



Coventry Local Plan Review

# Regulation 18: Issues and options consultation

Non-technical summary – July 2023



## Coventry Local Plan Review : a non-technical summary

### What is the Local Plan and why are we reviewing it

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

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

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

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

### How to comment

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

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

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

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

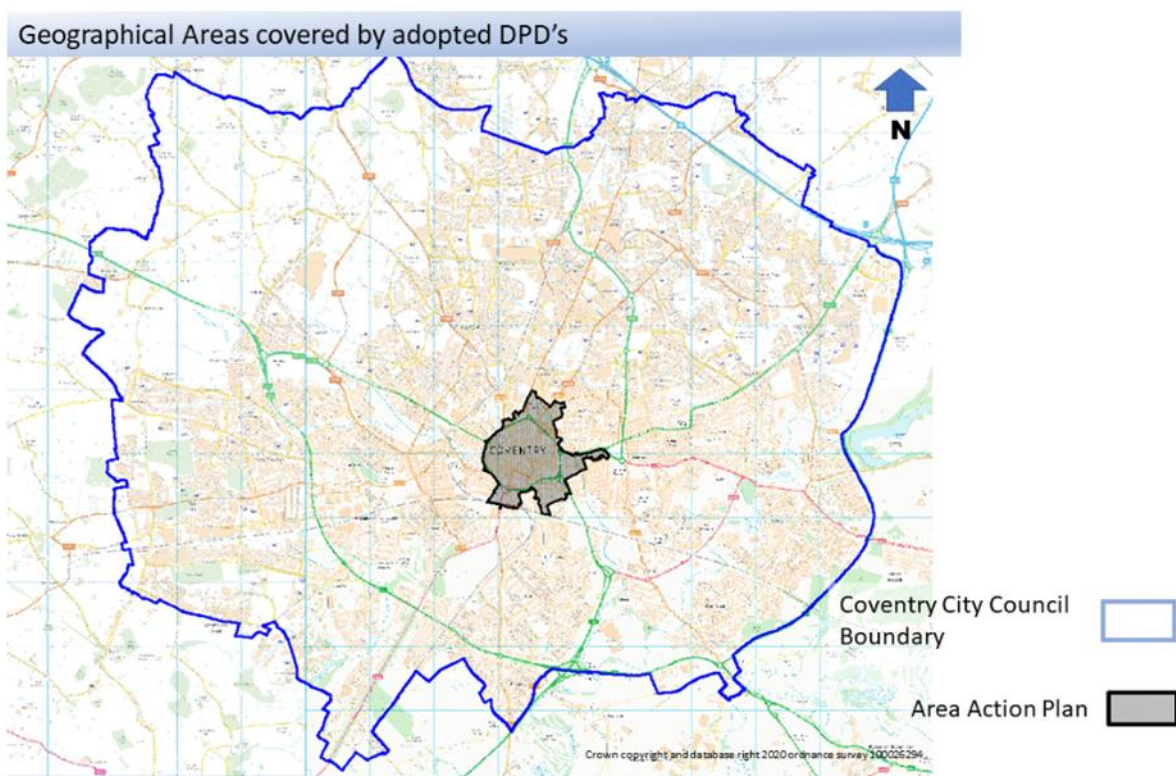
## What happens after the consultation has finished

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

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

## The area covered by the Local Plan and Area Action Plan

The map below shows the area covered by the Local Plan and the Area Action Plan



## The policy areas we are reviewing

### Health and wellbeing

At the moment the Health and Wellbeing policy is focused upon major planning applications, requiring them to consider health issues by undertaking a Health Impact assessment. We are proposing to widen out the policy so that more proposals must address health issues including the way places are designed to help people keep mentally and physically healthy and active

### Levels of growth and the Duty to Co-operate

Local Plans need to plan ahead for the amount of growth they need to accommodate and this needs to be based on up to date evidence. We have worked with our partner Local Authorities in Warwickshire as our housing and economic markets are closely linked, and we have recently published the Housing and Economic Development Needs Assessment (HEDNA) which sets out how growth should be calculated and explains this in detail.

The Government sets out how we should calculate our housing needs using the 'standard methodology'. One of the inputs to the 'standard method' uses population projections from 2014, and these have found to be inaccurate for Coventry. Using the calculation, Coventry would need to deliver 3,188 homes each year as a minimum (using 2021 as the starting point, at least 63,760 homes over the plan period to the year 2041)

Given that the 2014 population projections are wrong, we are proposing to use the more up to date 2021 Census figures in our calculation as we feel they are more accurate (this is the figure the HEDNA uses), this results in 1,964 homes a year (at least 39,280 homes over the plan period to 2041)

However, the way in which we are required to calculate our figures means that the Government adds in an 'uplift' of 35% for a number of cities of which Coventry is one. Without this 'uplift', Coventry would need to deliver at least 1,455 homes each year or 29,100 over the plan period to 2041.

We are asking for feedback on what level of growth is appropriate for the city to help us meet our needs (see the housing section), and we know we need to do further work to look at how much capacity we have (given that some of this growth is already underway).

In terms of employment the HEDNA calculates that we need to deliver around 8.5 hectares of office space, and 147.6 hectares of general industrial land over the plan period. In the employment section we suggest that we already have enough land allocated to meet this need. However, there is an emerging strategic issue regarding

the demand for modern large logistic sites which is having an impact across the west Midlands region and further evidence is being produced in conjunction with other Local Authorities on this matter to better understand the needs and where such sites should be located.

We need to ensure that we deliver growth in a sustainable way so that we balance our economic, environmental and social needs in a way that is consistent with national policy. We have a legal Duty to Co-operate with various organisations to make sure that this happens.

### Jobs and Economy

National Policy has changed in terms of the way in which 'employment' is defined and we need to make sure that our policies reflect this. We think we can strengthen our policies to help ensure that employment development takes account of and helps to address climate change including the 'green economy'.

We need to make sure that we are providing enough employment land to meet our needs.

We need to consider how we will treat planning applications for 'non employment' uses on employment land.

We need to consider how we deal with offices especially now that working patterns are changing rapidly with more remote and hybrid working.

We need to look at the needs of the storage, distribution and logistics sectors including the previously mentioned demand across the West Midlands for strategic, logistics hubs.

We need to better understand the needs of the Research and Development sector and any newly emerging sectors.

We also need to consider whether our tourism policy needs updating.

Finally we are considering whether our policy of accessibility to employment opportunities still remains up to date.

### Housing

In addition to how much growth we need, we need to consider whether we need to make any further allocations or whether we could increase the density of development in some areas to help us accommodate our growth needs in line with the national 'brownfield first' policy approach.

We are also asking if anyone has any sites they would wish to have considered to help us meet Coventry's growth needs.

We are also considering introducing new standards for housing, including new building standards to help us address climate change, standards on amenity, and

minimum size standards for dwellings in line with the Government's optional [Nationally Described Space Standards](#).

We are also considering how the plan can better support a range of new and emerging models of housing in appropriate locations, including Build to Rent purpose build housing that is 100% rented out), Co-Living (newly emerging type of accommodation with shared communal space, generally built specifically for that purpose), Custom and Self Build Housing (where individuals or groups of individuals build homes for their own occupation), and Community Led Housing (where a local community group or organisation owns, manages or stewards the homes in a manner of their choosing).

We need to update the plan to ensure that it addresses local housing need in line with Government policy and local evidence. We need to deliver a range of market and affordable products. We also need to ensure that the plan supports the positive management of our existing housing stock including how it can be adapted for better energy efficiency.

In terms of [Affordable Housing](#) (as defined by Government), policy needs updating in line with national policy but also to ensure that it addresses local need in line with the most up to date evidence including the need for social rent, and ensuring that products remain genuinely affordable.

We need to update the Gypsy and Traveller accommodation policy to reflect the latest need as defined in our latest Gypsy and Traveller Accommodation Assessment and we propose some updated criteria for assessing planning applications.

We believe we need to update the policy on Care Homes, Supported housing, Nursing Homes and older Persons Accommodation including whether we should introduce new standards and locational requirements.

In terms of residential density, our policies currently set different standards for housing outside of the ring road and those inside the ring road where a much higher level of density is applied. In order to maximise the best use of brownfield land we consider whether densities could be increased in other locations.

In relation to student accommodation, we consider how we should balance this with the range of other housing needs of the city with the growth ambitions of the universities. We also review locational issues and ask whether we should introduce standards for student accommodation to ensure it is well designed, genuinely affordable, inclusive and sustainable.

In terms of the Homes in Multiple Occupation policy we are suggesting that this may not be needed as we are producing a separate set of policies on HMOs through a new Development Plan Document.

## Retail and Centres

Many changes have taken place within the retailing sector since the adoption of the Local Plan 2017. There is now an opportunity to revise outdated retailing policies to reflect recent changes in this sector. National policy now allows much more flexibility, whereby town centre uses that would once previously have needed planning permission can now change to other uses without the need for a planning application. The aim of this was to make sure that town centres could adapt rapidly to changing economic and social circumstances. We need to make sure that our retail and town centres policies reflect national change, and consider how we review our network of centres across Coventry (City centre, major centres, district centres and local centres) to see if they still fulfil that purpose. We also need to review how we deal with proposals for town centre uses (such as retail, leisure, offices, and hotels for example) which fall outside of these boundaries, so that we are not undermining the function of our centres.

We are considering ways to update our hot food takeaway policy to make sure it complies with national policy, and which states an exclusion zone around schools (5 minutes walk time – approximately 400m).

We are also seeking ways to protect smaller shopping parades including a possible new policy which emphasises the need to consider their importance to the local community.

## Communities

We are considering whether our policies on communities need strengthening. We suggest that the definition of 'community premises' might need broadening in a way that reflects the needs of a particular community especially in terms of being able to access local services and facilities without the need for a car.

We are also suggesting that educational facilities should only be redeveloped if they are genuinely no longer needed.

We also propose that Assets of Community Value should be a [material consideration](#) when dealing with planning applications (These include buildings and land etc which are important to a local community and which are then registered as such with the Local Authority so that the community can try and raise the finance to buy the asset if it is for sale, see <https://mycommunity.org.uk/what-are-assets-of-community-value-acv> ).

We are also checking to see if people agree that our policy on [Neighbourhood Plans](#) only needs a minor update to bring it in line national policy wording. We have one 'made' (adopted) Neighbourhood Plan at Willenhall and two designated neighbourhood areas (Finham, designated in 2017 and Allesley, designated in 2016) which do not yet have Neighbourhood Plans.

## Green Belt and Green Environment

We are suggesting that our adopted policy on Green Belt needs to be updated to reflect national policy wording, and that Local Green Space needs to be a separate policy as again it is treated separately in national policy.

Current policy requires us to review Land south of Westwood Heath Road, Land south of Bishop Ullathorne School, Playing Field South of Finham Park School and Land West of Finham Primary School. This was 'safeguarded' ie removed from the Green Belt to meet longer term development needs so we need to consider whether this remains likely to be needed and further work needs to be undertaken on this issue including discussions with neighbouring councils.

In terms of our policy on Green Infrastructure, we are proposing that this needs strengthening and updating as national policy, and local priorities on climate change have changed quite a bit. We are proposing to include more reference to health and climate change issues, the importance of trees, wildlife habitats and ecosystems. We also think the policy needs updating so it links to work being done in the wider region and to ensure that our green spaces link better together. We are also proposing a series of new standards for developments, and exploring the potential to introduce the [ANGST standards](#) (Natural England standards for Accessible Natural Green Space).

We also think our policy on biodiversity needs updating to reflect changes to national policy on Biodiversity Net Gain (so that developments result in an overall increase in biodiversity of at least 10%) and on emerging proposals for Local Nature Recovery Strategies (LNRS) where Coventry will be working with neighbouring Local Authorities including the West Midlands Combined Authority.

We are also proposing to make clear that policy also relates to 'blue' infrastructure, meaning a range of water bodies eg canals, rivers, ponds etc.

We are suggesting that the plan needs to strengthen tree protection policy as it is an important part of development proposals and general planning applications, we propose that it contains requirements for considering the type of tree, how it should be planted, and a range of other requirements including increased buffer distances to protect ancient woodland.

## Design

We suggest that our current design policies are already positively written and flexible enough to be adaptable to a range of circumstances including economic trends. We think the policies could be strengthened to address the needs of an ageing population, to encourage developments to provide for a mix of generations, accommodation types and tenures as part of 'integrated neighbourhoods'.



We also propose that the policy is strengthened to recognise innovative architecture, the historic built environment and to address issues of health and wellbeing through introducing standards for open space, amenity and indoor space.

### Heritage

It is proposed to update the heritage section of the Local Plan by including the recently adopted Brownhill Green and Earlsdon Conservation Areas. It is also proposed that the plan provides sufficient flexibility to be able to support new designations and review existing ones should these be needed.

We also propose to amend the policy to directly reference [Historic England Good Practice](#) guidance.

### Archaeology

At present, archaeology is covered under heritage policy, but we suggest that it may merit a separate policy. This would provide more detail especially for areas where archaeology is especially important, and would reference good practice guidance from Historic England and standards from the [Chartered Institute for Archaeologists](#), as well as potential new and updated local evidence.

### Accessibility / transport

We think that the transport and accessibility policies need updating to reflect national policy, the Council's recently adopted [Transport Strategy](#) and the emerging [climate change strategy](#).

We think that transport policy needs to reduce dependency upon the car, with more emphasis upon walking and cycling (including cycle hire), public transport including innovation such as the electric bus and the Very Light Rail rapid transit network as well as supporting other public transport types such as rail. We also need to consider how we encourage electric vehicles, and what we should do about parking standards and how we might review these. We also need to consider including reference in policy to Mobility Credits (vouchers which residents can use to pay for various forms of sustainable travel).

In terms of freight, policy needs to reflect Government strategy which plans to decarbonise the freight industry. Where new developments are proposed to operate for 24 hours a day it is proposed to require them to provide overnight facilities such as toilets and showers. It is also suggested that developments should demonstrate that they will use only main roads and not smaller residential roads. It is proposed that 'freight consolidation centres' could be supported in appropriate locations, where goods are then distributed via smaller vehicles, keeping large HGVs out of the city centre.

## Environmental Management

We think that our policy on climate change needs revising to bring it up to date with international, national and local climate change strategy and policy. We need to set out how policy will help us achieve net zero carbon in all new developments and we think we need to include new standards for biodiversity as set out earlier in this summary. We also think we should be promoting the benefits of high density urban living with high quality design.

The Council will be developing an Adaptation and Resilience Plan for the city but we believe the [WMCA Climate Change Adaptation Plan](#) should be considered to address this issue and policy should reflect this.

The Council will also be seeking to encourage and support the development of net zero neighbourhoods and more liveable neighbourhoods designed in response to tackling the causes and consequences of climate change which could include community heat networks, provision for battery storage fed by renewable energy sources, infrastructure to support active travel modes, Electric Vehicle charging, green space, sustainable drainage, and trees to provide biodiversity, drainage and shade, alongside opportunities for community food growing. Policy needs to support this.

We currently have a policy (EM2, Building Standards) which we consider may need a total review to ensure that standards reflect the local context. Currently, our standards defer to the [Building Regulations](#) which aim to achieve zero CO2 emissions by 2050. The Building Regulations will change in 2025, bringing in the [Future Homes Standard](#). However the council wishes to set more ambitious targets and is considering what these might be and how these should be included in planning policy in a way which is realistic, viable and deliverable.

In terms of renewable energy generation we believe we need to ensure policy is updated so that it reflects national policy, supports suitable development and considers whether sites should be identified. We are also considering whether new developments should be required to include some level of renewable provision.

In relation to flood risk management including sustainable drainage systems and redevelopment of previously developed land, we think our existing policies need updating to bring them in line with the approach and direction set out in national policy and also the council's [Local Flood Risk Management Strategy](#) and [draft Climate Change Strategy](#). There is also a proposal to develop further guidance at a later stage through a Supplementary Planning Document.

In terms of air quality, we consider our current policy remains up to date as it links to our designated Air Quality Management Area however the policy could be strengthened to include reference to the [Ministerial Direction](#) for nitrogen dioxide, and also to refer to local supplementary policy.

We consider our waste management policy remains up to date There are no further plans from a waste management perspective to bring forward any sites for the

dedicated management of waste in the city. The Mixed Recycling Facility is being developed with an expected completion in summer 2023. The Council's wider Waste Strategy is still valid, and unlikely to be reviewed until the Government undertakes a review at a national level.

In terms of our minerals policies, we think these remain up to date as they accord with national policy and guidance.

### Connectivity

Our current policies on broadband, mobile internet and telecommunications are considered up to date, however they duplicate national policy and may not, therefore be needed.

We need to update our policy on Developer Contributions to remove reference to the Community Infrastructure Levy (CIL) as Coventry City Council does not use this method, however we think we need to more generally refer to 'developer contributions' as the government is proposing to reform the system but clarity on recent consultations is awaited.

We also need to update the infrastructure delivery plan – this shows how development is supported by the right infrastructure

### The Coventry City Centre Area Action Plan (AAP)

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

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

### Call for Sites

In order to accommodate development over the plan period we need to consider a range of sites and whether they may, or may not, be suitable for a proposed use.

For anyone interested in having land considered we attach a form at Appendix 1 of the main consultation document.

For more information on the Local Plan Review, and to view our consultation webpage, scan the code below.

