

Standing up for the Warwickshire Countryside

COVENTRY LOCAL PLAN MODIFICATIONS

Representations by CPRE Warwickshire Branch – 28 April 2017

The Modifications proposed by Coventry City Council are clearly shown in **green text** in the version of the Local Plan published in March 2017. References to exact Modification numbers are not simple as the Mods numbered are not set against the new or changed text and a cross-reference is needed. It is easier to refer to the page numbers and paragraph numbers in the Plan.

The following Modifications do not make the Local Plan sound as they do not meet the tests for soundness of a development plan document.

Page 15-16 (Section 1 ‘Overall levels of Growth and the Duty to Cooperate’)

(Two new passages on pages 15-16 and at middle of page 16)

The modified text is wholly wrong and unsound. The population growth in Coventry referred to is not taking place and the projection is wrong. There is no evidence to support the statement that the City’s population is to grow by in excess of 100,000 people (to 2031) with a revised housing need of 47,230. The evidence points to a far lower level of population growth and housing requirement (to meet the needs of the city) of 10,800 (perhaps 10,600). See attached, well-based evidence from Merle Gering. Please refer to the supporting data that Mr Gering attaches to his own Representation on the Modifications.

Change to Modification required: amend text to state that the housing requirement for Coventry is around 10,800 houses to 2031.

(Passage at bottom of page 16)

The (Housing) MOU is stated to be unchanged: “This MOU is unchanged following the 2014 based data as the overall needs of the HMA remain stable and continued to be planned for in a positive way”.

. This Modification is unsound. The overall needs of the HMA are not stable – the Coventry element of the household projections is grossly exaggerated and the MOU is wrong. The MOU has not been tested and no Examination to date has examined the MOU. The MOU simply accepts the false population and household projections for the city of Coventry. It does not analyse them and does not explain why they are valid.

Change to Modification required: amend text to state that the Housing MOU contains incorrect housing requirement figures, is not a development plan document, is not based on sound evidence and has not been open to representations or been examined by any Local Plan Examination. The Plan therefore gives no weight to it.

Page 19 ('Employment land needs')

The new text in green describes the 2016 'Coventry and Warwickshire Employment Land MOU'. This MOU has not been open to public consultation, and has not been examined by any Examination. It has not therefore been tested and is not reliable or sound information to use for the Local Plan.

Change to Modification required: amend text to state that the Employment Land MOU is not a development plan document, is not based on sound evidence and has not been open to representations or been examined by any Local Plan Examination, and the Plan therefore gives no weight to it.

Page 21 ('Local Plan Review')

An extensive section sets out provision for a Local Plan Review. It states, "In the event that the Plan as a whole or a key part of it becomes out of date, it will be necessary to undertake a full or partial review of the Plan."

The circumstances set out in this Modification all assume that there will need to be greater provision and the Plan will need a review for that reason. In practice the need for such a Review, if the Plan is adopted, will arise because the Plan is based on quite incorrect population and household projections for the city, which are greatly exaggerated. (See evidence submitted by Mr M Gering, attached.) The actual requirement is for much less new housing than the Plan is based on. There is no shortfall needing to be accommodated outside the boundary of Coventry.

Change to Modifications required: Amend this section to state that

- The Plan overprovides for housing and that a Review should address this overprovision
- Land not required for new housing which has been removed from the Green Belt will be returned to the Green Belt when a reduced housing requirement is established through the Review.

Page 45 (Supply of employment land)

The Modification text added states, "This level of provision both within and adjacent to Coventry also supports the Coventry and Warwickshire Employment Land MOU and the aspirations of the LEP and its Strategic Economic Plan".

The Employment Land MOU is not a development plan document, it has not been open to public consultation, and has not been examined by any Examination. It has not therefore been tested and is not reliable or sound information to use for the Local Plan.

Change to Modification required: amend text to state that the Employment Land MOU is not a development plan document, is not based on sound evidence and has not been open to

representations or been examined by any Local Plan Examination; and the Plan therefore gives no weight to it.

Page 57, Table 4.1 – ‘Housing Land Supply Components’

Table 4.1 lists both sites with planning permission and proposed site allocations (Local Plan). The Local Plan allocations are 8,290 dwellings. This includes the unjustified and unnecessary allocations of land now in the Green Belt at Keresley and Upper Eastern Green (in Allesley Parish). Deleting these two major allocations would reduce Local Plan site allocations in the line to @3,000 dwellings. The total housing supply will still be some 20,000 dwellings, in excess of the actual requirement which 10-11,000.

Conclusion

The Modifications text includes projections of population of Coventry, and a housing requirement, which are incorrect, because they are contrary to the evidence that exists at local level about the population and the housing requirement.

CPRE stresses that these Modifications published by the City Council in March 2017 are its own proposals for Modifications. They are not Modifications required by the Inspector to make the Local Plan ‘sound’. The Inspector has made no recommendations for changes to the Plan herself.

Further Examination hearings on the population and household numbers, with particular focus on the international migration and student element in the projections, are requested.

CPRE Warwickshire
28 April 2017