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COVENTRY Local Plan Review

Issues and Options Consultation

(July-September 2023)

CPRE Warwickshire Responses

The Issues and Options consultation paper is on-line, with a side-box leading to individual chapters. Questions on each chapter were set out. See it at:

<https://coventrycitycouncil.inconsult.uk/CLPRIO/viewCompoundDoc?docid=13931956>

CPRE's responses were submitted on-line on selected individual subjects on 29 September. The text was sent back to the respondent by individual email acknowledgements. These have been collated here in one Word document.

For more information see the on-line consultation paper.

QUESTION 1 Do you have any comments on our proposal to expand policy HW1 so that all major developments are required to demonstrate how health issues have been considered and addressed either within the Design and Access Statement or separate supporting health statement?

Access to green and open space: this must include the countryside within Coventry's boundary, not just open and green space within the built-up area. There is still significant open land (Green Belt) which should be included in this role.

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

QUESTION 5 Do you have any comments on the Council's view that it should be using the HEDNA figure with the 35% uplift removed to establish its local housing need?

The alternative housing need figures set out in Table 1 are all too high. The real population growth of the city as projected in 2011-14 for 2021 was greatly exaggerated as stated in this section. Of the three alternatives, only Option 3, 29,100 over the 20 years 2021-2041 is anything near realistic, and from recent data on population and household growth the figure of 29,100 houses will be too high. If the population grows by 40,000 in 2021-2041 (20 years), the housing requirement (additional dwellings needed) will be 15,000-18,000, depending on average household size.

The HEDNA published in Autumn 2022 (which covers Coventry and all five Warwickshire Districts) uses the 2021 Census information but it does not use a household projection which is sound. The 2022-based sub-national household projections by local authority area are due to be published in 2024 and these will need to be examined before a housing requirement figure can be set.

An important task which has not yet been addressed in the work on the Plan Review is the quantification of the student population of Coventry. The city has two large universities, and a significant number of students at both are foreign. They usually move to the city area for three years, sometimes two or four years, and leave again. They are generally of the ages 20-25. They have not been children in the city and will not be residents after they finish their studies. They do not form families or (generally) have any children who enter the school system. The student population produces a 'spike' in the population in the 20-25 age group; the numbers in this age-group are continually replaced but do not enter the later age-group cohorts.

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

operate QUESTION 6 Do you have any comments in relation to the alternative growth scenarios, or other options which the Council should consider?

Yes - see detailed answer to Question 5. Not repeated here.

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

operate QUESTION 7 Do you have any comments on the overall Employment Land Needs for Coventry?

There is a new WM Regional Strategic Employment Sites Study in preparation. It has not been published yet. The HEDNA work on employment land requirements uses methods which do not produce soundly-based estimates for the future, such as completions-based projections. The effect is to over-estimate needs for industrial land.

The projection of a need for 147 ha (400 acres) of new land for general industrial uses (B2, not B8) is likely to be too high. In practice most industrial land is provided by recycling existing sites with outworn buildings.

It is very important that the Plan does not propose any loss of land now Green Belt for B2 industrial use or B8 warehousing & distribution.

The 8.5 ha for B1 (office) use would generally be in the city centre. In practice there is likely to be spare B1 floorspace as firms reduce requirements with more remote working (working from home). Older office space from the 1950s-70s is likely to be redeveloped and this will be the main source of new B1 floorspace. There is unlikely to be a need to allocate new land for B1 office uses.

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

QUESTION 8 Do you have any comments on our proposed amendments to Policy DS2?

The Coventry & Warwickshire Local Enterprise Partnership (CWLEP) has been wound up and references to it in the Local Plan can be deleted. The West Midlands Combined Authority should be listed and its role set out.

Note that the WMCA's planning role is somewhat unclear; it has no statutory planning powers and does not produce any form of regional planning strategy. Unless there is a change of national planning policy that situation will continue.

Chapter 4: Jobs and Economy **QUESTION 12** Do you have any comments on our proposals to introduce a new policy which defines our definition of 'employment' for planning policy purposes?

The loss of employment sites to housing has been a common theme in many urban areas for some decades. The new Class E part G (i) to (iii) introduces scope for very light industry in residential areas, which could cause nuisance. Removal of PD rights in some situations may be necessary to protect residential areas, as well as a policy which prevents the loss of industrial land (Class B2) to residential.

Chapter 4: Jobs and Economy **QUESTION 18** Do you have any comments on our proposed changes to JE3 Part 1a?

Generally policies should resist change of use from employment land to residential as such change of use can result in proposals for new employment land on open land, sometimes countryside, We would stress that all the countryside within Coventry is in the Green Belt and no industrial allocations can or should be made on land in the Green Belt.

Chapter 5: Housing **QUESTION 28** Do you have any comments on the review of Policy H2 (Housing Allocations)?

[**QUESTION 27:** Do you have any suggestions to Policy H1 which can help us meet our housing need within our area?

1. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1 (in the online version this can also be found in 'response templates')
2. An area you think could be densified which still achieving a high standard of living? Please provide as much detail as you can
3. A site you would like us to investigate to see if it might be suitable for housing? Please provide as much detail as you can
4. Another suggestion or comment – please provide detail]

Response on Questions 27 and 28 together:

The Keresley SUE H2.01 and the Eastern Green SUE H2.02 were not justified and should not have been allocated in the 2017 Local Plan. The population and household projections for the City based on 2014 and earlier ONS projections were completely wrong, exaggerating the population of Coventry by over 30,000 when compared to the 2021 Census results. The parts of these allocations which have not been developed should be taken out of the SUE area shown on the Policies Map and returned to the Green Belt. The land was unjustifiably removed from the Green Belt in the 2017 Plan. There has been a loss of Green Belt which was quite unjustified.

Land which forms open space (even if unofficial) and allotments should not be considered for new housing.

New allocations are unlikely to be justified. The annual windfall rate to be included in Policy H1 is only 200 dwellings a year (from all sources), 3,000 in all over 15 years 2026-2041. This is low and the number of dwellings (such as by conversions) likely to be delivered per year could well be higher. The consultation paper does not state what annual windfall rate of completions has been since 2010. This needs to be stated as it may show that windfall allowance for the plan period should be higher than 200 dw/yr.

Chapter 5: Housing QUESTION 33 In relation to Policy H3 do you have any comments on our proposals to introduce specific policy which supports 'Build to Rent' in Coventry?

'Affordable housing' is not necessarily affordable; the quoted definition in the NPPF shows how wide the definition extends, making it less than useful in Local Plan policies and in planning decisions.

Build to Rent housing by contrast is what it says, and does have the capability of delivering housing which people on lower incomes can afford. A specific policy is supported.

The text of that policy needs to be published and consulted on before Regulation 19 stage. It cannot be published for the first time at the reg.19 stage as this is the submitted Local Plan to which only representations on soundness can be made. A draft Plan at Reg.18 stage is needed before Reg.19 stage is reached.

Chapter 5: Housing QUESTION 34 In relation to Policy H3 do you have any comments on our suggestion to introduce specific policy which supports Co-Living in Coventry?

This Policy H3 ('Co-Living') appears to be a policy for, or to enable, forms of student accommodation, though young workers without families also are included. If so, this is a policy which is too late to have much effect. The large numbers of student flats build in mainly tall blocks around the city centre were granted permission under existing planning policies and their management now is not going to be guided or affected by any new Planning Policy. There is already arguably over-provision of this form of accommodation; or at least the market may now be saturated. Reducing the number of HMOs may be desirable, but unless HMOs are operating without planning permission they cannot be returned to being family homes unless the owner chooses to restore them to that use.

The consultation paper states:

"It is our initial view however that properly managed co-living, as with Build to Rent, could help us retain our graduates in the city and deliver much needed homes for the younger generation, and take the pressure off the number of HMOs coming forward. Currently Coventry University has a low graduate retention rate and such provision might enable more young people to remain living and working in the city, as well as attracting other young professionals to the area."

It is not explained why graduates of the two universities should stay in the city after graduation, and why the city would wish them to do so. Generally in Britain 'home' (British) students do not wish to stay in the place where they have gone to university, and do not expect to. The statement that "Coventry University has a low graduate retention rate" presumably means that very few students graduating from it stay in the city afterwards. This statement ignores that most of its students are from overseas, come to the UK on a student visa, and have to leave the country after graduating. The City Council cannot and should not have a Local Plan policy which is attempting to encourage foreign students to stay in Coventry after graduating when these students are able to come to Britain only for the purpose of higher education and should leave the city after they have completed their studies.

Chapter 5: Housing QUESTION 36 In relation to Policy H3 do you have any comments on our proposal to introduce a policy on Custom and Self Build Housing?

A Custom and Self-Build housing policy seems unnecessary in Coventry. If people choose to build their own houses they will use an existing plot, obtain an ordinary planning permission for a new house, and demolish what is on it. Such development requires compliance with development control policies but does not need a Local Plan policy.

Custom and Self-Build Housing sites cannot and should not be proposed in the Green Belt.

The consultation paper states on residential development which already exists in the Green Belt: "in regard to the element of current policy H3 which enables limited infill

within existing ribbon developments within the Green Belt, we have found this leads to speculative developments in unsustainable locations for example isolated rural sites which are reliant on the car. We therefore propose to delete this element of policy H3...." This change in the Policy is supported, for the reason given.

Chapter 5: Housing QUESTION 42 In relation to Policy H6 we propose that the policy should be updated to reflect the Council's preference for Social Rent as opposed to Affordable Rent. Do you agree

1. Yes – please comment further if you wish
2. No – please explain

In answer to an earlier Question, support is given to the 'Build to Rent' policy. 'Social Rent' is going to be affordable for people on lower incomes. What 'Affordable Rent' means is not clear. Supporting 'Social Rent' and not 'Affordable Rent' appears sound.

Chapter 5: Housing QUESTION 49 Do you have any comments on our review of Policy H10?

This revised policy H10 appears to be an improvement on present Local Plan policies. The existing policy H10 has proved to be less than effective in controlling the spread of PBSA (short for 'Purpose-Built Student Accommodation'). The spread of tall blocks of student flats in and around the City Centre demonstrate how there was no effective policy to control their spread.

What is important is that the Local Plan's housing requirement figures separate out student accommodation (PBSA or other types) and do not count students in the projections of household numbers on which the Local Plan housing requirement is based. See earlier responses to Section 3 of the consultation paper.

Chapter 8: Green Belt and Green Environment QUESTION 71 Policy GB1 Green Belt and Local Green Space: Do you have any comments regarding Policy GB1?

The Keresley SUE H2.01 and the Eastern Green SUE H2.02 are both on land that was an important part of the Green Belt around Coventry. They were not justified and should not have been allocated in the 2017 Local Plan. The population and household projections for the City based on 2014 and earlier ONS projections were completely wrong, exaggerating the population of Coventry by over 30,000 when compared to the 2021 Census results. The parts of these allocations which have not been developed should be taken out of the SUE area shown on the Policies Map and returned to the Green Belt. The land was unjustifiably removed from the Green Belt in the 2017 Plan. There has been a loss of Green Belt which was quite unjustified.

Chapter 8: Green Belt and Green Environment QUESTION 73 Policy GB2: Safeguarded land in the Green Belt. Do you have any comments of the review of Policy GB2?

There should be no 'safeguarded land' which was land in the Green Belt. 'Safeguarded land', also known as ADR (Area of Development Restriction), was rural land which was not defined as Green Belt but to which Green Belt policies were applied. It was in theory safeguarded for possible future development but could be returned to the Green Belt if never used. In practice 'Safeguarded land' in the West Midlands Green Belt seems to have all been all lost to development since 2010 - often on appeal. It was not protected as Green Belt is, and housing requirements were judged to justify its release. This has happened in Solihull and Bromsgrove, two authorities around Birmingham, where all 'safeguarded land' has now been developed. We do not support any identification of land to be removed from the Green Belt and 'safeguarded'.

Note: Five other Questions in the series were answered with 'Yes'- not included here.