as far as it relates to Coventry's boundary and erode sensitive landscapes and areas of historic significance as well as potentially leading to a high degree of uncontrolled growth and urban sprawl. There would be significant infrastructure investment implications associated with meeting the total level of growth anticipated – not least to overcome significant constraints associated with flooding and environmental designations such as SSSIs, LNRs and ancient woodlands.
57. Other options to increase the supply of housing were considered via the SHLAA process including identifying additional sites, increasing density on allocated and SHLAA sites and increasing the windfall allowance. Additional sites were discounted for a number of reasons, including those outlined above. The Council's review of density across Coventry since 1991²² has helped to inform density assumptions made in terms of site capacity through the SHLAA process. Increasing density assumptions would reduce the opportunity to diversify the housing stock, particularly increasing the number of larger, family homes which are required. Furthermore, the windfall allowance is based on realistic assumptions about viability and delivery. To place a higher reliance on this source would reduce certainty – particularly in respect of infrastructure planning.
58. Policies DS1 and H1 make provision for 24,600 homes but Policy DS2 and the reasoned justification says that the Council will work with its neighbouring authorities within its HMA to support delivery of the development needs that originate from the City. In the case of Coventry, it is anticipated that the full OAN will be met and positively planned for in partnership with the 5 neighbouring authorities within the HMA. This is set out in the Plan and the Coventry and Warwickshire Housing Requirements MOU²³.
59. The MOU sets out the level and proposed distribution of housing within each local authority area across the HMA. This was based on the SHMA which is supported by a shared evidence base designed to ensure that the anticipated scale of housing growth would be distributed appropriately across the HMA. It is founded on realistic assumptions about the availability, suitability and viability of land to meet that need in accordance with the NPPF²⁴. Some representors have suggested that the agreed level and apportionment of the housing for each of the HMA authorities should be included within the Plan. However, I do not consider it necessary and it would be beyond my remit, in examining this Plan. That would be a matter for the examinations of the plans for those particular areas.
60. The MOU was signed by all authorities apart from NBBC who, at that time, were continuing to review the extent of its land availability with a view to potentially signing it at a later date. It is acknowledged within the MOU that NBBC's review of housing land will determine the need for any subsequent amendment to it. This is clear evidence of effective co-operation between

²² Assessing Density Trends in Coventry (December 2015): Examination document LP50

²³ Examination Document LP10

²⁴ NPPF paragraph 159

LPAs with the aim of meeting the housing needs of Coventry and the HMA as a whole. The housing provision in NBBC and the other HMA authorities will be monitored and any necessary Plan review will be undertaken if the necessary development isn't delivered as anticipated.

61. There is a clear expectation that LPAs will co-operate in allocating land to meet a shortfall in a neighbouring area. Policy DS1 of the LP sets out the full scale of the OAN for housing and makes clear that Coventry must continue to work with neighbouring LPAs through the Duty to Co-operate to ensure that appropriate provision is made elsewhere within the HMA. In respect of the implications for this examination, the MOU includes a figure of 14,060 dwellings to be delivered in NBBC. This figure includes the untested OAN for NBBC plus additional dwellings to help meet Coventry's shortfall. The housing figure in NBBC's draft plan is between 12,370 and 13,374 homes, depending on whether the 1,004 house difference is an allowance for contingency within the supply²⁵.
62. The difference between the NBBC draft plan housing figures and the MOU figure is relatively small when considered in the context of the wider HMA. It may be possible to make up this shortfall if more dwellings were delivered across the HMA as a whole. To this end, Coventry City Council points to sub-regional monitoring which suggests that the supply of housing (over 90,000 homes) is slightly above the identified need in the HMA (88,160 between 2011 and 2031)²⁶. This is based on assumptions at this stage that Plans will be adopted as proposed without further changes to site allocations or capacities. The statement of common ground²⁷ between Coventry CC and NBBC submitted to the examination says that joint work will be ongoing to produce an agreed schedule of amendments to NBBC's draft plan to reflect any additional capacity that may be identified within the Borough. Adoption of Coventry's LP will provide certainty in respect of the scale of the shortfall and the requirement for it to be met elsewhere in the Coventry and Warwickshire HMA.
63. Amendments to Policy DS1 (**MM18**) and its supporting text (**MM20, MM25, MM27** and **MM28**) express the housing requirement for Coventry as a minimum in line with Policy H2 and introduce a mechanism to review the Plan and address any shortfall in the event that the wider housing and employment needs of the HMA are not being met. The Council will monitor housing delivery in the City and in other LPA areas across the HMA to ensure it meets the shortfall. This mechanism would ensure that provision is made for Coventry's needs over the Plan period. Should sufficient housing not be brought forward within Coventry or the wider HMA there is a policy requirement for a full or partial review of the Plan to be undertaken. These proposed modifications are necessary to ensure that the LP is effective.

Meeting the Affordable Housing Need

64. As outlined above, there is an identified need for 12,000 additional affordable homes in Coventry between 2011- 2031. The Council has taken a pro-rata approach to identifying the level of affordable housing it will seek to deliver within its administrative boundary. Coventry's identified capacity figure of

²⁵ Coventry City Council response to NBBC draft plan – Examination Document MM19

²⁶ Coventry City Council response to NBBC draft plan – Examination Document MM19

²⁷ Statement of Common Ground regarding CCC Proposed LP Modifications – MM24

24,600 homes equates to 58% of total need within the HMA. On a pro-rata basis this would equate to 6,960 affordable homes (348 per annum). This approach is supported by the neighbouring authorities within the HMA, and the majority of them have agreed to include higher proportions of affordable housing within their respective policies in order to maximise the potential to meet the needs of the HMA. LP Policy DS2 sets out a clear commitment to work jointly with the neighbouring authorities to deliver the wider affordable housing need.

65. Policy H6 seeks 25% of all dwellings to be affordable on new residential schemes of 25 dwellings or more or over 1 ha in size. The Affordable Housing Economic Viability Assessments (AHEVA)²⁸ made an appropriate allowance for S106 contributions and potential future Community Infrastructure Levy (CIL) contributions. It analysed a range of different types and size of development and assessed existing use values, factoring build standards and infrastructure contributions into a residual value appraisal model. An assessment of brownfield sites included an allowance for site preparation as well as a contingency margin. On the basis of the evidence, I consider that the proposed policy requirement for affordable housing is reasonable and is based on credible and robust evidence.
66. Policy H6 includes the flexibility to negotiate on a site by site basis. Proposed modification **MM63** to include specific reference to viability in the policy wording would ensure that this is clear. The AHEVA was updated and monitored to ensure that the evidence base underpinning it remains robust²⁹. There is evidence to show that since 2012 both build costs and property values have grown in the region of 20% whilst land values have remained broadly stable. There are also clear signs of an improving housing market and development viability. In addition, quarterly data on new build price changes published by DCLG reflect the conclusions reached in the updated AHEVA note.
67. The Council did assess whether reducing the threshold to, for example, 20 dwellings would make an impact. However, based on the SHLAA sites as well as one of the allocations, it was found that the uplift in delivery of affordable homes would be minimal (it would supply approximately 64 additional dwellings equating to 5% of the identified 1,500 affordable homes needed).
68. Registered housing providers operate in the interests of scale preferring to manage a higher number of properties on one site rather than a smaller number of properties on several sites. This is due to the cost benefits associated with the marketing and management of a higher number of properties. The site threshold of 25 dwellings would thus prove more cost effective for registered providers. The Council concluded that on balance this minimal contribution may potentially have a far greater impact on development viability and result in a reduced amount of homes delivered over the Plan period.
69. Furthermore, the affordable housing requirement proposed via Policy H6 is similar to that required under current policy provisions. The Council can demonstrate that affordable homes are being delivered under current policy

²⁸ Affordable Housing Economic Viability Assessment October 2012 (LP39)

²⁹ Affordable Housing Economic Viability Assessment Note May 2016 (LP131)

and point to evidence which shows that since 2012 there have been only 3 instances whereby the requirement was reduced for development where there were exceptional on-site costs which reduced the viability of providing affordable housing contributions. There is therefore a very good prospect that the affordable housing requirement for 6,960 dwellings within Coventry will be met over the Plan period.

70. The need for 12,000 additional affordable homes in Coventry over the Plan period represents approximately 28% of total housing growth. Given the capacity constraints in Coventry, the housing requirement cannot be raised to help meet more of the need for affordable housing, as suggested in the PPG. The Council acknowledges that it will have to undertake regular reviews of affordable housing delivery within the City and the wider HMA. **MM151**³⁰ amends the Plan's monitoring indicators accordingly.

The Housing Trajectory and the Five-Year Housing Land Supply

71. Policy H1, as submitted, set out a phased approach to the delivery of housing proposing to deliver 1,020 homes per annum in the first 5 years of the Plan period and 1,300 homes per annum thereafter. The Council produced an updated housing trajectory to reflect the small site windfall figure before the start of the hearings (Examination Document **MOD.2**). I consider this to be necessary to ensure that the Plan reflects the most up-to-date position and for housing delivery to be monitored effectively. The trajectory is broadly consistent with evidence from the SHLAA about the rate at which residential sites would come forward for development.
72. Policy H1 refers to the housing land requirement being phased to allow for the necessary step change to be managed in a sustainable way. It is acknowledged that this step change reflects the increase in deliverable land options which would be facilitated by adoption of the Plan. However, given that the identified housing need exceeds the proposed target, and that there is an immediate need for housing, a phased approach to the release of development land would not be justified. Furthermore, it would not be warranted on the basis of the longer lead-in time associated with bringing forward the strategic sites.
73. The annual provision rates in Policy H1 are not maximum figures and higher rates of provision would be permissible. It would thus be more accurate to describe this phasing as a stepped trajectory. **MM49** and **MM51** amend the policy wording and supporting text accordingly. The projected delivery of the housing land supply set out in Policy H1 would reflect the Council's updated housing trajectory.
74. The updated trajectory, together with Policy H1, as proposed to be modified as outlined above, will facilitate the quickest possible rate of housing delivery to help meet as much of the OAN as possible within Coventry's administrative area. It will thus be consistent with the NPPF's goal of boosting significantly the supply of housing. Proposed changes to the supporting text of Policy H1 would set out that the proportion of development of brownfield sites would be monitored with a view to encouraging brownfield development, though it

³⁰ Examination Document MOD.10

would be made clear that such monitoring data would not constitute a reason for refusing greenfield development (**MM53**).

75. The SHLAA identifies the housing supply for the next 5 year period against the equivalent housing requirement. This sets out both the 'Liverpool' and 'Sedgefield' approaches to 5 year supply monitoring. It has also considered the need for a buffer in line with the NPPF³¹. The SHLAA assessed a 5% and 20% buffer as well as the impact of a "phased" approach (better described as a stepped trajectory) as set out in Policy H1. It also assessed the 5 year housing supply assuming an "un-phased" (i.e. not stepped) approach.
76. Over the first 5 years of the Plan period, 2011 – 2015, the updated trajectory broadly reflects the amount of housing that has been completed. It is then predicted that there would be a step up in the annual rate, from 1,020 to around 1,300 up to 2031. This is to reflect improving housing market conditions and a predicted uplift in anticipated completions following adoption of the Plan and removal of the Green Belt policy constraint to development of the SUEs. An alternative method would have been to show the trajectory as a flat annual average of the overall housing requirement across the whole plan period. However, to adopt this approach would mean applying a retrospective requirement for the years 2011-2015 which would not accurately reflect the rate of delivery. Furthermore, the stepped trajectory reflects the actual pattern of need which is predicted to increase more rapidly after 2021.
77. The SHLAA demonstrates that a 5 year supply of housing will be available upon adoption of the Plan. It has taken into account previous completion rates against requirements. No allowance has been made for the release of land from the Green Belt within the first 5 years of the Plan. Turning first to the assessment of the "phased" approach (or stepped trajectory, as proposed), under the Liverpool assessment there would be a 6.05 years' supply and a 6.07 years' supply under the Sedgefield approach. The "un-phased" approach would see a 5.85 years' supply under the Liverpool assessment or 5.40 years' supply under the Sedgefield approach. Each of the scenarios can demonstrate that the supply is sufficient with either a 5% or 20% buffer apart from the "un-phased" requirement which would be just short of a 20% buffer.
78. The Council should set out clearly in the Plan on what basis the 5 year housing land supply is calculated including whether it adopts the Liverpool or Sedgefield approach and whether it can demonstrate that an appropriate buffer can be achieved, whether that be 5% or 20%. It is proposed, via **MM52**, to set this out in the supporting text to Policy H1. As I explained at the hearing, this would be necessary in the interests of clarity and to effectively monitor the 5 year housing land supply on an ongoing basis. The supplementary housing paper³² sets out an assessment of past delivery rates against a range of adopted and draft housing requirements from 1991 and 2015. Performance has been strong when measured against adopted plans' performance though weaker when assessed against draft requirements such as the Regional Spatial Strategy or older versions of the Core Strategy.

³¹ NPPF paragraph 47

³² Supplementary Housing Paper (2015): Examination document LP51

However, this has coincided with an increase in the City's housing needs and an economic recession.

79. Nonetheless, the Council has continued to maintain a 5 year land supply of housing throughout this time. The evidence shows that the delivery of new homes is increasing year on year in Coventry³³. There has been a step change in housing delivery since 2011 and a falling trend in demolitions since 2009. The trajectory shows that for the 4 years from 2011/12 to 2014/15 a total of 4,114 dwellings have been delivered which would be in line with the 1,020 units per annum anticipated. It is assumed that 1,527 units would be delivered during 2015/16. However, the up-to-date position shows that since 2011, 5,550 dwellings (equating to an average of 1,110 dwellings per annum) have been completed, as of 1 April 2016 (**MM48** and **MM148**). This suggests that there is no shortfall in required housing delivery since the start of the plan period, when assessed against the stepped trajectory. Some minor changes are proposed which reflect updated site capacity figures taking into consideration permissions and phasing to-date but these do not fundamentally alter the numbers (**MM55**).
80. The Council suggest that the Sedgefield method would be an appropriate basis by which to assess the 5 year housing land supply. The Sedgefield method is normally used whereby the shortfall of delivery in the first 5 years of the Plan would be recovered within the first 5 years after adoption of the Plan. When assessed against the stepped trajectory the evidence suggests that there would not be a shortfall in the first five years. However when assessed against an annualised requirement (1,640 dwellings per annum) there would be a shortfall of approximately 2,650 dwellings.
81. The delivery of 1,300 homes per annum as proposed under the stepped trajectory would make up this shortfall within the first 5 years of the adopted Plan. This approach would also be justified on the basis that housing delivery is dependent upon some large urban extensions that will require some lead-in time to ensure that critical infrastructure is in place in a timely manner. Furthermore, the anticipated lead-in and delivery rates for these large sites are supported by evidence from developers. Accordingly, I agree that the Sedgefield approach would be an appropriate basis upon which to assess the 5 year housing land supply.
82. The Council considers that a 5% buffer is required. I agree that this would be appropriate, on the basis that there has not been a record of persistent under-delivery of housing in Coventry. **MM52** is thus necessary to make clear the basis upon which the 5 year housing land supply is calculated.

Specific Policy Requirements for New Housing

83. Policies H3 and H4 set out requirements for new housing and Policy H8 relates to proposals for care homes and older persons' accommodation. A number of modifications are necessary to ensure that they are effective and consistent with national policy. Policy H3 requires that proposals for new housing should comply with a number of criteria, including that it should be located within prescribed distances from a list of public services and facilities including medical services, schools and bus-stops. The Housing Supplementary Paper

³³ Coventry City Council Examination Statement to Hearing Session 2: Housing Need

³⁴highlights that the majority of Coventry is already well served by those services listed in Policy H3. The policy seeks to ensure that any gaps in provision created by new development would be addressed through appropriate contributions from developers.

84. It was not the Council's intention that the wording of the policy would be overly prescriptive and criterion 7 (as submitted) says that contributions may be sought to address any deficiencies. However, to ensure that the policy is sufficiently clear and flexible, the Council seeks to change the wording by adding "wherever possible" to the requirement that "new development should be" within prescribed distances from the listed facilities and services (**MM57**). The supporting text would also be changed via **MM59 – MM61**. These changes would specify that transport and infrastructure must be considered from the outset. Also, that new homes should comply with access standards in terms of being within 400m to a bus stop. The changes would also refer to the need to facilitate improved bus connections where appropriate, to ensure that all sites have easy access to public transport and walking and cycling routes but that site specific circumstances would be considered on a case-by-case basis. The changes would also clarify that developer contributions would be sought where appropriate and where it would not have an unacceptable impact on scheme viability.
85. Policy H4 seeks to secure an appropriate mix of housing in accordance with the latest SHMA but acknowledges and lists circumstances whereby it might not be appropriate. Local planning authorities have the option to set additional technical requirements exceeding the minimum standards including an optional space standard. However, the PPG advises that they will need to gather evidence to determine whether there is a need for additional standards and justify setting appropriate policies in their local plans³⁵. To avoid inference that the Council would seek to influence the size of new dwellings through this policy and to aid clarity, I consider that the proposed modification to remove reference to house sizes (**MM62**) is necessary.
86. Furthermore, I consider that the Plan's provisions for inclusive design and accessible environments are consistent with the NPPF. In reaching this conclusion, I have had due regard to the equality impacts of the Plan in accordance with the Public Sector Equality Duty (PSED).
87. The supporting text to Policy H8 says that at least 10% of new homes within the SUEs at Keresley and Eastern Green should be provided to support extra care provision. However, there is no detailed evidence to justify this requirement and for this reason the Council says that it has not sought to embed the provision within the policy wording itself. This is something that would be better considered at the master planning stage and **MM67** would make this clear. The supporting text also refers to 'Lifetime homes standards'. However, as these standards no longer apply, it is proposed to remove this reference through **MM68**. I consider that these modifications to

³⁴ Supplementary Housing Paper (2015): Examination document LP51

³⁵ Planning Policy Guidance Paragraph: 002 Reference ID: 56-002-20160519

Policy H8 would be necessary for the policy to be effective and consistent with national policy guidance³⁶.

88. Proposed changes to the supporting text of Policy H10 would update the number of purpose built student accommodation bed spaces currently benefitting from extant permission (**MM69**). This would provide additional clarity in terms of the most up-to-date data. The inclusion of an additional criterion in Policy H11 is necessary to set out clearly that proposals for homes in multiple occupation would not be permitted where the amenity and living standards of future occupants would be materially harmed (**MM70**).

Conclusion on Issue 1

89. To conclude on Issue 1, I find that, subject to the necessary main modifications recommended in the interests of soundness, the Plan appropriately identifies housing needs and sets out effective measures to meet them in accordance with national policy. In reaching this conclusion, and in my conclusion on Issues 2 and 5, and in all other matters, I have had due regard to the equality impacts of the Plan in accordance with the Public Sector Equality Duty (PSED).

Issue 2 – Does the Local Plan make adequate and appropriate provision to meet the accommodation needs of gypsies, travellers and travelling show people?

90. The Planning Policy for Traveller Sites (August 2015) (PPTS) places requirements on Local Plans in respect of this matter. A robust evidence base should be prepared, including early and effective community engagement with both settled and traveller communities (PPTS policy A). Pitch targets should be set and a supply of sites identified (PPTS policy B).
91. The Council undertook a Gypsy and Traveller Accommodation Assessment (GTAA) in 2014. No substantive criticisms were raised in respect of either the methodology of the study or its conclusions. I have no reason to take a different view. The assessment identified two permanent sites in Coventry. The Council-owned site in Siskin Drive has only 4 pitches and these are occupied as the site is in need of refurbishment. The private owned site at Burbages Lane has all its 14 pitches occupied. The assessment identified a need for 34 permanent pitches over the next 5 years, though 5 of these related to the assumed needs of existing families currently living in bricks and mortar accommodation as well as assumptions linked to the Census data.
92. The Council maintains, having regard to the guidance in PPTS³⁷, that the 5 households identified as living in bricks and mortar accommodation have abandoned a nomadic way of life in favour of residing within traditional accommodation as opposed to mobile homes. In view of the available evidence and on the balance of probabilities I share this view. This would mean that there is an identified need for 29 pitches.
93. It is intended that 16 pitches will be provided at the Council-owned site once it is refurbished. These 16 pitches added to the 14 in private ownership would

³⁶ Planning Policy Guidance Paragraph: 001 Reference ID: 56-002-20150327

³⁷ Planning Policy for Traveller Sites (August 2015) Annex 1

provide a total of 30 permanent pitches. In terms of the longer term need, the assessment identified a requirement for 6 additional pitches to 2031. However, criteria-based Policy H7 would facilitate the delivery of new windfall sites for permanent pitches over the Plan period. This would also enable any needs arising from those families who have ceased to travel, but would still require caravan pitches, to be met. This will be kept under review by the Council. Changes proposed to the supporting text of Policy H7 via **MM66** would provide further clarity to the Council's approach to the land supply for Gypsy and Traveller sites.

94. In addition to permanent pitches the assessment identified a need for 6 temporary or transit pitches. There has been an increase of illegal encampments over the last two years with over 70% of all occurrences taking place in this time. The evidence thus suggests that the need for transit accommodation is infrequent, and may reflect a short term trend rather than a longer term requirement.
95. It may be possible for the Council to respond to short term transit requirements through the use of temporary stopping places as the monitoring of illegal encampments suggests such sites would only be required for a short time. Longer term, the Council will monitor whether the recent trend for more frequent illegal encampments continues. Should a formal transit site be required, the Council intends to manage this via Policy H7 which would allow for such sites to come forward and through its 'Supporting Housing Delivery Development Planning Document'.
96. The Council will also consider whether there is a need for a targeted review of the Plan in accordance with Policy DS1 and the Monitoring Framework (as proposed to be amended). This is reflected in revised wording of the supporting text to Policy H7 (**MM65**). These changes are necessary in order for the Plan to be effective, justified and consistent with national policy.

Conclusion on Issue 2

97. For these reasons, and subject to the changes recommended, I conclude that the Local Plan provides satisfactorily for the needs of Gypsies and Travellers, consistent with national policy.

Issue 3 – Whether the distribution of development within Coventry City Council is sufficiently justified and consistent with the local evidence base and national planning policy?

98. The SA³⁸ considered what would be an appropriate level of growth for Coventry as well as the strategic approaches to delivering planned growth over the Plan period. The Coventry and Warwickshire neighbouring authorities also undertook a joint informal SA³⁹ to consider the spatial and functional relationship between Coventry and its neighbours. It also assessed strategic options in relation to the distribution of development to meet the unmet need outside of Coventry's boundary. However, in terms of a more detailed assessment of the proposed distribution within each administrative area, it

³⁸ Sustainability Appraisal/Strategic Environmental Assessment Report (January 2016): Examination Document LP8

³⁹ MOU Appendix – Examination Document LP10

was agreed that it would be the responsibility of individual authorities through their own SA/SEA and plan making processes. Each local planning authority has a legal obligation to undertake a SA of the effects of their own plans and projects.

99. The SA of Coventry's LP considered all relevant and reasonable alternatives and pursued the most appropriate approach to delivering its strategic development needs. The appraisal of all reasonable alternative growth projections were also considered as part of the SA process. Initial analysis through the SHLAA pointed to approximately 17,000 new homes being capable of being delivered in the existing urban area, representing 80% on brownfield land. However, changes to Green Belt boundaries would be required to accommodate homes to meet Coventry's housing need. As outlined earlier in this report, it was identified that it would not be possible to provide all the required housing in Coventry without there being significant and unacceptable impacts on historic landscapes and the natural environment. It was shown that a proportion of development would need to be provided in the wider Warwickshire HMA area. Also, options to meet the development needs of Coventry more sustainably may exist adjacent to the City's boundary.
100. I am satisfied that the broad approach of seeking land to meet the growth needs of Coventry in the form of urban extensions to the existing built-up area is justified. Given that the built-up area is so tightly constrained, the decision to assess potential sites in neighbouring local authority areas – as well as within the City – is also justified. A robust assessment of suitable sites within Coventry has been carried out through the SHLAA process. A significant number of sites have been allocated for development within Coventry although, as set out above, these are not sufficient to meet Coventry's overall housing requirement.
101. For these reasons, the approach that has been taken fully accords with the spirit and intentions of the Duty to Co-operate, as described at the start of this report. Paragraph 179 of the Framework states that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. It adds that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. The broad approach of the Plan towards meeting the growth needs of Coventry accords with national policy in this regard.
102. The preferred approach was directly informed by the joint SHMA, the Coventry SHLAA and was fully tested by the SA/SEA process. The Habitat Regulations Assessment (HRA)⁴⁰ concluded that neither the Local Plan nor the AAP were considered to have any likely significant effects on any European Sites alone or in combination with their plans or projects. The proposed approach represents a sound basis to deliver Coventry's development needs. The spatial strategy strikes the appropriate balance between the 3 aspects of

⁴⁰ Habitat Regulations Assessment: Examination Document LP76

sustainable development as set out in the NPPF⁴¹. It focuses on continued urban regeneration and the sustainable growth of the City into greenfield and Green Belt locations. I deal with the issue of Green Belt elsewhere in my report. However, it is clear from the evidence that reasonable alternatives were considered and that the preferred strategy is the most sustainable.

103. The SHMA was the starting point for considerations relating to the apportionment of housing to be delivered in each authority across the HMA. Ongoing collaboration through the DtC group and Coventry and Warwickshire Joint Committee ensured that the full housing needs of the HMA were assessed. In addition, realistic assumptions about the availability, suitability and viability of land to meet that need were established, in accordance with the NPPF⁴².
104. To this end, the Council shared its housing land supply data with its neighbouring authorities, including the assessment matrix and density assumptions. It also collaborated with neighbouring authorities to agree its SHLAA procedure. In undertaking the assessments of sites through the SHLAA process the Council completely re-assessed sites in 2015 to take account of the Joint Coventry and Warwickshire SHLAA methodology⁴³. The methodology drew on a range of evidence about the Green Belt, ecology, the historic and natural environment, biodiversity, infrastructure and flood risk. This process ensured that strategic issues regarding the level and distribution of housing growth was supported by a shared and sound evidence base. It also ensured that decisions taken in respect of the suitability and viability of sites for development was supported by a rational process and were robust and justified.

Conclusion on Issue 3

105. For these reasons, I conclude that the Local Plan's proposed distribution of development is adequately justified, that the decision to accommodate some of the growth needs of Coventry within the wider HMA is appropriate and that the methodology of selecting sites, is robust and transparent.

Issue 4 – Does the Local Plan comply with national planning policy in its approach to the Green Belt? Are the allocations of Green Belt land including land for Sustainable Urban Extensions (SUEs) at Keresley and Eastern Green justified and deliverable? Are the allocated sites appropriate and deliverable? Should additional Green Belt or other allocations be made? Are the detailed requirements for the allocations clear and justified?

National Planning Policy and the LP Approach to Green Belt

106. Policy GB1 sets out the approach to Green Belt land including areas that would be removed from the Green Belt to accommodate development. NPPF paragraph 83 says that alterations to Green Belt boundaries should only be made in exceptional circumstances. The Plan sets out why it is considered that exceptional circumstances exist to justify the release of land from the

⁴¹ NPPF paragraphs 7 and 14

⁴² NPPF paragraphs 159 and 160

⁴³ SHLAA Joint Method Statement (May 2015) Examination Document: LP52

Green Belt. As outlined above, the evidence shows that significant growth is anticipated for the area. The City's tight administrative boundaries together with the shortage of available land and diminishing opportunities to develop brownfield sites means that there is a lack of reasonable and appropriate alternatives. There is a need to diversify the housing stock and to meet identified needs for market and affordable housing. Furthermore, there is a need to provide employment land to support planned economic growth.

107. Alternative approaches were considered including increasing density of development on brownfield land and locating development beyond the Green Belt outside of Coventry. However, increasing densities would not provide sufficient capacity to deliver the required housing at the accelerated pace required nor provide adequate opportunities to diversify the housing supply. The Coventry and Warwickshire Housing Requirements MOU highlights the importance of locating development either adjacent to the City's boundary or along key transport corridors to facilitate accessibility to the City. Seeking to deliver the growth beyond the Green Belt would lead to development located in areas detached from Coventry and increase unsustainable patterns of commuting. It would also have implications in terms of being able to meet the HMA's housing needs, in particular affordable housing.
108. Unless some of the Green Belt is released, a substantial level of new dwellings - amounting to nearly one third of the planned supply - would not be delivered. The scale of potentially unmet need in the City is exceptional. The selective release of parcels of Green Belt to provide in the region of an additional 7,000 dwellings would make a very substantial contribution towards meeting the shortfall. However, even with the release of the Green Belt and greenfield sites the Plan will leave a shortfall of nearly 18,000 dwellings that will need to be met elsewhere in the wider HMA. The DtC requires neighbouring authorities in the HMA to help meet the shortfall, in line with the MOU. It also requires that Coventry City Council should seek to maximise housing land provision within its own administrative boundary to meet the identified need. The release of Green Belt sites is necessary to do this. I deal with the issue of Green Belt release below. However, the Plan refers to factors that amount to "very special" circumstances. However, it should refer to "exceptional circumstances" (**MM89**) in order to be consistent with the wording of the NPPF.
109. Several representations were made in respect of the Inspector's report on the Core Strategy 2009 in respect of his findings on the proposed release of Green Belt land. I have considered the Inspector's conclusions on the soundness of allocation of land within the Green Belt in the Core Strategy. However, I find that the circumstances of the Plan before me for examination are very different. The evidence shows that an unprecedented level of growth is required – Coventry is the second fastest growing City in England outside of London⁴⁴. As outlined above, this growth cannot all be accommodated within Coventry's administrative boundary which has necessitated a review of Green Belt land as part of the commitment to maximising the amount of development that can be accommodated elsewhere as part of the Duty to Cooperate.

⁴⁴ C&W Joint SHMA 2015 Update (LP45)

110. I have considered the suggestion that the greenfield sites should be released later in the plan period, and only released once the brownfield sites have been developed. Whilst the reuse of previously-developed land is encouraged in the NPPF, such an approach would run contrary to the overwhelming evidence of shortage of other land in the city to provide for the levels of housing and employment development that are necessary. As already referred to elsewhere in this report in respect of phasing, given the significant lead-time required for building on these strategic sites, it would also jeopardise the contribution they are required to make towards meeting needs during the Plan period. As such, I do not consider that this would be a sound approach.
111. A number of reviews of the Green Belt have been undertaken, the most recent of which was undertaken in 2015⁴⁵. This was a comprehensive assessment of the 5 purposes of Green Belt as set out in the NPPF⁴⁶ which covered the entire Green Belt of Coventry and Warwickshire. As part of the overall assessment, the Council undertook a Green Belt Matrix Assessment⁴⁷ which comprised a number of studies to consider potential environmental effects together with historic environment and infrastructure implications. The SA/SEA was an integral part of that process. The Coventry and Warwickshire Green Belt study assessed each parcel of Green Belt land against the purposes of Green Belts as set out in the NPPF and applied scoring criteria as part of the jointly agreed methodology with the adjoining authorities in the HMA.
112. In response to concerns raised by participants at the examination hearing, the Council engaged LUC – who undertook the 2015 Joint Green Belt Review – to jointly clarify a few matters. In their statements LUC⁴⁸, together with the Council⁴⁹, confirmed that the parcel of Green Belt at Eastern Green (parcel c25), along with all the other parcels, had been measured from the edge of the urban area through the centre or edge of the parcel. In no circumstances had measurements been taken from the centre of the parcel. Also, whilst parcel c25 is in multiple land ownership, it had been measured consistently with how other parcels were measured. The Council confirmed that in fact, the vast majority of parcels are in multiple ownership, with only 3 of the 28 parcels in single ownership.
113. In respect of whether the assessment of historic character for parcel c25 has failed to consider the listed building at the Windmill Hotel, the Council point out that the Joint Green Belt Review makes no reference to listed buildings having an influence on Green Belt policy or the assessment process. As LUC have confirmed, historic towns were considered in the assessment. However, whilst many settlements have historic elements, one of the Green Belt purposes set out in the NPPF aims to 'preserve the setting and special character of historic towns'. It is thus only relevant to settlements of a certain size i.e. towns. In particular, towns that retain a historic character connected to surrounding landscape elements. I consider that this is a sound approach to the assessment.

Are the detailed requirements for the allocations clear and justified?

⁴⁵ Coventry and Warwickshire Green Belt Review 2015: Examination Document LP70

⁴⁶ NPPF paragraph 80

⁴⁷ Coventry Green Belt Matrix Assessment January 2015: Examination Document LP77

⁴⁸ LUC Green Belt Review Update Note (October 2016): Examination Document LP251a

⁴⁹ CCC response to Action Point 8.2: Examination Document LP251

114. The Council and developers of the Eastern Green and Keresley SUEs produced 'Statements of Common Ground' for the examination which set out proposed uses of the sites and broad agreement of capacity and in some cases general infrastructure requirements. It was agreed during the examination that including these details in the Plan itself, rather than in the supporting documentation would provide a greater level of clarity in respect of informing infrastructure and master planning requirements of each of the strategic sites and more certainty that they would be delivered as planned. These overarching frameworks would establish Masterplan principles and design concepts that would inform more detailed subsequent planning applications. As such, a new key policy for each of the strategic sites is proposed to be included in the Plan.
115. The Masterplan general principles for each of the large strategic sites and for major development would be set out in new Policy DS4 (Part A) **(MM31)**. Specific Master Plan principles for the Whitley employment hub and Keresley and Eastern Green SUEs would be set out in new Policy DS4 (Part B to Part D). In addition, the reasoned justification would set out how the new policies would provide an overarching framework setting out requirements relating to land use, densities, community facilities, transport, infrastructure, open spaces and phasing. This approach would retain a degree of flexibility as more details would be provided in future master plans. However, sufficient detail would be provided at the strategic stage to assist in bringing forward the sites.
116. The new policy would support the longer term delivery of the strategic allocations through identifying necessary infrastructure required for each phase of development and the likely timing of delivery **(MM16)**. This would be achieved through a cross-reference to the IDP which would be regularly updated and linked to the Plan's monitoring framework. These changes are considered necessary to ensure that sufficient policy detail is embedded within the Plan to enable all relevant factors which will influence the delivery of the strategic sites to be taken into consideration and to improve the Plan's clarity and certainty.
117. All major development proposals will be required to demonstrate that they would not have an unacceptable impact on health and wellbeing. The Council is preparing a Health Impact Assessment (HIA) Supplementary Planning Document (SPD). Proposed changes to the supporting text of Policy HW1 are necessary to clarify that the SPD will build upon the health impacts toolkit being developed by Birmingham City Council and is expected to be rolled out across neighbouring authorities within the HMA **(MM32 and MM33)**. Policy HW1 relates to major development proposals, and as such, further changes are also necessary in respect of the thresholds above which, HIAs would be required **(MM34)**. This is to ensure that the requirements of the policy would not be overly onerous in respect of development required to deliver the Plan's proposed objectives. The Plan makes clear that HIA can be undertaken as part of the wider SA/SEA or as stand-alone assessments. Also, that the extent of assessment undertaken will depend upon the scale and type of development proposed and will be considered on a case by case basis.

Impact of Planned Road Infrastructure on the Green Belt

118. It is anticipated that the proposed distributor road at Keresley would be entirely within the SUE and thus would not have any further impact on the Green Belt. The proposed grade separated junction at the A45 would require a small area of land north of the A45 to be developed. Removal of land from the Green Belt to accommodate it was considered but it lacked clear defensible boundaries. The utilisation of an at grade junction was also considered but was discounted on account of the likely impact it would have on traffic flows, noise and air quality. A grade separated junction was thought to be the most sustainable arrangement.
119. Appropriate planting would assist to assimilate the road into its surroundings and limit any impact on openness. Such details would be subject to a subsequent application in any event. Furthermore, the NPPF⁵⁰ identifies local transport infrastructure which can demonstrate a requirement for a Green Belt location to be "not inappropriate in a Green Belt". Given the importance of enabling appropriate access to the SUE the Council considers the completion of a grade separated junction to be local transport infrastructure which would demonstrate an essential requirement for a Green Belt location. Other items of infrastructure which would require a Green Belt location are set out in proposed changes to the Plan (**MM56**).
120. The issue of whether these items of infrastructure should be included in the Policies Map was considered at the hearing. However, I agree with the Council that at this stage the intended route is unknown and any identification on the Policies Map could only be indicative. Instead the broad principles would be included in the new policies DS4 and the IDP which would be further developed at the master planning stage.

The Green Belt Policy Approach

121. Policy GB1 relates to Green Belt and local green space, with the proposed changes to those boundaries identified on the Policies Map. Some changes are proposed via **MM92** to ensure that the policy is consistent with national planning policy. A cross-reference to the NPPF is also necessary (**MM93**). A new criterion within the policy (**MM90**) will also make clear that the erection of small ancillary buildings and structures would be permissible in areas designated as Local Green Spaces (LGS). **MM91** removes reference to "local urban green space" from Policy GB1 and is necessary for consistency and clarity. Changes to the supporting text of Policy GB1 would also be necessary to clarify how development in areas designated as LGS would be considered against local policies and national planning policy (**MM94**).
122. The Plan seeks to re-define some areas defined as Green Wedges as LGS. This was supported by the recommendations and conclusions of the Joint Green Belt Review. In redefining these areas the Council agrees with the study in that they no longer reflect the purposes of Green Belt, particularly in relation to the separation of settlements or the managed growth of urban areas. Where they still remain relevant is in relation to their recreational, ecological and biodiversity value and in providing a valuable local amenity. The proposed amendments to GB1 and its supporting text would help to

⁵⁰ NPPF paragraph 90

protect these areas by restricting development to that which supports the sites' purposes as green space.

123. The NPPF⁵¹ does not recommend LGS designations for large tracts of land such as Green Wedges. Whilst the proposed LGS designation along the Sowe Valley may be seen as large, it is not extensive or unrelated to local communities⁵². PPG⁵³ reflects the NPPF in respect of large tracts of land not being designated as LGS but also says that there are no hard or fast rules about how big LGS can be. Development in these locations would effectively be limited to infill or controlled growth thus reducing the likelihood of urban sprawl. Furthermore, in defining the areas of LGS the Council has sought to minimise any harm to the remainder of the Green Belt.

Reserved or Safeguarded Land in the Green Belt

124. The submitted Plan sought to reserve land in the Green Belt that was separated by two administrative boundaries – namely, Coventry City Council and Warwick District Council. The Council sought to support any approved allocation by Warwick District Council in that area and to avoid creating Green Belt 'islands' in Coventry. However, the status of 'reserved' land is unclear as it is not set out in national planning policy. It is also uncertain how such land would come forward within the Plan period if necessary, other than through a Plan review. As such, to provide clarity **MM95** amends Policy GB2 to refer to this land as 'safeguarded' rather than 'reserved' and clarifies that safeguarded land would be considered as part of any subsequent Plan review if the development proposals in Warwick District Council come forward during the Plan period (**MM96** and **MM97**). I consider these changes to be necessary in order to be consistent with national planning policy and for the effective delivery of the Plan.

Keresley SUE Allocation

125. It is proposed that the allocation will include development of approximately 3,100 dwellings of which 25% will be affordable housing. In addition, two new primary schools, a secondary school, a local health facility, two new local centres as well as green and blue infrastructure. The Council assessed a number of constraints as part of the SA/SEA process which led to the selection of the area proposed for the SUE. A summary of these is provided in the Council's statement for Hearing Session 8⁵⁴. The Green Belt Matrix Assessment⁵⁵ includes an assessment of all of the Green Belt parcels. The Development of this site would clearly represent some reduction in openness. However, key views and features would be protected and given the immediate context of existing development, the reduction in openness would not be significant. It would not have a significant effect on the purposes of including land in the Green Belt in this case.
126. One of the key aspects of delivery of the site will be the proposed link road. This piece of infrastructure will be necessary to support the distribution of

⁵¹ NPPF paragraph 77

⁵² CCC Hearing Statement to Hearing Session 8 (LP205)

⁵³ Paragraph:015 Reference ID: 37-015-20140306

⁵⁴ CCC Hearing Statement to Hearing Session 8 (LP205)

⁵⁵ Examination Document LP77

traffic around the site and wider area. The Council will work with Highways England and the County Council to consider medium-longer term enhancements to the M6 junction 3 and the strategic route that connects the M6 to the north and the A45 to the west.

127. The new link road would be included as part of this wider strategic connectivity. The Council is also exploring options for the growth of Pro Logis Park which would help justify connectivity of the link road. However, this remains part of ongoing discussions with N&BBC as it is outside Coventry's administrative boundary. Longer term, the Council anticipates wider strategic improvements to the M6 to be supported by devolution deal funding and other sources of finance. This is anticipated to come on stream between 2021 and 2026 to assist completion of the link road which would support the subsequent delivery of later phases of the SUE. Proposed changes to Policy H2:1 (**MM54**) would refer to the need for appropriate junction improvements together with the protection of Jubilee Woodland and the need for appropriate screening to the existing residential areas.
128. Transport assessments were undertaken including traffic counts against the multi-modal Coventry Area Strategic Model (CASM) developed by Coventry CC and Highways England. The model was calibrated using a 2013 baseline and modelled various scenarios up to 2031 with a number of committed and planned highway measures in place. Account was taken of new development within and potentially adjacent to the City boundary. Highway modelling scenarios were run on a 'worst-case' basis with no adjustments made for demand management, peak spreading, increased public transport patronage or walking and cycling. From the Keresley SUE site 3,100 houses would generate 1,680 vehicular trips in the AM peak. The model shows that traffic would disperse fairly evenly when leaving the site in the morning peak hour. Similarly, there would be no unacceptable impacts resulting from planned development during the PM peak hours.
129. During the examination the CASM was updated⁵⁶ to take account of different scenarios with a forecasting year of 2034. In addition to the LP development scenarios, an assessment was also undertaken to ascertain the impact on the highway network for various stages of the Keresley development, without the Keresley link road. The model shows that as the number of houses increases, without the link road, there would be an increase in traffic but that these increases would be less than 5% and could be accommodated on the highway network.
130. With the link road in place, there would be journey time improvements but more traffic on some connecting roads. However, these could be accommodated without any unacceptable impacts on traffic congestion. The link road would also reduce traffic volumes on Tamworth Road and Sandpits Lane. The monitoring framework (as amended via **MM151**⁵⁷) would monitor progress of delivery of the new link road prior to full completion of the SUE as well as completion of the new A45 junction. Development progress would be monitored and occupation linked to relevant triggers within the monitoring framework.

⁵⁶ Transport Modelling Update (December 2016): Examination Document LP259

⁵⁷ Examination Document MOD.10

131. Whilst the assumptions and projections represent a snap shot in time and will require delivery of supporting infrastructure, I am satisfied that the proposed SUE could be delivered without unacceptable impacts on the highway network. Policy AC3 would ensure that each phase of development is supported by appropriate and timely travel planning and assessment at the planning application stage.
132. I have already considered the spatial strategy and the need to deliver sufficient housing to meet the Plan's requirements. I have also concluded that changes to the Green Belt boundaries are required to meet the identified need for growth. These factors, along with limited opportunities outside of the Green Belt elsewhere in the City amount to exceptional circumstances which justify altering the boundaries of the Green Belt in order to allocate the Keresley SUE. The proposed allocation is justified, effective and consistent with national policy.

Eastern Green SUE Allocation

133. It is proposed to develop approximately 2,250 dwellings including 25% affordable houses, 15 ha of employment land, a new local health facility, a primary school and a new Major District Centre together with blue and green infrastructure at the Eastern Green SUE. The Council acknowledge that one of the key challenges of delivering this site will be securing appropriate site access. The master planning work to-date has explored the options of pedestrian and public transport connections to the existing local highway network. In addition a new junction to the A45 would resolve existing access issues. This would need to be delivered up front to support access to the site. As outlined above, the Council are considering the exact details of this junction including a grade separated junction – upon which the strategic transport modelling has been based. The new Policy DS4 will set out specific master planning principles for the site including the need to make appropriate provisions for new transport infrastructure and highway improvements to support comprehensive delivery of the site.
134. Policy H2:2 as submitted, requires that the 15ha of employment land is brought forward in advance of the residential development. Whilst the Council is concerned that the employment element of the mixed-use site would not come forward until after development of the residential element, as currently worded, the policy implies that there would be an inflexible phasing approach imposed on the site. This may hinder the ability to deliver the site and to ensure that there is a timely delivery of new homes, including much needed affordable homes. As such, the wording of the policy needs to be changed to clarify that the employment land should be developed in tandem with the residential element (**MM54**). Other changes to Policy H2:2 proposed by **MM54** would refer to the necessary junction improvements and to screening to manage the transition of land use into the wider Green Belt.
135. The Meriden Gap is not formally designated but refers to the area of land separating Coventry from the wider urban edge of Greater Birmingham (starting at Solihull). The village of Meriden is broadly located at the centre of that 'gap' along with a number of other villages. The Council has considered the relationship between Coventry and each of these locations, including the spatial relationship and the distance between them and proposed development

within the Plan. This has also been considered through the DtC with Solihull BC as the majority of the gap and villages within it lie within its administrative boundary. The gap between Coventry and Solihull extends approximately 5 miles at its narrowest point and when the proposed development at Eastern Green is considered, this gap does not reduce. This area of development has been supported in principle by Solihull BC which has promoted development around the HS2 station proposed in this area. This development would reduce the gap by approximately 1 mile.

136. The Council's Green Belt reviews identify the possible reduction of the gap and the impact on its wider setting. However, in relation to the Eastern Green development, the Green Belt assessment conducted in 2007 identified the southern part of the site as having potential for development. The study conducted in 2015 also scored the area lower in recognition of the urbanising features towards the north east of the site around the golf course and hotel. There is also the Meriden Business Park along the northern edge of the A45 and Land Rover dealership which provide an urban frontage in this area.
137. The gap between Coventry and Meriden would not be reduced by development at Eastern Green. The Council is working with Solihull BC to ensure that a strategic gap between Coventry and Solihull will be retained through the ongoing DtC work. Furthermore, I agree with the Council that when travelling to and from Coventry and Meriden along the A45, the village is not visible from the road or from the western edge of Coventry.
138. The gap between Coventry and Hampton in Arden would remain unchanged by the proposed allocation. In relation to the proposed development at Cromwell Lane the impact would not be significant given its location beyond Balsall Common and Berkeswell. The development would be approximately 4.4 miles from the settlement. I have considered the Inspector's comments in relation to the Meriden Gap for the CS (2009) examination. However, there has been a significant change in circumstances given the level of growth now identified for Coventry. Furthermore, there are fewer opportunities for development given that some of the alternative sites identified for the CS (2009) have now been developed. In any case, the direction of growth planned for the SUE would not reduce the physical or visual separation between the western edge of Coventry and Meriden. Pickford Green would be kept separate through a green buffer zone defining the north western extent of the development. As outlined above, changes to Policy H2:2 would set out this requirement clearly. Development of the SUE would not have a significant effect on the purposes of including land in the Green Belt.
139. The Eastern Green SUE would not have a significant impact on the local highway network in terms of delay or average speed. Local roads would see an increase in traffic as a result of the development but would have the capacity to accommodate it. Journey times on roads close to the development are anticipated to increase by up to 42 seconds on a journey of over 8 minutes which equates to a 9% increase. I consider this later in my report.
140. For the above reasons, there are exceptional circumstances which justify altering the Green Belt in this case. The proposed site allocation at Eastern Green is justified, effective and consistent with national policy.

Are the Local Plan's policies and proposals for other allocated sites in the Green Belt justified and deliverable?

141. The Walsgrave Hill Farm site would be developed for housing within the Green Belt adjacent to the existing built up area of Eastern Coventry. It is proposed to retain significant areas of green infrastructure to support the required drainage and flood risk mitigation in the area. Highways England propose a new grade separated junction along the A46 which would support a new spine road through the site allowing an appropriate access as well as supporting cross boundary development in Rugby BC. Proposed changes to Policy H2:3 would include reference to this as well as necessary drainage and flood risk infrastructure (**MM54**).
142. The site at Browns Lane would provide approximately 475 houses. Part of the site adjoins an employment site – Lyons Park - but it is surrounded on other sides by residential development. The Council has considered the site's relationship with the Coundon Wedge and found that extending the allocation to the highway would allow for better access and not impact on it. I find no reason to disagree and appropriate green infrastructure and landscaping could enable the development to be screened from the highway. **MM54** would reinforce the importance of retaining important trees and hedgerows as well as the need to focus the primary access at Coundon Wedge Drive.
143. The allocation at Sutton Stop would provide approximately 285 dwellings as well as a marina and 1.5 ha of employment land. One half of the site benefits from extant planning permission. Development of the rest of the site would provide an opportunity for highway improvements to support the allocation and help alleviate existing highway pressures in the area. It would also offer opportunities to link with the canal towpath network incorporating rights of way and promoting active travel. The Joint Green Belt review describes the area as sitting between Coventry and Bedworth. However, the parcel of Green Belt land does not play a separating role between the two settlements as the two have effectively merged by the development to the west.
144. The site at Cromwell Lane comprises 4 parcels and would provide approximately 240 dwellings. The importance of providing a clear boundary and buffer to the wider Green Belt is set out in Policy H2:8. **MM54** makes reference to ensuring there would be defensible boundaries to listed buildings within and adjacent to the site through appropriate screening including to existing residential areas. **MM54** would also include reference to the need for junction improvements. The site is located on the edge of the Coventry urban area. The recent redevelopment of the former sports centre reflects a western expansion of the City's urban area in this direction. However, the proposed allocation would not intrude further west than the existing urban area. The site would make a substantial contribution to the supply of housing land. Development would not have a significant effect on the purposes of including land in the Green Belt. As set out above, there are exceptional circumstances which justify altering the boundaries of the Green Belt.
145. The gap between Coventry and Balsall Common and Berkswell was also considered as part of the Joint Green Belt Review in 2015. The distance between the narrowest point between the east of Balsall Common and the western edge of Cromwell Lane is approximately 1.4 miles which would reduce

to 1.3 miles should the allocation be developed out to the City boundary (which is not proposed but presents a worst case scenario). The allocation would thus not have any significant impact on the openness or separation between Coventry and Balsall Common. The Green Belt assessment of 2009 considered this site as the least constrained parcel and although concerns were raised at the CS examination, there are some notable differences from that scheme to the one now proposed, with particular regard to the proposed woodland planting, reduced density and extent of the proposed allocation which would have less of an impact on the wider Green Belt in this location. Solihull BC has not raised any concerns in this regard through the DtC joint work. Proposed green infrastructure to the western edge of the site would assist with screening the development from the wider Green Belt.

146. The Council acknowledge that concerns were raised by residents in respect of securing an appropriate access and traffic congestion. Initial highway modelling has not identified any significant concerns. The CASM predicted that the volume of trips associated with the development would be low, representing under 7% of traffic on the local highway network. The development would slightly increase traffic on Cromwell Lane but would not have a significant impact on delay or average speed. Journey times near the development would remain very similar with only a few seconds increase whilst increases in junction delay would be less than 20 seconds.
147. Nonetheless, the Council are exploring how to manage more detailed access and junction improvement options in advance of any planning application in partnership with Warwickshire County Council and the transport arm of the West Midlands Combined Authority. It is also considering how to alleviate parking and highway pressures that exist due to the Tile Hill railway station park and ride facility including increasing the number of parking spaces and expanding the residents' parking permit scheme. The Council consider that there are no insurmountable barriers to development of the site and I see no reason to disagree.
148. The London Road/Allard Way site would provide approximately 200 dwellings within the existing urban area of Coventry between the residential areas of Whitley and Willenhall and is well served by public transport as well as being near to key services and facilities. The two locally listed structures on the site would need to be retained and incorporated into the site and this is set out clearly in Policy H2:9 (**MM54**)⁵⁸.
149. In light of the above, and my wider conclusions in relation to the significant growth anticipated in the area, the City's tight administrative boundaries together with the shortage of suitable, available land there are exceptional circumstances to justify alterations to the Green Belt boundary in order to allocate these sites, and the others identified in the Plan, for development. The proposed allocations are justified, effective and consistent with national policy.

Other Site Allocations

150. The allocation at Whitmore Park would comprise of residential and employment development. Part of the site has already been developed with

⁵⁸ Examination Document MOD.3

106 dwellings completed, 47 under construction and 76 with extant planning permission. The remainder of the site is subject to ongoing pre-application discussions between the developer and the Council.

151. The development of Paragon Park would offer opportunities to develop and regenerate a former employment site for approximately 700 houses and to link these new homes to employment within the surrounding area. The allocation has an extant planning permission which includes an initial masterplan layout.

Should other Green Belt or greenfield allocations be made?

152. There is no compelling evidence before me that development needs during the Plan period or beyond it would justify allocating other Green Belt sites for development. The evidence supports the soundness of the allocations proposed in the Green Belt and the Council's decision not to allocate any other Green Belt sites in the Plan.

Conclusion on Issue 4

153. For the above reasons I conclude that, subject to the MMs that are necessary for soundness, the Plan complies with national planning policy in its approach to the Green Belt; that the allocations of Green Belt land, including the SUEs at Eastern Green and at Keresley, would not have a significant effect on the purposes of including land in the Green Belt, either alone or in combination with the other allocations of land in the Green Belt and are justified and deliverable; and that no other Green Belt or greenfield allocations are necessary. Furthermore, the allocated sites are appropriate and deliverable and the detailed requirements for their delivery are clear and justified.

Issue 5 – Does the Local Plan provide the infrastructure necessary to support the delivery of development?

154. The Plan sets out how the Council will work in partnership with neighbouring local authorities, Local Enterprise Partnerships, the West Midlands Combined Authority (WMCA) and others to deliver the necessary infrastructure to support growth. Policy H2 and new Policy DS4 (Part A to Part D) identify key infrastructure requirements for the SUEs and larger strategic sites. In addition, the IDP sets out the infrastructure required as well as details of costs, timing and funding options. This will be kept up to date in order to inform the master planning process and/or decision making.
155. **MM146** and **MM150** clarify that the IDP will be managed to reflect strategic cross-boundary infrastructure that will be delivered outside Coventry but will support the growth of the City as part of the DtC collaborative work. In addition, **MM147** would add clarity by setting out that category 1 'Essential Infrastructure' identified in the IDP and/or the Regulation 123 list would be the focus of developer contributions in order to support delivery of the Plan's growth. This would help to set out the Plan's priorities for contributions linked to delivery of the Plan strategy. In tandem with these changes, proposed changes to the IDP would identify category 1 infrastructure that would be necessary to enable development to proceed.

156. **MM145** and **MM149** change Policy IM1 and its supporting text to set out the most up-to-date position in respect of the Devolution Deal as part of the WMCA. Also, to set out that the IDP will be linked to the Monitoring Framework as an integral part of the evidence base to determining the need to review the Plan in accordance with Policy DS1.

Transport Infrastructure

157. The IDP identifies major highway infrastructure, including that required for delivery of the SUEs, as the highest priority for delivery. All known transport infrastructure to support the SUEs has been identified in the IDP, including an update regarding the Eastern Green and Keresley SUEs and some updated information around initial timescales for delivery, priority and costs⁵⁹. **MM31** and **MM119** ensure that highway infrastructure to support improved access to Whitley Business Park is identified as key to delivery of the Plan's objectives.
158. As outlined above, the CASM considered the impacts of proposed development in the Plan across the City having regard to localised pressure points and infrastructure options. During the examination, this work was developed further with specific regard to the Eastern Green and Keresley SUEs to define the quantum of development that could take place before the identified road infrastructure became essential⁶⁰. This was undertaken to inform the timing or phasing of such infrastructure. In addition, Policy AC3 sets out the need for Travel Assessments and Travel Plans. However, in recognition that assessments for the SUEs would require more detailed modelling of each site to determine the demand for new trips, the impact on existing networks and any required mitigation, the Council updated the CASM in order to define in greater detail the infrastructure required and the timing of its delivery. This information has also informed the update to the IDP, Policy H2 and the new proposed policies DS4 (Part A to Part D) on master planning principles.
159. The CASM estimates that planned LP growth will lead to an 18% increase in the number of trips made by all modes by 2034. Proposed developments on the outskirts of Coventry would predominantly use the car whilst development close to the City centre would lead to a greater proportion of trips being made by public transport, walking and cycling. It is anticipated that a higher proportion of new residents would travel out of Coventry to work in the future. This is due to there being a reduction in the number of jobs compared to workers, thus drawing workers to jobs outside the local authority area.
160. The CASM shows that the increase in traffic associated with the LP growth would lead to an increase in the distance travelled by car and delay experienced by car journeys across Coventry. Also, some of the spare capacity in the local highway network would be filled, particularly around the key development sites, the A45 and A46. This would result in up to a 37% increase in highway network delay for vehicles equating to up to 34 seconds and a reduction in average speed of 3KPH over the City as a whole. Junctions that would experience the most increase in delays would be on key routes in and around Coventry, particularly the A45 and around the M6. However, to

⁵⁹ Examination Document LP134

⁶⁰ Transport Modelling Update Report December 2016: Examination Document LP259

put this into perspective, only 3 junctions in the AM peak and 4 junctions in the PM peak would experience increased delays of over 1 minute 20 seconds. The CASM has assessed junctions to identify where pressures may occur in future. These would be further assessed when planning applications come forward to investigate the most appropriate mitigation, including delivery of any necessary infrastructure to ensure that the highway network continues to operate effectively.

161. The CASM did not include details of HS2 as the Council are currently awaiting traffic management plans and other information. The CASM takes account of known factors but in the absence of specific details in respect of the precise route alignment, HS2 could not be factored into the CASM at this stage. However, once these details are known the CASM can be updated. In the meantime, the situation will be monitored and any necessary infrastructure provision or mitigation could be facilitated through travel assessments and the monitoring framework. Any adjustments could be made to the Plan if necessary via a plan review. Proposed changes to the Plan via **MM118** and **MM121** would set out the most up-to-date position in the Plan, following the latest CASM work.
162. Whilst the Plan is clear about the need for new development sites to be well linked to existing networks, the Council agreed during the hearings that the Plan is not sufficiently clear in some cases, about the specific need to extend routes to serve the SUEs. Proposed changes to Policy AC3 and the supporting text would address this (**MM123**). The West Midlands Strategic Transport Plan sets out the overarching transport strategy for the area and the Plan's policies have regard to it. In particular, policies that support strategic connectivity such as rail, HS2 and rapid transit. However, **MM115** and **MM117** clearly identify this link as well as confirming the Plan's vision of a metropolitan tier with a metropolitan rail and rapid transit network and cycle network. The master plans would also provide opportunities to provide connectivity both within the sites and externally to neighbouring areas. They would be designed to maximise the use of public transport, including the provision of new and extension of existing services as well as walking and cycling.
163. The Plan's proposals for a rapid transit network align with the West Midland Strategic Transport Plan. There is ongoing work to refine the routes and phasing linked to the Devolution Deal as part of the new WMCA. Integration of the rapid transit network with new development would be considered through the master planning process which would help to inform the precise route alignments. As part of its joint working, the Council is working with Transport for the West Midlands (TfWM) - the transport arm of the WMCA - to ensure that development proposed in the Plan would be taken into account when planning future public transport and network requirements. **MM44** and **MM122** would set out how the Council is working with TfWM.
164. Provision for integrating the rapid transit route within the Eastern Green SUE would be made in the proposed new Policy DS4 (Part D). The policies in the Plan (as proposed to be amended) would provide an overarching framework with sufficient detail at this stage to guide more detailed master planning for the transport infrastructure required for the strategic sites and for links to surrounding areas. Amendments to the Plan are necessary to make reference

to Rapid Transit and bus as a means of transportation (**MM14**) whilst **MM15** would ensure that explicit reference to the provision of a high quality public transport network which integrates with walking and cycling routes is made within the Vision and Strategy objectives of the Plan.

165. Changes to Policy AC5 and the supporting text are required to emphasise this partnership approach and clarify how the Plan would support delivery of the Strategic Transport Plan's objectives, particularly in relation to providing quality bus services to new developments and how it would comply with the TfWM access standards (**MM114** and **MM125 to MM128**). Furthermore, whilst Policies AC1 and AC4 require new development proposals to incorporate new cycle routes and ensure that they are well linked to the existing cycle network, **MM116** and **MM124** would explain the role of the West Midlands Cycle Charter and include reference to the need for cycle parking at new sites and along the wider public transport network at transport interchanges and stations, such as Pool Meadow Bus Station, as appropriate.
166. In addition, **MM58** modifies Policy H3 to add a new criterion to say sustainable transport and supporting infrastructure in new housing schemes should be considered from the outset to improve access to public transport, cycling and walking. Changes to Policy DE1 regarding design would ensure that the integration of through routes for public transport and the incorporation of bus priority measures where appropriate would be considered for all development proposals (**MM106**). This would also be reflected in changes to Policy JE7 (**MM45**). These changes are considered necessary to ensure that the Plan is effective.

Modal Shift

167. The Council acknowledge that the Plan target for a 10% modal shift from single occupancy car use to more sustainable forms of travel will be challenging. However, it is considered to be realistic based on the anticipated level of investment in infrastructure as well as evidence of changing travel habits such as an increase in home working, walking and use of public transport. The NPPF aims to extend transport choice, reduce congestion and encourage the use of sustainable modes of transport. It expects this to be achieved through improving accessibility, promoting walking, cycling and use of public transport, promoting a mix of uses for larger scale developments to encourage shorter journey lengths for employment, education, shopping and leisure as well as improving traffic management and infrastructure⁶¹.
168. Whilst it would be unrealistic to expect traffic to flow unimpeded at peak times or to attempt to build sufficient road capacity to accommodate and prioritise the convenience of car users, the CASM assessed the impact of new development on the highway network on a worst case scenario based on current travel behaviour without the 10% modal shift target. The model showed that increases in traffic could generally be mitigated without it.
169. It is intended to measure progress in achieving the modal split via the monitoring framework (**MM151**⁶²). The monitoring framework would include indicators to measure impacts and mitigation measures of approved TAs and

⁶¹ NPPF paragraphs 29 to 32 and 34 to 38

⁶² Examination Document MOD.10

an assessment of the provision of transportation infrastructure. This would be used to update the IDP as well as inform investment priorities through S106/CIL. It would also inform updates to the CASM in order to identify any necessary remedial actions including review of the Plan where necessary. Updated information in the IDP would identify all development projected to come forward together with information on the infrastructure requirements. This would ensure that there is a benchmark for monitoring delivery of infrastructure which would be linked to the monitoring framework to provide additional clarity and ensure that the necessary infrastructure is delivered at the appropriate stage.

170. This approach would provide the Council with a delivery and funding implementation timetable which would inform the master planning process as well as ensure the funding is in place to enable the relevant infrastructure to be provided at the appropriate stage. Furthermore, it would provide a basis for the Council to monitor progress by setting out a programme and key progression points for the critical infrastructure and to identify what action would be taken if the delivery of infrastructure fails to progress as expected.

171. **MM12** emphasises the need to balance the needs of public transport, cycling and walking in the key issues and opportunities table.

Air Quality

172. The whole of Coventry is designated as an Air Quality Management Area (AQMA). The Plan acknowledges that emissions from road transport are the major source of pollution in the area, with emissions from industry also having a negative impact on air quality. The Plan sets out how the Council is working together with its West Midlands neighbours – as a partner of the Low Emissions Towns and Cities programme – to reduce emissions from road transport.

173. Changes to the supporting text of Policy EM6 would clarify that the West Midlands Metropolitan Transport Emissions Framework (WMMTEF) and its associated policies set out transport's role in tackling air quality issues (**MM138**). In addition, changes to Policy EM6 would make clear that major development proposals should be in accordance with the WMMTEF and associated policies (**MM138**). These changes are necessary to ensure that the policy is effective. Policy EM6 'Air Quality' would change to Policy EM7 as a result of a new policy EM6 'Redevelopment of Previously Development Land' being included in the Plan (referred to in more detail below).

174. The AQMA would be monitored and an indicator would be included in the monitoring framework via **MM151**⁶³ to monitor background and peak levels of air quality to seek an improvement with a view to removing parts of the City from the AQMA status. In addition, the provision of new air quality monitoring stations is identified in the IDP as necessary new infrastructure.

Conclusion on Issue 5

175. The Council has undertaken a thorough and robust assessment of the transport implications of development in the Plan and is satisfied that the

⁶³ Examination Document MOD.10

effects of the strategic sites and allocations on traffic and transport can be adequately mitigated. The Plan will provide effectively for delivery of development, including any necessary supporting infrastructure. There would be sufficient scope to review transport, infrastructure and mitigation measures as the development of the strategic sites progress to ensure that the transport network is accessible and opportunities are taken to improve connectivity.

Issue 6 – Does the Local Plan make adequate and appropriate provisions to meet employment development needs?

176. Coventry's economic base has shifted from a predominance of manufacturing over recent decades. Today the majority of jobs are in healthcare and education. These trends have meant changing needs in terms of employment land and premises. The growth in employment and diversification is predicted to continue throughout the Plan period. The Council's employment land review⁶⁴ has considered recent take up rates based on annualised averages and actual completions. It has also had regard to projected employment growth, market signals and the City's relationship to employment land on its boundary. It recommends that there is a gross employment land requirement of around 215 ha over the Plan period, which includes a 58 ha 5 year supply margin. In terms of the Coventry and Warwickshire LEP area, the recent employment land use study conducted for the wider area recommends that between 500 and 660 ha of employment land is required up to 2031.
177. Approximately 64 ha of employment land in Coventry is identified in the SHLAA as potentially suitable for housing, whilst since the start of the Plan period around 90 ha of employment land has been granted planning permission or developed for employment uses. Thus when considering employment growth needs as a whole, adding this additional 154 ha to the 215 ha identified, the City's employment land requirement is 369 ha. There is thus an identified shortfall. This is planned to be provided within Coventry and also in Warwickshire but adjacent to the City boundary - principally at Ansty Park, Ryton Park and Coventry Gateway which are being actively promoted by neighbouring Councils. The proposed redistribution has been agreed as part of the Coventry and Warwickshire Employment Land MOU⁶⁵. **MM22** would set out the land supply position and agreed redistribution across the sub-region more clearly.
178. Coventry's employment land supply is approximately 146.5 ha within or immediately adjacent to the City boundary. However, if recent completions are taken into account this figure falls to approximately 101 ha. With signs of strong growth in the demand for new employment land around Coventry and Warwickshire, the Council's evidence base points to the need to boost supply in the medium to longer term. Immediate supply within the area is identified as being sufficient but longer term supply is flagged as being problematic due to a reliance on a number of large sites and constraints imposed by Green Belt policy. As such, the Council seeks to allocate additional land for employment development within the Green Belt as well as supporting its Warwickshire

⁶⁴ G L Hearn Employment Land Review 2015: Examination Document LP30

⁶⁵ Coventry & Warwickshire Employment Land MOU: Examination Document LP209

neighbours' intentions to allocate additional sites adjacent to the City boundary within the wider Green Belt.

179. Policy JE2 sets out the provision of employment land and premises for the Plan period including a rolling land supply of 58 ha. Proposed main modifications to the policy and its reasoned justification – including the table which provides a breakdown of the components of employment land supply – are necessary in the interests of clarity (**MM39** to **MM43**). The proposed employment land provisions set out in Policy JE2 (as proposed to be amended) would meet identified needs throughout the Plan period. This includes quality office space, start up premises, grow-on space for planned expansions as well as land supply for B2 and B8 Use Class development.
180. In order to ensure that the Plan refers to the strongest employment growth sectors **MM35** and **MM36** amend the supporting text of Policy JE1. This is necessary to ensure that the Plan reflects the latest position in the evidence base as the sectors listed in the submitted Plan reflect an earlier draft of the employment study. In addition, **MM38** refers to the importance of supporting the two Universities. Proposed changes to the Vision and Strategy objectives of the Plan would ensure that reference is made to support for the Universities and their importance as engines for research, innovation and culture in the City (**MM13**). These changes would ensure that the Plan is effective by making explicit reference to the recognition of the role the Universities have as drivers of job creation and the LP and AAP's roles in supporting and facilitating their continued growth and expansion.
181. Ongoing monitoring of the delivery of employment land and premises within and adjacent to Coventry will be monitored on an annual basis through the Council's AMR process as well as forming part of the sub-regional monitoring programme to support the employment land MOU and delivery of the CWLEP's Strategic Economic Plan. Furthermore, changes to Policy DS1 (**MM27**) would ensure that a failure to provide the necessary employment land would result in a need to review the policy and identify additional sites to ensure that adequate land was available to support the identified economic growth.
182. The evidence suggests that the supply of employment land would be aligned to economic and labour market forecasts and takes into account Coventry's population projections, economic activity, unemployment rates and commuting patterns. The Plan provides for an appropriate geographical correlation between the distribution of employment and housing. Overall, it would provide for an appropriate level of growth in the context of the wider C&W LEP area and would be sufficiently flexible to accommodate the level and type of growth forecast. The Plan's approach is thus considered sound.
183. The automotive manufacturing sector is heavily influenced by the operations of a few key companies – particularly Jaguar Land Rover (JLR). The sector has seen strong performance and jobs growth in recent years. The Council recognises the importance of JLR to the economy of the City, the sub-region and nationally and fully supports its continued future growth and expansion both within and adjacent to Coventry. A separate policy to support this growth is not necessary, given that the JLR sites in Coventry are in areas where the Plan already proposes employment based development or links to land outside Coventry. Land around the Whitley Business Park, where JLR is

based, is included for allocation in Policy JE2 as well as land to the south east which is allocated for an extension to the existing operations.

184. Furthermore, the Plan makes provision for removal of land for the Gateway/Whitley South development proposals from the Green Belt (JE2:4). This could facilitate further expansion opportunities for JLR. New policy DS4 (Part B) would support joint working with WDC as well as positive consideration of the ecology and biodiversity issues associated with the site. For the reasons outlined above, and my wider conclusions in relation to the need to accommodate the anticipated growth and the limited opportunities for development elsewhere in the area given the City's tight administrative boundaries, there are exceptional circumstances which justify altering the boundaries of the Green Belt to accommodate the planned development and allocate the site at Gateway/Whitley South.

185. Taken together, the Plan's policies and proposals would clearly support the future expansion of JLR. However, in order to emphasise the strategic importance of JLR to the City, modifications to the Plan to include additional text to the introductory section of chapter 3 (**MM3** and **MM21**) as well as additional reference in Policy JE1 (**MM37**) and Policy DS2 (**MM30**) are necessary. In addition, new Policy DS4 (Part B) would relate directly to master planning at the Whitley employment hub site, and refer explicitly to the future expansion of JLR (**MM31**). Changes to the supporting text of Policy JE2 (**MM39**) would also make reference to the growth aspirations of JLR in relation to Whitley South (within Warwick District). I consider these changes to be necessary in the interests of clarity and to ensure that the Plan is effective.

Conclusion on Issue 6

186. In conclusion, subject to the MMs identified as necessary for soundness, the Plan provides adequate and appropriate provision to meet the identified need for employment land and sufficient flexibility to support employment generating development proposals.

Issue 7 –Does the Local Plan make appropriate provision for retail, leisure, tourism and related uses? Are the Local Plan's policies for the hierarchy of retail centres positively-prepared, justified and effective?

187. The Council's retail strategy is underpinned by a number of studies including the City Wide Shopping and Centres study⁶⁶ which used data from Experian as well as primary research around shopper trends and habits in the area and a review of the retail based catchment area. The study factored in allowances for growth in market share, linked to planned improvements in the City centre as well as an allowance for e-retailing which recognises the growth in market share for internet shopping but includes the need for retail floor space with links to click and collect services.

188. It considered projections for retail needs linked to both a constrained level of housing growth and the total population growth projected for the City up to 2031. This approach reflects the joint Coventry and Warwickshire SHMA work. Through consultation and its on-going DtC work, the Council has

⁶⁶ Coventry City Wide Shopping and Centres Study NLP (2014) Examination Document LP59

planned for the total level of retail need to meet the City's full projected population growth to 2031. This is to reflect the City centre's position as a sub-regional centre together with its accessibility and its aspirations in terms of several key regeneration schemes, such as Friargate.

189. A total of 106,834 sq m of gross retail floor space has been identified as the requirement over the Plan period. Tables 5.1 and 5.2 of the Plan set out this total retail need, broken down by type. Amendments to these tables are necessary to update these figures and set out in a footnote that an allowance has been made in the short term projection for at least 10,000 sq m of new retail floor space at City Centre south (**MM74** and **MM75**). I return to this below. Changes to Table 5.2 would provide additional clarity by setting out the total retail need broken down into periods – to 2021, 2021-2031 and the Plan period from 2011 to 2031 (**MM75**).
190. The NPPF advises that local planning authorities should define a network and hierarchy of centres that is resilient to anticipated future economic changes⁶⁷. Coventry City centre sits at the top of the Council's centres hierarchy as the main focus for comparison shopping as well as employment, leisure and entertainment. It is clear from the evidence that it is necessary to ensure that the City centre is regenerated and revitalised in order to maximise its City-wide catchment, compete with surrounding areas and support the City as a whole. Alongside the Local Plan, the Council's Area Action Plan (AAP) contains specific policies which focus on the City centre. The Primary Shopping Area is designated through the AAP.
191. The hierarchy is set out in LP Policy R3 which identifies Major District Centres (MDCs), District Centres (DCs) and Local Centres (LCs) which sit below the City centre. The Council's Local Centres Assessment⁶⁸ has considered the management of the hierarchy as a whole to ensure that it supports rather than competes with the City centre. This is set out in the Plan. The Council's evidence recognises that retail and the role of town centres are changing and that there is a need for centres to diversify and bring in a greater level of leisure, tourism and entertainment uses. In view of this, the retail strategy aims to maximise flexibility in terms of how retail space is allocated. Rather than specifying A1 uses and risking higher vacancy rates, retail need has been grouped within a broader use class range (A1 – A5) to ensure that floor space is flexible and can adapt to market needs quickly.
192. Table 5.3 sets out how the overall retail needs will be met over the Plan period by setting out the components of the supply including existing commitments and allocations. Amendments to this table to provide a breakdown of convenience, comparison (A1) and other retail (A2 – A5) provision (**MM76**) provide the necessary clarity in terms of how the needs for both comparison and convenience retail floor space would be met. In addition, the figures in this table would be updated to reflect the most up-to-date position since the study was undertaken in terms of completions, sites with planning permission and sites under construction.
193. Proposed changes to Policy DS1 (**MM24** and **MM26**) would set out the level of retail based floor space across use classes A1 to A5 that would be required

⁶⁷ National Planning Policy Framework paragraph 23

⁶⁸ Local Centres Assessment (2015) Examination Document LP60

over the Plan period whilst the addition of the word "based" after "retail" in Policy R1 would clarify that whilst retail provisions are the basis of the policy and floor space allocations, other supporting uses (within A1 - A5) would be acceptable in principle. This would provide additional flexibility within the policy to support the Plan's objective of providing a comprehensive portfolio of retail floor space and to reflect permitted development rights. It would also set out clearly the level of gross convenience floor space needed to 2031 and that at least 70,000 sq m would be allocated in the City centre.

194. A greater proportion of floor space is proposed to be allocated in the City centre – over and above the initial projections in the Shopping and Centres Study. This reflects the Plan's retail strategy to ensure that the City centre remains the focal point for new retail based investment and to support its role at the top of the hierarchy capitalising on its City-wide catchment and accessibility. It would also support the Council's regeneration objectives by focusing investment in the centre in order to benefit the City as a whole and to ensure that its role within the sub-region is not undermined. The study identifies that additional floor space could help to increase market share in the City by attracting greater footfall and opportunities to make qualitative improvements in the retail offer to meet changing demands.
195. There is adequate evidence that sufficient new retail floor space could be delivered within the City centre when developments with extant planning permission and other commitments in the area are taken into consideration. Furthermore, the proposed allocations for retail uses in other centres within the hierarchy would enable opportunities to support and complement rather than compete with the City centre. In order to be sufficiently flexible, changes to the supporting text of Policy R1 are necessary to make clear that if it is not possible to provide new retail opportunities within the Primary Shopping Area or wider City centre through the sequential assessment process then the focus should be on the other centres within the hierarchy as appropriate (**MM73**).
196. The Council's retail study⁶⁹ identified a floor space requirement of 17,667 sq m for comparison goods for the City centre. However, this requirement includes an uplift of 10,000 sq m to take into account the City Centre South scheme which was included as an existing commitment. The projections in the retail study thus identified retail floor space needs over and above that to be provided at City Centre South. Distinguishing this allowance from the rest of the identified requirement reflects that the scheme is a central element to the delivery of the City's retail strategy and will ensure that the contribution from this development will not be double counted when the Council allocate provisions against the overall need.
197. The retail study identifies a need for approximately 21,800 sq m retail warehouse floor space over the Plan period. It says that additional floor space should be accommodated within the designated centres where possible but the study also highlights the opportunities to focus retail warehouse demand towards the City centre. In line with the sequential approach in the NPPF, the Plan seeks to focus retail warehousing and the types of users that occupy

⁶⁹ Coventry City Wide Shopping and Centres Study NLP (2014) Examination Document LP59

these units within the City. This would also provide a potential opportunity to promote the Council's wider regeneration objectives. However, changes to table 5.1 are required to more accurately show the total warehouse need as a requirement across the City centre and rest of the City (**MM74**).

198. Policy R1 seeks to restrict further retail development at Arena Park Major District Centre (APMDC) unless it can be shown that it will not directly impact on the City centre. The retail study identifies it as having a large volume of retail floor space which, if expanded further, could compete with rather than complement the City centre. It is understood that the APMDC is fully occupied and trading well. However, there are limited opportunities to extend it with the only vacant land nearby already benefiting from planning permission for leisure uses. Nonetheless, I agree that further retail expansion of this centre would have the potential to adversely affect the City centre.
199. In order to align with the NPPF, **MM77** changes Policy R1 by replacing the words "impact" with "significant adverse impact". This will also ensure that the Plan is clear that any expansion proposals would need to be accompanied by robust evidence that it would not harm the vitality and viability of the City centre. Each of the centres will be monitored in terms of their performance and position within the hierarchy to ensure that any emerging issues can be identified and that the Plan's policies are appropriate in terms of helping to reduce vacancy rates and meet local and wider- catchment needs.
200. Policy R3 sets out the network of centres that comprise the retail hierarchy. However, some changes put forward by the Council are necessary to ensure that it is sufficiently flexible to enable identified retail needs to be met across the hierarchy. The policy is clear that the centres would be the preferred locations for new retail development and other town centre and community uses that do not serve a City-wide catchment. As submitted, the policy wording would contradict the statement that these centres in the hierarchy are the preferred locations to support the City centre. The deletion of the words "and are not more appropriately sited in the City centre" (**MM81**) is necessary in order to ensure that the policy is not overly restrictive.
201. Policy R3 seeks to support development in MDCs and DCs provided that it does not impact negatively on the City centre and will support the needs of their area of the City within a specified radius area – 3 km for MDCs, 2 km for DCs and 1 km for LCs. However, the Council agreed that the specified radii had not been justified by any detailed evidence to show that it would be necessary to adhere to these distances in order to ensure that they would not compete with the City centre. As such the requirement would be unduly onerous and serve little purpose. The deletion of these stipulated distances through **MM82** is thus necessary.
202. The NPPF requires a sequential assessment for all main town centre proposals outside of a designated centre and sets a threshold of 2,500 sq m for impact assessments, unless lower thresholds can be supported by appropriate evidence having regard to local circumstances. The Plan identifies the average unit size across all centres as being less than 400 sq m (for accuracy these figures have been updated via **MM78**). Policy R4 requires an impact test for proposals that exceed 400 sq m on the basis that the existing designated centres comprise predominantly of smaller units.

203. However, there is no substantive evidence to suggest that allowing proposals of 400 sq m would have a significant adverse effect on the role of the City centre or that impact assessments for proposals of this scale would be justified. During the examination the Council undertook its own analysis which showed that recent out of centre proposals range in size between 120 sq m to 1700 sq m, whilst the out of centre retail parks contain units which average around 900 sq m – 1200 sq m. The Council thus proposed to increase the thresholds for impact tests from 400 sq m to 1000 sq m. This is on the basis of the average unit size of the City's out of centre retail parks which would be the most likely focus for out of centre proposals.
204. PPG says that in setting a locally appropriate threshold it will be important to consider a number of factors, including the scale of proposals relative to town centres, existing vitality and viability of town centres, the impact on planned investment and the likely effects on any town centre strategy⁷⁰. In this context the Council has considered the impact of a scale lower than the default threshold in the NPPF but a level which is considered to be more aligned to the average unit size across the City. This would allow for proper consideration of the potential impacts on the vitality and viability of the City centre. Thus whilst the proposed threshold is below than that set out in the NPPF, the Council has had regard to local circumstances. I consider that, based on the evidence, this threshold would be appropriate in order to ensure that the Plan's town centre strategy is not undermined (**MM83**). Policy R4 would also allow for sufficient flexibility by stating that catchment areas for sequential and impact tests would be considered on a case by case basis.
205. Policy R4 requires the sequential assessment to include vacant units within the out of centre retail warehouse parks and local shopping parades. However, this requirement would not accord with the approach set out in the NPPF and may affect the delivery of sufficient retail floor space to meet the Plan's identified need by being unduly onerous and inflexible. **MM84 to MM87** rectify this conflict.

Conclusion on Issue 7

206. The Plan makes appropriate provision for retail, leisure, tourism and related uses and subject to the MMs necessary for soundness, the Plans policies for its network of centres are positively-prepared, justified and effective.

Issue 8 – Whether the policies for the Natural and Historic Environment, green space, the mitigation of flood risk and adaptation to climate change are justified and effective?

207. Policy GE1 seeks to maintain a strategic network of green and blue spaces such as woodlands, parks, ponds, canals and rivers and the links between them. Proposed changes to Policies GE1 and R2 to include specific measures to encourage the retention or reinstatement of tributaries or culverts where appropriate would strengthen support for their retention (**MM80** and **MM98**). **MM98** would strengthen support for the maintenance and enhancement of existing green infrastructure through specific reference to improving and maintaining connectivity, accessibility, biodiversity, flood risk management

⁷⁰ Planning Policy Guidance Paragraph: 016 Reference ID: 2b-016-20140306

and integrating proposals where possible to further improve green infrastructure.

208. The Council has adopted a Green Space Strategy which sets out minimum local standards for green space provision. Policy GE2 seeks to ensure that development would not create a deficiency of green space and sets out criteria that would need to be met if development would lead to its loss. Changes to add the word 'or' after each criterion (**MM99**) are necessary to add clarity to the policy and to ensure that it would be effective.
209. Policy GE3 seeks to ensure that any negative effects on biodiversity through development would be avoided or adequately mitigated where necessary. **MM100** and **MM104** would add a new criterion stating that development proposals should ensure that legally protected species and those covered by national, regional or local Biodiversity Plans are preserved. **MM101** sets out that biodiversity offsetting would be considered only in exceptional circumstances and **MM102** sets out that ancient and newly planted woodlands and heritage assets will be protected. A cross reference to Policy HE2 is necessary to clarify that all practical measures must be taken to assess and record archaeological remains.
210. Policy GE4 relates to tree protection. **MM105** clarifies that any unacceptable loss of trees or woodlands would be mitigated through their replacement with new trees as part of a well-designed landscape scheme.
211. Policy HE2 relates to conservation and heritage assets. **MM109** changes the wording of the policy to substitute the word 'conserve' with 'preserve' and to the supporting text (**MM107**) would ensure that the policy is consistent with the NPPF and the statutory test⁷¹. In addition, **MM110** would add other categories to buildings most associated with the City's industrial heritage. Further changes to the supporting text via **MM108** would provide the most accurate number of buildings which have been selected for local listing.
212. Policy HE3 relates to the creation of a proposed new City Heritage Park in the grounds of the Charterhouse. **MM111** and **MM112** change the policy wording and supporting text to convey the importance of developing a master plan to support delivery of the Heritage Park, the expansion/reconfiguration of the school sports grounds, naturalisation of the river valley and enhancement of the setting of the Charterhouse and surrounding area. These changes are necessary to provide sufficient clarity and to ensure that the policy is effective.
213. Policy EM1 relates to planning for climate change adaptation. Changes to the policy to refer to the need to seek opportunities to develop new blue infrastructure as appropriate (**MM129**), are necessary to improve its effectiveness. Submitted policies EM2 and DS3 require modification (**MM29b** and **MM130**) for consistency with national planning policy⁷² to ensure that they do not set any specific standards for residential development, beyond those within the Building Regulations.

⁷¹ Planning (Listed Buildings and Conservation Areas) Act 1990

⁷² Written Ministerial Statement: Planning Update dated 25 March 2015

214. Policy EM3 relates to renewable energy generation. The supporting text says that around 90% of Coventry is unsuitable for wind turbines due to insufficient wind speeds and the density of development. This is supported by a local wind mapping study. A further Written Ministerial Statement dated 18 June 2015 sets out considerations to be applied to wind energy development. It is thus necessary to amend the supporting text to clarify that the policy does not apply to wind energy developments, which will be considered against national policy and guidance (**MM132**). This change is necessary for consistency with national policy.
215. **MM133** and **MM134** make substantial amendments to policy EM4 and the supporting text in light from advice from the Environment Agency. The changes, which take appropriate account of viability considerations, are necessary to ensure the policy is effective in managing flood risk and protecting and enhancing water resources in a manner consistent with national policy.
216. In addition, proposed changes to Policy EM5 and the supporting text following advice from the Environment Agency are necessary to ensure that the policy is clear that all development must address flood risk from new developments, apply sustainable drainage systems (SDS) and should ensure that surface water runoff is managed as close to its source as possible (**MM135** and **MM136**). These changes, together with some consequential amendments to the supporting text are necessary to ensure that the policy is effective.
217. Further advice from the Environment Agency led the Council to propose a new policy during the examination. This would ensure that the Plan includes appropriate measures to address any potential risk to groundwater through the redevelopment of previously developed land. New policy EM6 and its supporting text (**MM137**) would also ensure that the Plan reflects the most recent published information in support of the Severn River Basin management plan. In addition, it would include measures to protect valuable water resource assets in Coventry that are deteriorating. These changes would also ensure that the Plan is effective.

Conclusion on Issue 8

218. Subject to these necessary modifications to ensure their effectiveness, the Plan contains sound policies to protect and manage the natural and historic environment, green infrastructure, open space as well as to mitigate against flood risk and adapt to climate change.

Issue 9 – Is the Local Plan's approach to Minerals and Waste planning justified, effective and consistent with national planning policy?

Waste

219. Policy EM7 reflects national planning policy in the NPPF as well as the Council's Waste Management Strategy in seeking to reduce the amount of waste sent to landfill. Around 92% of municipal solid waste in Coventry is incinerated in an Energy from Waste facility with the remainder going to landfill. The Plan recognises that the planned new growth will lead to a rise in all waste production and that recycling levels will need to be maintained and

increased throughout the Plan period in line with the Council's Waste Management Strategy. However, existing waste treatment facilities have been located in older industrial areas. The regeneration of these areas may mean that they are no longer compatible with new, more modern treatment facilities. As such, the Plan seeks to ensure that existing waste treatment facilities should be improved where necessary and safeguarded.

220. **MM140** is necessary to ensure that existing waste management facilities or land allocated for such uses would be protected from encroachment from incompatible land uses that are more sensitive to odour, noise, dust and other impacts. **MM140** would also make clear that waste management facilities would only be permitted where they would not have an unacceptable impact on surface or groundwater resources. This modification followed from advice from the Environment Agency and is necessary to help protect valuable water assets. Modifications are also required to delete the repetition of criterion d) and the re-numbering of the policy from EM7 to EM8 due to the insertion of new policy EM6 as outlined above (**MM139** and **MM142**).

Minerals

221. The NPPF requires Minerals Planning Authorities [MPAs], of which the City Council is one, to prepare an individual or joint Local Aggregate Assessment [LAA], the primary purpose of which is to assess requirements for and supply of minerals in the LAA area. Local Plans should define Minerals Safeguarding Areas [MSAs] so that specific minerals resources of local or national importance are not sterilised by other development, and include policies for the extraction of those resources. The NPPF also places emphasis on the use of secondary or recycled minerals in preference to primary extraction.
222. The West Midlands local authorities have a joint partnership arrangement to manage aggregate supply. The Local Aggregate Assessment 2016⁷³ sets out the aggregate supply over the Plan period. The 2009 sub national guidelines suggest that 165 million tonnes of sand and gravel and 82 tonnes of crushed rock will be required in the former West Midlands region from 2005 to 2020. The Aggregate Working Party Secretariat produced an indicative set of apportionments based on previous trends in sales. The proposed apportionment was 0.55 million tonnes of sand and gravel per year with no apportionment of crushed rock as there are no viable resources remaining.
223. There is limited potential for a land-won supply of aggregates from the West Midlands area. However, there is currently a land-bank of over 9 years' supply⁷⁴, well above the required figure to provide a 7 year land bank, and this has been identified as the requirement in the Plan. There are sufficient reserves of sand and gravel to enable production to continue at the level of past apportionments but no realistic prospect of increasing it in view of the constraints to mineral extraction in the area. Recycled aggregates also make an important contribution to the supply but it is unlikely that this will increase significantly over the Plan period. Nonetheless, proposed changes to the supporting text of Policy EM9 (previously EM8) are necessary to make clear that the Council will continue to work collaboratively with its neighbours to assess future supply options (**MM143**).

⁷³ Examination Document LP89

⁷⁴ Coventry City Council Statement to Hearing Session 11: Examination Document LP212

224. Mineral Safeguarding Areas (MSAs) were identified using British Geological Survey maps and industry sources and are defined on the Policies Map. Whilst the minerals resources identified in Coventry are unlikely to be worked during the Plan period, the processing of secondary and recycled aggregate material does occur. Policy EM9 thus delineates MSAs and establishing the need for safeguarding important minerals such as sand and gravel. In addition, the Council propose a new Policy EM10 to ensure that non mineral development in MSAs would not sterilise any potential future mineral extraction should this become viable and appropriate (**MM144**). It would also ensure that development proposals in MSAs would be evaluated in partnership with the Coal Authority to assess any impact from past mining.
225. The Council propose a modification to the Policies Map in order to rectify a cartographical error which omits part of the Sowe Valley from the MSA.
226. Following advice from the Coal Authority, **MM131** is necessary in order to identify the potential risks to development from past coal mining legacy in respect of unstable land.

Conclusion on Issue 9

227. Subject to the MMs identified as necessary for soundness, the Plan's policies for waste and minerals are justified and effective.

Issue 10 – Does the Plan set out effective arrangements for implementing and monitoring the achievement of its policies and proposals?

228. The Monitoring Framework sets out a series of indicators against which implementation of its policies and proposals will be measured. **MM151**⁷⁵ amends a number of these and adds new ones to ensure that monitoring will be effective. In particular, these additions include monitoring indicators for delivery of the Plan's key growth targets for housing, key infrastructure, employment land, offices and retail. The modifications include monitoring indicators to measure patronage of public transport and changes in modal share as well as the development of greenfield sites and land which had previously been designated as Green Belt.
229. The proposed amendments also relate to measuring delivery of planned housing and employment growth outside the City that is required to meet the shortfall in Coventry. Furthermore, the Monitoring Framework specifies the measures that will be taken, including early review of the Plan, in accordance with new Policy DS1 if monitoring reveals that the necessary progress is not being made.

Conclusion on Issue 10

230. I conclude that, subject to the necessary modifications, the Monitoring Framework sets out effective arrangements for implementing and monitoring the achievement of the Plan's policies and objectives.

Assessment of Legal Compliance

⁷⁵ Examination Document MOD.10

231. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Local Plan has been prepared in accordance with the Council's LDS 2015.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2012. Consultation on the Local Plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations AA Screening Report January 2016 sets out why AA is not necessary. Natural England supports this.
National Policy	The Local Plan complies with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

232. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

233. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Coventry Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

R. Phillips

Inspector

This report is accompanied by an Appendix containing the Main Modifications.



Report to Coventry City Council

by Rebecca Phillips BA(Hons) MSc DipM MRTPI MCIM

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 7 November 2017

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Coventry City Centre Area Action Plan 2011 - 2031

The Plan was submitted for examination on 1 April 2016

The examination hearing was held on 20 October 2016

File Ref: PINS/U4610/429/7

Abbreviations used in this report

AA	Appropriate Assessment
AAP	Coventry City Centre Area Action Plan
DtC	Duty to Co-operate
HER	Historic Environment Record
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LP	Local Plan
APP/MM	Main Modification
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHMA	Strategic Housing Market Assessment
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Coventry City Centre Area Action Plan provides an appropriate basis for the planning of the City centre provided that a number of main modifications [MMs] are made to it. Coventry City Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearing. Following the hearing, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- To ensure that the levels of housing, employment, offices and retail development to be provided over the period of the AAP are accurately identified and that the means to deliver the required development is clear;
- To ensure that there are effective policies to protect the historic and natural environment and open spaces;
- To ensure that there are effective policies to deal with flood risk and adaptation to climate change;
- To identify accurately the necessary transport and public realm improvements;
- To ensure that the AAP's policies are justified, effective and compliant with national policy; and
- To ensure that the policies provide a sound monitoring framework for the AAP.

Introduction

1. This report contains my assessment of the Coventry City Centre Area Action Plan (AAP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The AAP, submitted in April 2016 is the basis for my examination. It is the same document as was published for consultation in February 2015.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearing, are necessary. The MMs are referenced in bold in the report in the form **AAP/MM1, AAP/MM2, AAP/MM3** etc. and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Assessment of Duty to Co-operate

5. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
6. The AAP was submitted together with the Local Plan for examination. I deal with the assessment of the Duty to Co-operate (DtC) in my report into the soundness of the Local Plan.
7. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

8. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearing I have identified four main issues upon which the soundness of the Plan depends. Under these

headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Whether the policies for the mitigation of flood risk and adaptation to climate change and the preservation of the Historic Environment are justified and effective?

Flood Risk Mitigation and Climate Change Adaptation

9. The AAP acknowledges the cultural and historic importance of the River Sherbourne to Coventry City centre. The braided sections of the River Sherbourne and its tributaries were culverted to make way for roads and buildings. The AAP seeks to explore opportunities to de-culvert lengths of it as part of wider regeneration aspirations in the City centre. The Environment Agency (EA) says that the river is currently classed as having poor ecological status but the aspiration is that it should improve to meet good ecological status by 2027.
10. Further to the EA's advice, the Council proposes to add an additional criterion to Policy CC1 to emphasise the importance of supporting the reintroduction of green and blue infrastructure throughout the City centre and opportunities for de-culverting wherever possible (**AAP/MM12**). This is necessary to ensure that opportunities are taken to improve the River Sherbourne to support it meeting the target of good ecological potential.
11. In addition, changes to Policies CC8 and CC25 and the supporting text (**AAP/MM23**, **AAP/MM24** and **AAP/MM54**) would set out clearly that opportunities to de-culvert or "daylight" and restore the River Sherbourne and its tributaries would be supported in principle and that doing so would meet the objectives of the Severn River Basin Management Plan.
12. Further to advice from the EA, changes to Policy CC9 are necessary to emphasise that for new development, opportunities to reflect the alignment of the River Sherbourne and its tributaries should be taken (**APP/MM28**). Also, where development proposals lie adjacent to the existing de-culverted River Sherbourne that a natural sinuous river channel should be retained and that consideration should be given to removing water bodies from culverts where appropriate. This will be vital to create multi-functional green and blue spaces within the City centre (**APP/MM30**).
13. A cross reference in Policy CC9 to Policy EM5 of the Local Plan is necessary to ensure that there is a comprehensive policy framework within which to ensure that Sustainable Drainage Systems are put in place where appropriate to properly manage surface water runoff in new development (**APP/MM29**).

Historic Environment

14. Policy CC2 relates to conservation and heritage assets. **APP/MM21** changes the wording of the policy to substitute the word 'and' with 'or' would ensure that the policy is consistent with the NPPF and the statutory test¹. In addition, **APP/MM20** would provide additional supporting text, on the advice of Historic

¹ Planning (Listed Buildings and Conservation Areas) Act 1990

England, to emphasise the Council's commitment to work together with Historic England to undertake further research into the City's post-war buildings, spaces and places in order to ensure that the significance of the historic environment is appreciated and its potential is harnessed and integrated into aspirations for regenerating the City centre. This is necessary to ensure that the Plan's policies are effective.

15. This would be further supported via **APP/MM47** which would clarify in the supporting text to Policy CC14 that development proposals in the area adjoining the Civic area, in particular the historic Cathedral area to the north and primary retail area to the west, would need to give specific consideration to the Council's evolving HER to reflect the heritage and conservation value of the area.
16. **APP/MM20** would also express the Council's commitment to update its local list and continue to identify heritage assets of local importance as well as support for the centre's Heritage Action Zone status. Changes to Table 17a are necessary to ensure that the map showing the heritage assets within the PSA is accurate and includes the most up-to-date designations (**APP/MM52**). These changes are necessary to ensure that the Plan's policies are effective.
17. **APP/MM22** is necessary to ensure that the map of City centre heritage assets is correct and reflects the most up-to-date position.

Conclusion on Issue 1

18. Subject to the necessary modifications outlined above, the AAP contains sound policies to preserve the historic environment as well as to mitigate against flood risk and adapt to climate change.

Issue 2 – Whether the City Centre Area Action Plan makes appropriate provision for retail development in the City centre and whether its retail policies are justified and effective?

19. As outlined in my report into the soundness of the LP, the Council's retail strategy is underpinned by a number of studies including the City Wide Shopping and Centres study² which used data from Experian as well as primary research around shopper trends and habits in the area and a review of the retail based catchment area. The study factored in allowances for growth in market share, linked to planned improvements in the City centre as well as an allowance for e-retailing which recognises the growth in market share for internet shopping but includes the need for retail floor space with links to click and collect services.
20. It considered projections for retail needs linked to both a constrained level of housing growth and the total population growth projected for the City up to 2031. This approach reflects the joint Coventry and Warwickshire Strategic Housing Market Assessment (SHMA) work. Through consultation and its on-going DtC work, the Council has planned for the total level of retail need to meet the City's full projected population growth to 2031. This is to reflect the City centre's position as a sub-regional centre together with its accessibility

² Coventry City Wide Shopping and Centres Study NLP (2014) Examination Document LP59

and its aspirations in terms of several key regeneration schemes, such as Friargate.

21. A total of 106,834 sq m of gross retail floor space has been identified as the total requirement within the wider Coventry area over the Plan period. LP Policy R1 sets out that allocations within the City centre would support the provision of at least 70,100 sq m of retail A1 – A5 use. **APP/MM13** clarifies this and sets out the correct figures in the AAP.
22. Table 3 of the AAP sets out this total retail need in the City centre, broken down by type. Amendments to the table are necessary to provide a breakdown of convenience, comparison (A1) and other retail (A2 – A5) provision to provide the necessary clarity. The changes would also set out in a footnote that an allowance has been made in the short term projection for at least 10,000 sq m of new retail floor space at City Centre south. I return to this below. The changes to Table 3 of the AAP are set out in **APP/MM14**. The amended table would also provide additional clarity by setting out the total retail need broken down into periods – to 2021, 2021-2031 and the Plan period from 2011to 2031.
23. Table 4 of the AAP sets out the overall retail needs in Coventry from 2014 to 2031. However, for clarity, it is proposed to delete this table and incorporate a more comprehensive breakdown of retail needs over the Plan period within the adjusted Table 3 (**APP/MM50**).
24. The NPPF advises that local planning authorities should define a network and hierarchy of centres that is resilient to anticipated future economic changes³. Coventry City centre sits at the top of the Council's centres hierarchy as the main focus for comparison shopping as well as employment, leisure and entertainment. It is clear from the evidence that it is necessary to ensure that the City centre is regenerated and revitalised in order to maximise its City-wide catchment, compete with surrounding areas and support the City as a whole. Alongside the LP, the AAP contains specific policies which focus on the City centre. The Primary Shopping Area (PSA) is designated through the AAP.
25. The hierarchy is set out in LP Policy R3 which identifies Major District Centres (MDCs), District Centres (DCs) and Local Centres (LCs) which sit below the City centre. The Council's Local Centres Assessment⁴ has considered the management of the hierarchy as a whole to ensure that it supports rather than competes with the City centre. This is set out in both the LP and the AAP.
26. The Council's evidence recognises that retail and the role of town centres are changing and that there is a need for centres to diversify and bring in a greater level of leisure, tourism and entertainment uses. In view of this, the retail strategy aims to maximise flexibility in terms of how retail space is allocated. Rather than specifying A1 uses and risking higher vacancy rates, retail need has been grouped within a broader use class range (A1 – A5) to ensure that floor space is flexible and can adapt to market needs quickly.
27. The addition of the word "based" after "retail" in Policy CC12 via **APP/MM45** would clarify that whilst retail provisions are the basis of the policy and floor

³ National Planning Policy Framework paragraph 23

⁴ Local Centres Assessment (2015) Examination Document LP60

space allocations in the business area, other supporting uses (within A1 - A5) would be acceptable in principle. This would provide additional flexibility within the policy to support the Plan's objective of providing a comprehensive portfolio of retail floor space and to reflect permitted development rights.

28. A greater proportion of floor space is proposed to be allocated in the City centre – over and above the initial projections in the Shopping and Centres study. As outlined in my LP report, this reflects the Plan's retail strategy to ensure the City centre remains the focal point for new retail based investment and to support its role at the top of the hierarchy capitalising on its City-wide catchment and accessibility. It would also support the Council's regeneration objectives by focusing investment in the centre in order to benefit the City as a whole and to ensure that its role within the sub-region is not undermined. The study identifies that additional floor space could help to increase market share in the City by attracting greater footfall and opportunities to make qualitative improvements in the retail offer to meet changing demands.
29. There is adequate evidence that sufficient new retail floor space could be delivered within the City centre when developments with extant planning permission and other commitments in the area are taken into consideration. Furthermore, the proposed allocations for retail uses in other centres within the hierarchy would enable opportunities to support and complement rather than compete with the City centre.
30. The Council's retail study⁵ identified a floor space requirement of 17,667 sq m for comparison goods for the City centre. However, this requirement includes an uplift of 10,000 sq m to take into account the City Centre South scheme which was included as an existing commitment. The projections in the retail study thus identified retail floor space needs over and above that to be provided at City Centre South. Distinguishing this allowance from the rest of the identified requirement in Table 3, reflects that the scheme is a central element to the delivery of the City's retail strategy and will ensure that the contribution from this development will not be double counted when the Council allocate provisions against the overall need.
31. **APP/MM51** would add a new criterion to Policy CC18 to clarify that the PSA is expected to accommodate at least 40,000 sq m of new floor space covering a range of retail needs (A1 to A5) in accordance with Table 3 (as amended). This change would ensure that the Policy is effective.
32. The retail study identifies a need for approximately 21,800 sq m retail warehouse floor space within the wider Coventry area over the Plan period. It says that additional floor space should be accommodated within the designated centres where possible but the study also highlights the opportunities to focus retail warehouse demand towards the City centre. In line with the sequential approach in the NPPF, the Plan seeks to focus retail warehousing and the types of users that occupy these units within the City. This would also provide a potential opportunity to promote the Council's wider regeneration objectives. **APP/MM14** and **APP/MM16** clarify that included within the floor space provision up to 2031, an allowance for approximately

⁵ Coventry City Wide Shopping and Centres Study NLP (2014) Examination Document LP59

22,000 sq m of retail warehouse space which should be directed to the City centre, where appropriate.

33. A similar approach is taken with A2 provision which accounts for approximately 9,700 sq m. However, in order to be sufficiently flexible, **APP/MM16** is necessary to make clear that if it is not possible to provide new retail opportunities within the PSA or wider City centre through the sequential assessment process then the focus should be on the other centres within the hierarchy as appropriate.
34. Changes to Figure 16 via **APP/MM48** would ensure that the map includes the most up-to-date information in respect of the leisure and entertainment area of the City centre.

Conclusion on Issue 2

35. Subject to these modifications which are necessary to ensure their effectiveness, the AAP's policies for retail development in the City centre are sound.

Issue 3 – Whether the City Centre Area Action Plan's policies for enhancing accessibility are effective?

36. The AAP seeks to create a highly accessible City centre where people will find it easy to access, understand and move around in. The AAP recognises that the economic geography will change during the life of the Plan, most notably a likely increase in focus of economic activity towards southern parts of the City centre as the Friargate and Southern Precinct developments come forward. As such, the AAP says that it is essential that the City has a comprehensive integrated transport network in place to ensure new development opportunities are highly accessible making them more attractive for new business growth and well connected to other parts of the City.
37. The LP sets out how the Council will work in partnership with neighbouring local authorities, Local Enterprise Partnerships, the West Midlands Combined Authority (WMCA) and others to deliver the necessary infrastructure to support growth. The West Midlands Strategic Transport Plan sets out the overarching transport strategy for the area and the LP's policies, in particular those that support strategic connectivity such as rail, HS2 and rapid transit, are consistent with that strategy. As part of its joint working, the Council is working with Transport for the West Midlands (TfWM) - the transport arm of the WMCA - to ensure that development proposed in the LP would be taken into account when planning future public transport and network requirements.
38. Changes to the supporting text of Policy CC11 via **APP/MM32** set out how the Council is working with TfWM on the Strategic Transport Plan whilst **APP/MM33** and **APP/MM42** provide additional clarity in respect of walking and cycling routes which should be connected to new development sites and link to the existing public transport network. These changes also clarify that the pedestrian and cycle routes should connect to the public transport network and to the TfWM strategic cycle network as set out in the Strategic Transport Plan.

39. **APP/MM36** to **APP/MM39** would clarify how the Council will work with TfWM to develop the bus network and measures to support development through intelligent mobility schemes and improving the reliability of bus journey times on key routes. The MMs also set out the vision for a network of Rapid Transit routes to be fully integrated with national and regional rail services and local bus services. Further changes to the supporting text of Policy CC11 (**APP/MM35**) would place greater emphasis on the importance of rail facilities, in particular, Coventry station. These changes would set out that a master plan has been developed for the station area which will provide for improved linkages and a transport interchange linked to a new cycle parking hub.
40. **APP/MM40** refers to how consideration should be given to the parking standards in the Strategic Transport Plan in new development as well as to park and ride schemes which will support the City centre by increasing access to the metropolitan rail and rapid transit network. This would better reflect the Strategic Transport Plan.
41. Further changes to Policy CC11(**APP/MM44**) would clarify how redevelopment of listed car parks in the City centre should have regard to TfWM's parking policy objectives as well as balancing parking needs with promoting the use of public transport, cycling and walking. These changes would ensure that the Policy reflects fully the objectives of the Strategic Transport Plan. In addition, an additional criterion in part d. of the Policy would ensure that development proposals would have regard to, and where appropriate, make provision for the development of Rapid Transit (**APP/MM43**). This would also support the objectives of the LP and Strategic Transport Plan.

Conclusion on Issue 3

42. Subject to the MMs identified as necessary for soundness, the AAP's policies for transport and accessibility are justified and effective.

Issue 4 – Are the AAP policies effective and does the AAP set out effective arrangements for implementing and monitoring the achievement of its policies and proposals?

43. The LP seeks to provide at least 24,600 homes over its lifetime and sets out how this requirement will be met. Some of this new housing is proposed to be delivered within the City centre and the AAP seeks to encourage the development of more homes within the City centre. Approximately 15% of all new homes have been built in the centre in the last 10 years. Changes to Table 1 and its introductory text via **APP/MM9** and **APP/MM10** provide updated, more accurate figures in respect of the number of completions within the City centre and outside it over the last 10 years (2006/7 to 2015/16). These changes are necessary to provide the most accurate figures and to ensure that ongoing monitoring of the number of homes delivered within the City centre would be effective.
44. In addition, changes to the AAP to provide up-to-date figures for the number of completed purpose built student accommodation in the City centre would ensure that there is an accurate figure in the AAP which could be monitored effectively (**APP/MM11**). **APP/MM11** would also ensure that a more

accurate figure is shown in respect of completed conversions of offices to homes in the City centre.

45. Policy CC24 relates to the City centre's University and enterprise area and sets out requirements for development proposals in this area. Changes set out in **APP/MM53** would add clarity to the policy's requirements by confirming that high quality building(s) would be supported on land to the east of the Computer and Engineering Building on Gulson Road. Also, proposals for the Grade I listed Whitefriars Monastery should not have a detrimental impact upon the surrounding public realm (in addition to the architectural and historic interest of the building). Proposals should also respect the design unity of this part of the University and Enterprise area.
46. The Monitoring Framework sets out a series of indicators against which implementation of its policies and proposals will be measured. **APP/MMC** amends a number of these and adds new ones to ensure that monitoring will be effective. In particular, these additions include monitoring indicators for delivery of the AAP's targets for the delivery of housing, employment land, offices and retail. The modifications include monitoring indicators to measure delivery of key regeneration schemes as well as public realm projects.

Conclusion on Issue 4

47. Subject to the MMs identified as necessary, the AAP's policies are sound and there are effective arrangements for implementing and monitoring the achievement of the AAP's policies and objectives.

Assessment of Legal Compliance

48. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The City Centre Area Action Plan has been prepared in accordance with the Council's LDS 2015.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2012. Consultation on the City Centre Area Action Plan and the AAP/MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations AA Screening Report January 2016 sets out why AA is not necessary. Natural England supports this.
National Policy	The City Centre Area Action Plan complies with national policy except where indicated and AAP/MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The City Centre Area Action Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

49. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
50. The Council has requested that I recommend AAP/MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Coventry City Centre Area Action Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

R. Phillips

Inspector

This report is accompanied by an Appendix containing the Main Modifications.