



# Coventry City Council LOCAL PLAN

Adopted 6 December 2017

# Coventry City Council

## LOCAL PLAN 2011-2031

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## List of key abbreviations

Abbreviation	Full Term
AAP	Area Action Plan
AHEVA	Affordable Housing Economic Viability Assessment
AMR	Annual Monitoring Report
CASM	Coventry Area Strategic Model
CCG	Clinical Commissioning Group
CIL	Community Infrastructure Levy
CHP	Combined Heat and Power
CWLEP	Coventry and Warwickshire Local Enterprise Partnership
DCLG	Department for Communities and Local Government
DEFRA	Department of the Environment, Food and Rural Affairs
DtC	Duty to Cooperate
EFW	Energy From Waste
HCA	Homes and Communities Agency
HIA	Health Impact Assessment
HMA	Housing Market Assessment
HRA	Habitats Regulations Assessment
ICNIRP	International Commission on Non-Ionizing Radiation Protection
IDP	Infrastructure Delivery Plan
LAA	Local Aggregate Agreement
LDO	Local Development Order
LGS	Local Green Space
LLFA	Lead Local Flood Authority
LNP	Local Nature Partnership
LNR	Local Nature Reserve
LPA	Local Planning Authority
LWS	Local Wildlife Site
MRF	Materials Recycling Facility
MoU	Memorandum of Understanding
MSA	Mineral Safeguarding Area
MSW	Municipal Solid Waste
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
OAN	Objectively Assessed Need
ONS	Office of National Statistics
PHE	Public Health England
PSN	Public Service Network
SA / SEA	Sustainability Assessment / Strategic Environmental Assessment
SCI	Statement of Community Involvement
SEP	Strategic Economic Plan
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
STW	Severn Trent Water
SUDS	Sustainable Drainage Systems
WCML	West Coast Main Line
WFD	Water Framework Directive
WWTW	Waste Water Treatment Works

# Introduction

**This Local Plan sets out Coventry's blueprint and vision to help re-establish itself as one of the country's top 10 cities, enhance its position at the centre of the Coventry and Warwickshire Sub-region and contribute towards the West Midlands engine for growth.**

The Office for National Statistics recognises Coventry as the fastest growing city outside of Greater London, with job creation continuing to grow and the city's two universities thriving. This growth builds upon decades of economic reinvention and diversification, with the city now home to Jaguar Land Rovers global headquarters as well as key head offices for Peugeot, Severn Trent and RICs.

This Plan embraces this growth and identifies land for new homes, new jobs and new retail and community uses. For the first time in over 50 years the Council is planning proactively for the removal of land from the city's Green Belt to help facilitate growth and development as well as creating high quality urban and natural environments for those wishing to live and work in Coventry. This includes two significant urban extensions to the north and west of the city.

This growth will also be supported by new, high quality infrastructure to combat congestion and transport issues, provide new high quality public green spaces, continue to invest in the city's ever-improving education system and enhance the health facilities and opportunities required to support all aspects of the city's population. Coventry is also a Gigabyte City and classed as a 'living lab' meaning it is continuing to support investment in its IT facilities and broadband connectivity as well as hosting a range of new and innovative technologies such as driverless cars.

Alongside this Local Plan, the Council will also bring forward a targeted Action Plan for its city centre, to recognise its importance as a focal point and gateway to the city. Together the plans will bring forward exciting regeneration proposals for significant new offices, retail floor space and city centre living, with the growth of the city centre being driven forward to support the wider prosperity of the city as a whole.

The Plan also offers a fantastic opportunity to exploit Coventry's historic assets, rich 20th century heritage and showpiece innovative 21st century buildings and new city centre public realm.

In addition the Council recognises that to achieve its aims and ambitions it must continue to work closely with its neighbouring authorities. Not only does this reflect the city's tight boundaries and constrained opportunities to grow within them, but also the opportunities for joint working, shared provisions of services and infrastructure and the management of strategic issues such as the long term preservation of the Meriden Gap. It also allows for the city to maximise the benefits and connectivity to the proposed HS2 interchange and supporting development at UK Central as well as continued job creation at Ansty Park, Ryton, ProLogis Keresley, University of Warwick and the planned Coventry and Warwick Gateway (including the JLR proposals at Whitley South).

## Purpose and role of the Draft Local Plan

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The Council has a statutory duty to prepare, monitor and review a Development Plan for Coventry. In accordance with national guidance and regulations a development plan can be made up of a range of documents. This document is Coventry City Council's New Local Plan. This is the foundation and most important component of the wider Development Plan which will also include:

- An Area Action Plan for the city centre;
- A Community Infrastructure Levy Charging Schedule; and
- A suite of supporting Supplementary Planning Documents.

The Local Plan has been prepared under the Planning and Compulsory Purchase Act (2004) and the Town and Country Planning Regulations (2012).

The Council's policies and proposals identified within this Local Plan are intended to support the delivery of the Council's Corporate Plan (The Council Plan) and the development of the city through to 2031. This will support its overarching aim of becoming a top 10 city again. As such, the purpose of the Local Plan is to set out the long-term spatial vision for how the city will grow, develop and change and how this vision will be delivered through a strategy for promoting, distributing and delivering sustainable development. The aims of the Council's Strategic Plan and how this Local Plan supports them is clearly set out below.

The Plan contains policies, designations and allocations which will be used to shape development and to determine planning applications.

## Background - How the Plan has been developed?

Since 2004, the Council has undertaken a range of consultation exercises on various stages of developing its Local Plan (and the Core Strategy as it was previously known). These consultations have considered all aspects of planning policy, although the fundamental focus has always been around the level of growth and how that growth is delivered. The development of the Plan has incurred numerous delays due largely to no fault of the Council. Changing national guidance and the removal of Regional Strategies have all added significant delays to the process.

The previous Coventry Development Plan was adopted in 2001, with the Regional Strategy adopted in 2004. In response to the Regional Strategy update and move towards new Regional Spatial Strategies and Local Development Frameworks, Coventry City Council started work on its first Core Strategy document in 2004 with the first consultation in 2007. The table below sets out the range of engagement activity that supported the development of this Plan.

**Table 1:** Key Dates and Engagement Events

Key Dates	Key Engagement Events
2001	Current Coventry Development Plan Adopted
2004	Work Begins on new Coventry Core Strategy
July 2007	Core Strategy: The Options
November 2008	Emerging Core Strategy - Preferred Option
March - June 2009	Core Strategy Submission Draft
June - November 2009	Regional Plan Examination and Panel Report
November 2009 - May 2010	Core Strategy Examination and Inspectors Report
July 2010	2009 Core Strategy Withdrawn
September 2011	New Proposed Core Strategy
March 2012	Housing Numbers Consultation
July - October 2012	Proposed Submission Core Strategy
December 2012 - February 2013	Core Strategy Examination and Inspector's Conclusion
March 2013	2012 Core Strategy Withdrawn
September 2014	New Local Plan – Delivering Sustainable Growth
January 2016	New Local Plan - Submission Draft
March 2017	New Local Plan – Proposed Modifications



This shows that the Council undertook numerous consultation exercises over a prolonged period of time to provide an invaluable library of evidence, views and commentary to help support the development of this new Local Plan. All community and stakeholder engagement was undertaken in accordance with the Council's adopted Statement of Community Involvement (SCI).

The Local Plan is also supported by a Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), a Habitat Regulations Assessment (HRA) and Health Impact Assessment (HIA).

In addition to public and stakeholder engagement the Local Plan has been founded on a wide range of supporting evidence documents, which have identified a host of local needs and issues that this Plan will help to meet and overcome. In addition however they have also supported the identification of a host of opportunities and aspirations which are also addressed and supported through this Plan. The full evidence underpinning this Plan's policies and proposals are set out on the Council's website and summarised alongside policies within this plan.

The abolition of the regional planning tier is of particular importance, meaning Local Planning Authorities (LPA) are no longer guided by Regional Spatial Strategies when establishing their housing requirement, but are able to identify their own housing needs for their housing market area. This must however be considered jointly with neighbouring authorities where market areas cross council boundaries. In responding to the Council's draft Core Strategy in 2013, the Inspector's commentary was clear that the Coventry Housing Market Area (HMA) covered much of Warwickshire, with a particular focus on the Local Authority areas of Warwick, Rugby and Nuneaton and Bedworth. As such, the housing needs of the HMA have been established through a range of research largely completed by the six Local Planning Authorities and GL Hearn planning consultants between 2013 and 2016.

## National Guidance

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The National Planning Policy Framework (NPPF) was published in May 2012 and replaced all existing Planning Policy Statements and Guidance (PPS and PPG). The new National Planning Practice Guidance (NPPG) was then published in March 2014 and has replaced the vast majority of supporting guidance documents and notes.

The Localism Act (2011) introduced regulations that encourage a movement away from Local Development Frameworks and Core Strategies, back towards a Local Plan type document. In simple terms this means planning policy can be focused towards a single document covering all high level policy and site allocations instead of a range of documents covering different topic areas. As such, the NPPF refers to the development of Local Plans and is clear that any additional documents should only be used where clearly justified. It is for this reason that the Council rebranded this document as the Local Plan instead of a Core Strategy. As set out above however, there will be some additional documents produced to support the delivery of more focused and detailed areas of planning policy.

Paragraph 150 of the NPPF states that "Local Plans are key to delivering sustainable development that reflects the vision and aspirations of local communities". They "must be prepared with the objective of contributing to the achievement of sustainable development" and include a "presumption in favour of sustainable development". Where appropriate the development of plans and evidence must be considered jointly with neighbouring authorities and key stakeholders. This is part of the Duty to Cooperate.

The NPPF is also clear that the Local Plan must be proactive in delivering the city's Objectively Assessed Needs for market and affordable housing, as well as the identified need for town centre uses and employment land. In doing so it must also have full regard to relevant market and economic signals through the development of a robust evidence base and subsequent policies.

The Local Plan must also ensure the natural and historic environments are protected with the plan defining the extent of the city's Green Belt.

## The Duty to Cooperate

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The Council was engaged with its neighbours and key stakeholders in an active, constructive, effective and on-going basis on a range of strategic policy issues, including, housing, employment, environmental considerations and infrastructure. Indeed, successful working under the Duty to Cooperate will not only be vital to the delivery of the plan, it will be key to ensuring the city can achieve its aims of becoming a top 10 city again and meeting its development needs.

The Council has managed key elements of the Duty to Cooperate through joint working, evidence gathering and information sharing alongside its neighbouring authorities, the Local Enterprise Partnership (LEP), the Local Nature Partnership (LNP) and other key stakeholders. Such work has included:

- Joint Strategic Housing Market Assessment (SHMA) (2013 - 2016);
- Agreed Memorandum of Understanding across Coventry and Warwickshire relating to housing requirements and employment land (2015 and 2016);
- Joint Green Belt Review (2009 and 2015);
- Strategic Flood Risk Assessment for Coventry (2015);
- Coventry Water Cycle Study (2015);
- Assessment of Employment Land Requirements for Coventry and Warwickshire (2014 and 2015);
- West Midlands Strategic Employment Land need assessment (2015);
- Local Aggregates Assessment for the West Midlands Metropolitan Authorities (2015);
- Duty to Cooperate meetings for Coventry, Solihull, Hinckley and Bosworth and the Warwickshire authorities (on-going);
- Duty to Cooperate meetings for West Midland Metropolitan Authorities (on-going);
- Quarterly meetings of the West Midlands Planning Officers Group (on-going);
- Establishment of a Coventry and Warwickshire and South East Leicestershire Joint Committee for council leaders and the LEP;
- Acceptance of City Deal and Submission of the Strategic Economic Plan (SEP) for Coventry and Warwickshire and Hinckley and Bosworth;
- Establishment of Coventry and Warwickshire Co-ordinated Monitoring Group;
- Coventry and Warwickshire Ecology and Biodiversity forum;
- West Midlands Resource Technical Advisory Body to respond to strategic waste issues;
- West Midlands Transport Officers Group;
- Establishment of the West Midlands Combined Authority; and
- 1:1 Authority engagement over strategic issues.

The Council's continued commitment to joint working and active and constructive co-operation to help ensure the successful delivery of the Local Plan is set out in Policy DS2.

## Issues and Opportunities

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Through the development of the Council's new Local Plan a range of key issues, risks, strengths and benefits were identified. These have been developed and considered through a range of evidence and consultation responses. The Local Plan therefore provides a suite of policies that seek to build upon these strengths and opportunities whilst combating the risks and issues.

Issues and Risks	Strengths and Opportunities
Substantial projected population growth	Strong working relationships with neighbouring authorities through the Duty to Cooperate
Ageing population	Substantial projected population growth
Constrained city boundaries which restrict the city's growth options	A younger population than neighbouring areas and strong growth in workforce
A skewed housing offer with a concentration towards smaller and lower value homes	Sustained period of jobs growth
Substantial growth in the private rented sector	Presence of JLR, RICS and Severn Trent headquarters
Increasing levels of in-commuting	Regeneration proposals to enhance and revitalise the city centre
Above average unemployment and worklessness	Excellent access to local services and facilities
Areas of focused deprivation and health inequalities	A strong network of centres
A need to improve employment land quality and quantum of provision	Two world class universities
Skills shortage in some key jobs growth areas	Close proximity to Birmingham International Airport and proposed HS2 interchange
Underperforming city centre and under representation of national retailers	World class sporting venues
Need to create a suitable balance between the growth of universities and their surrounding environs	High quality highway network, including direct access to the M6, M69, M40 and M42 with excellent connectivity to surrounding towns and cities
Energy Generation pressures	High quality public transport service
A need to improve air quality across the city and combat climate change	Frequent and high quality rail services to surrounding towns and city's including London in under an hour
Shortage of public green spaces in some parts of the city, especially central and northern areas	Opportunity to enhance renewable energy generation through the heat line and energy from waste facility
Localised highway congestion	Strong waste management practices
Poor levels of physical activity	Nationally strategic University hospital provision
Heritage assets at risk	'Living lab' status and a test bed for intelligent mobility
Balance the needs of public transport, cycling and walking with those of the car	Internationally renowned heritage assets and tourism features



## Vision strategy and objectives

The overarching vision of this Local Plan reflects the Council's wider corporate plan (The Council Plan).

“COVENTRY – A top ten City that is globally connected and locally committed”

This promotes Coventry as a city that is open for business and growth, providing jobs and prosperity for local people. Furthermore, the Council remains locally committed to improving the quality of life for all the city's residents, creating jobs and increasing spend power, whilst also making sure people who need support receive it when they need it.

The Council utilised a range of previous consultation activity and evidence to help formally shape the vision and objectives for Coventry moving forward. The table below helps identify those key objectives which inform and support the overarching vision. There is also clear links to the policies within the Plan to help identify how the plan supports the achievement of these objectives.

Local Plan Objectives	Sub objectives	Supporting Policies
1. Supporting businesses to grow.	<ul style="list-style-type: none"> <li>Maintaining a local economy, maximise employment opportunities and skill levels, and ensure that businesses have a range and choice of sites and premises;</li> <li>Attracting inward investment and helping business to expand; and</li> <li>Improve Coventry economy through developing a successful and diverse modern economy.</li> <li>Build on the universities as an engine for research, innovation and culture in the city.</li> </ul>	Policy DS4 Policy JE1 Policy JE1 Policy JE2 Policy JE7 Policy R1 Policy CO1 Policy CO2
2. Enabling the right infrastructure for the city to grow and thrive.	<ul style="list-style-type: none"> <li>Providing leadership to stimulate the Friargate business district; and</li> <li>Making the city more accessible for business, visitors and local people through better road, rail, bus, Rapid Transit and digital connections.</li> </ul>	Policy DS4 Policy JE1 Policy JE2 Policy JE4 Policy H2 Policy AC1 Policy AC4 Policy AC5 Policy AC6 Policy C1 Policy C2
3. Developing a dynamic 21st century city centre	<ul style="list-style-type: none"> <li>Enhancing the quality of public spaces through high quality urban and landscape design.</li> <li>Improve city centre accessibility and connectivity.</li> <li>Maximise the city's heritage assets to support growth in tourism.</li> <li>Focus on the office, retail and leisure employment generating developments within the city centre;</li> </ul>	Policy DS4 Policy DE1 Policy AC1 Policy HE2 Policy JE1 Policy R1 Policy CO1 Policy CO2

Local Plan Objectives	Sub objectives	Supporting Policies
4. Raising the profile of Coventry	<ul style="list-style-type: none"> <li>• Support Coventry to regain its status as a Top 10 city.</li> <li>• Encouraging businesses to relocate to the city;</li> <li>• Improve and diversify the city's housing offer</li> <li>• Developing economic, business and trade links with other towns and cities;</li> <li>• Promoting Coventry as a visitor destination and centre of arts &amp; culture; sports &amp; leisure; music &amp; events.</li> <li>• Reduce existing levels of unemployment.</li> <li>• Provide a high quality public transport network which integrates with walking and cycling routes</li> <li>• Support the city's two world class universities as they continue to strengthen their national and global reputation.</li> </ul>	Policy DS1 Policy H3 Policy JE1 Policy JE6 Policy JE7 Policy DS2
5. Creating an attractive, cleaner and greener city.	<ul style="list-style-type: none"> <li>• Protect and conserve the irregular pattern of the public footpath network and characteristic feature of roads and lanes.</li> <li>• To achieve a significant improvement in the quality of design, maintenance and accessibility of buildings and spaces in all parts of the city in order to provide a cleaner , sustainable and attractive built, historic and green environment.</li> <li>• Protect and enhance the city's most sensitive and highest quality green spaces.</li> </ul>	Policy GB1 Policy GE1 Policy GE2 Policy GE3 Policy GE4 Policy DE1 Policy HE1 Policy HE2
6. Maintaining and enhancing an accessible transport network.	<ul style="list-style-type: none"> <li>• Providing a transport network that enhances the city's accessibility, efficiency, safety and sustainability;</li> <li>• Continuing to improve links with the city centre and better connection to green spaces within Coventry;</li> <li>• Increasing the range of opportunities for people to access arts and culture; sports and leisure; music and events; and other activities.</li> </ul>	Policy AC1 Policy AC2 Policy AC3 Policy AC4 Policy AC5 Policy AC6
7. Housing that meets the needs of all people.	<ul style="list-style-type: none"> <li>• Improve the provision of the right quality of housing to meet the needs of the city's population.</li> <li>• Increase number of larger family homes in Coventry.</li> <li>• Promoting a high quality built environment by improving design and layout.</li> <li>• Ensure high levels of energy efficiency.</li> <li>• Ensure all housing is accessible by sustainable modes of transport.</li> </ul>	Policy H1 Policy H2 Policy H3 Policy H4 Policy H5 Policy H6 Policy H7 Policy H8 Policy H9 Policy H10 Policy H11 Policy EM1 Policy EM2 Policy EM3

Local Plan Objectives	Sub objectives	Supporting Policies
<b>8. Improve the health and wellbeing of local residents.</b>	<ul style="list-style-type: none"> <li>• Create a smoke free Coventry</li> <li>• Improve access to high quality health provisions where they are most needed.</li> <li>• Encourage healthy and active lifestyles.</li> <li>• Encouraging walking and cycling.</li> </ul>	Policy HW1 Policy AC1 Policy AC4 Policy EM1 Policy EM2 Policy EM3 Policy EM6
<b>9. Support safer communities.</b>	<ul style="list-style-type: none"> <li>• Ensuring that new developments, open spaces, residential and business areas are designed in ways that reduce the opportunities for crime.</li> <li>• Ensure high quality design also helps reduce the fear of crime.</li> </ul>	Policy DS4 Policy DE1

# 1. Overall Levels of Growth and the Duty to Cooperate

## Introduction

After a period of population decline during the 80s, 90s and early 00s Coventry is growing again and in 2015 has been identified as the fastest growing city in England outside of London. This growth is being driven by a range of factors including more people having children, longer life expectancy, more local people choosing to stay in Coventry and more people choosing to move to the city to live, work and be educated. This has seen the city demonstrate a significantly younger population profile than its Warwickshire neighbours, providing a growing employment base that will increasingly require high quality jobs, education opportunities and homes. The plan must also make provisions for the recovery in housing needs and demand following the recession at the end of the last decade. In this context it is expected that increasing numbers of young people (particularly around the 25-34 age bracket) will seek to form their own households having been forced in recent years to occupy houses in multiple occupation or remain at home with family.

As a result and having regard to the most up to date data available Coventry's population is projected to grow by in excess of 89,000 people between 2011 and 2031, with growth in the working age population of approximately 48,000 people. This results in an Objectively Assessed Need (OAN) for housing of 42,400 homes over the same period. In addition such growth also creates a need for approximately 215ha of employment land and 106,000sq.m of retail floor space. This updated assessment of need reflects:

- the Office for National Statistics (ONS) 2012 based sub-national population projections;
- the 2013 and 2014 mid-year population estimates;
- associated household projections issued by the Department for Communities and Local Government (DCLG) in 2015;
- analysis of a range of economic growth forecasts to align growth strategies;
- affordable housing needs; and
- a review of market signals and performance.

As part of the Local Plans public examination a detailed review of the 2014 based sub-national population projections (ONS), the respective household projections (DCLG) and the 2015 mid-year population estimates was undertaken. This reflected the timely release of this data during the examination process. The information was reviewed as part of a joint Coventry and Warwickshire commission and showed a continued growth in housing need in Coventry. This growth was however offset by a decrease in growth

projections for Warwickshire meaning the overall needs of the Coventry and Warwickshire Housing Market Area are actually projected to decrease by 35 homes a year. For the avoidance of doubt this assessment highlights the city's population to grow by in excess of 100,000 people with a revised housing need of 47,320. Again though, this additional growth is to be offset by a decline in growth pressure within Warwickshire. As such, the updated information has very little impact on the ability of the Local Plans for Coventry and Warwickshire to meet the needs of the HMA in accordance with national guidance. For this reason no adjustment was made to the policy structure of this Plan. Should the situation change in future years the Plan will be reviewed in accordance with Policy DS1.

## Housing Need

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The NPPF requires the development of a Strategic Housing Market Assessment (SHMA) to inform OAN for a Housing Market Area (HMA) to inform the preparation of Local Plans. In relation to Coventry this study has been undertaken jointly with the city's Warwickshire neighbours and has shown the Coventry and Warwickshire sub region to reflect a city focused HMA. The Joint SHMA (2013) as well as its 2014 and 2015 updates provide an understanding of both need and demand for market and affordable housing, whilst taking into account changes to the housing stock, market dynamics, underlying demand drivers and short and long-term drivers of change.

The Joint SHMA work has highlighted a number of potential growth options for Coventry, and highlighted the importance of the city's growth to the wider sub-region. Taking into account the requirements of the NPPF, the recommendations of the Joint SHMA work, the responses to public consultation and findings of the Sustainability Appraisal, the Council consider the city's full OAN for housing to total 42,400 homes (2,120 per annum) between 2011 and 2031, with an OAN for affordable homes of 12,000 (600 per annum), which are to be provided as a proportion of total need and from within the existing housing stock. As set out above, although the 2014 based data suggests an increase in the OAN for the city it also shows that this is more than offset by a decrease in OAN across Warwickshire. As such, the housing needs of the HMA remain stable. In this context though the city's OAN will continue to be considered as a minimum level of provision for the purposes of this Plan.

Delivering the city's housing need must however be considered within the context of deliverability, sustainable development, justifiable constraints and housing land supply. With this in mind the Council have reviewed and updated its Strategic Housing Land Availability Assessment (SHLAA) to reflect a joint methodology agreed across the HMA. This review has highlighted that the city can accommodate between 24,600 and 25,000 homes. As such, it is not possible to deliver the city's full housing needs within the city boundary and a shortfall of at least 17,800 homes exists. Even without the significant level of unmet need the annualised rate of growth projected for the city (1,230 per annum on average) continues to represent a step change in regular housing growth within Coventry. It will also represent for the first time in over 50 years that the city has seen significant expansion of its urban area.

As a result, the Council have worked openly and constructively with its neighbouring authorities to agree a Joint Memorandum of Understanding (MoU) on housing delivery (2015) to support all Local Plans for Coventry and Warwickshire. 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. At the time of writing this MoU has been endorsed by five of six authorities and seeks to demonstrate that the full needs of the HMA will be planned for over the course of the plan period. This approach has been progressed through the Duty to Cooperate (DtC) to help provide as much certainty as possible about how the city's full housing needs will be delivered. The Council recognises however that it can only go so far in this respect as it is inappropriate and beyond the powers of the Council to dictate terms and sites to other local authorities.

Notwithstanding, the Council is committed to continued and constructive engagement, through the DtC, with its Warwickshire neighbours to secure the most appropriate and sustainable locations for housing growth across the HMA. In reflection of the Warwickshire authorities supporting the delivery of the city's wider housing need, where it is shown to be desirable, appropriate, sustainable and deliverable the

Council will support its Warwickshire neighbours in bringing forward land for housing and employment that sits adjacent to the city's existing administrative boundaries. This will ensure infrastructure needs are met in full across administrative boundaries (where necessary and as appropriate) and support the continued growth of the city as the central point of the sub-region.

Having regard to this approach, the Housing chapter of this plan identifies the city's current supply pipeline as well as proposed allocations for new homes across the city. This has been set in the context of a need of at least 42,400 homes, a requirement (informed by capacity) of 24,600 and an identified shortfall of at least 17,800 homes. This unmet housing need is to be provided within Warwickshire based on an agreed redistribution mechanism.

## Employment Land Needs

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As well as providing new homes it is vitally important that the city's economy is supported and able to grow, providing new jobs and investment in to the city. For a number of years the city has lost jobs to surrounding areas and has seen important industrial land redeveloped for alternative uses. This is a trend that needs to be reversed to help Coventry return to the status of a 'top 10 city'. As a result of focused action and delivery by the Council and the Coventry and Warwickshire Local Enterprise Partnership (CWLEP) the city's decline has, in recent years, been challenged and is now being reversed. The housing pressures outlined in this report are testimony to the growing demand from people who want to live and work in the city and who are increasingly attracted to the area as a result of the resurgence of manufacturing industries in the sub-region, the success of our two world class universities and the growth in jobs across many sectors. With this in mind the Council is fully supportive of a number of economic growth projects actively on-going within, and immediately adjacent to, Coventry. These include:

- Friargate – Office led regeneration of the Coventry railway station and surrounding area
- Coventry and Warwickshire Gateway (including Whitley Business Park and Whitley South) – Significant investment in advanced manufacturing, logistics, and hi-tech research and development opportunities to the south and south east sides of the city supported by the global headquarters of JLR;
- Support for continuing expansion of both The University of Warwick and Coventry University as well as the Coventry and Warwick University Hospital;
- The occupation and potential expansion of Ansty Park to the north east of the city;
- The final completion of Ryton Park on the city's eastern boundary;
- The final completion and expansion of ProLogis Park at Keresley, which straddles the city's northern boundary;
- The continued regeneration of the employment land at Browns Lane (known as Lyons Park);
- Numerous other employment land opportunities within the existing urban area such as Parkside, Whitmore Park and Paragon Park.

Although this list helps highlight a number of strategic locations for both employment land delivery and job creation over the plan period it should not be considered exhaustive as the Council will remain committed to supporting new employment opportunities throughout the city. This is considered vitally important to reducing unemployment across the city, increasing graduate retention and continuing to support the city's increasing economic success. It is also key to ensuring the Council plays its part in delivering the ambitions and priorities of the Strategic Economic Plan (SEP).

In this context a consolidated review of the city's employment land requirements has been undertaken. This study has identified that the city's working age population is expected to grow by 47,600 people over the next 20 year period, compared to a projected growth in jobs of 18,100. This has potential implications

in terms of job opportunities, growth in economic participation and worklessness etc, but also justifies the need to focus new employment provision on and immediately around the city. This is an element of the DtC that is well established with the city's Warwickshire neighbours and has resulted in schemes such as Ansty Park and Coventry Gateway being brought forward and proposed.

To support the total level of population growth projected for Coventry the study identifies an initial need for 215ha, with a further 154ha proposed to support the loss of employment land to alternative uses and enhance the quality of the city's employment land offer.

This establishes a requirement of 369ha of B class employment land, in order to support the city's economic growth. Given the redistribution of housing into Warwickshire however, it is necessary to consider employment land needs in accordance with housing growth in order to align the housing and economic strategy of the city.

This is supported by the work undertaken by GL Hearn as well as an employment land study undertaken by CBRE on behalf of the CWLEP. This work is clear that Coventry forms the economic heartland for the sub-region. In recent years new employment developments have been brought forward and promoted in close proximity to the city boundary and have served the city's population in terms of jobs provision, but have been situated administratively within Warwickshire. The recent developments at Ryton and Ansty Park are prime examples (both situated in Rugby Borough), whilst the continued expansion of University of Warwick and the proposed development of the Gateway scheme are largely within Warwick District. The development of Pro-Logis Park at Keresley is another example straddling the boundary with Nuneaton and Bedworth. Such developments have both helped strengthen the city's position as an economic focus, but have also weakened the city itself in terms of economic investment and employment land availability. As such, a balance needs to be created through this Local Plan and the DtC to ensure the city is able to attract its own investment, support the economic growth of the sub region and enhance the city's position at the economic heart of that sub-region.

The employment chapter of this plan therefore identifies the city's current supply pipeline as well as proposed allocations for new employment land. When considered in the context of a total requirement of 369ha however there is an identified shortfall of 241ha, which is to be provided within Warwickshire but adjacent to the city boundary, principally at Ansty Park, Ryton Park and Coventry Gateway, which are actively proposed and promoted by Rugby and Warwick Councils respectively. This redistribution has been agreed through a Coventry and Warwickshire Employment Land MoU (2016). The MoU has also agreed the site opportunities referenced above, and although 2016 monitoring suggests a slight improvement in the city's employment land position, there remains a significant shortfall against the overall requirement and an on-going need for deliverable employment land across the sub-region. This also reflects the minimum nature of the requirement identified in Policy DS1.

## Retail Floor Space Needs

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Within its boundaries Coventry contains a wide range of designated centres of varying sizes and scales which support the city centre at the top of the centres hierarchy. The council's new town centre policies have been informed by a range of evidence documents, but most importantly the update to the Shopping and Centres Study completed by Nathaniel Lichfield and Partners in 2014. This study undertook an assessment of the city's retail based needs, looking at 2 levels of population growth linked to capacity and needs. The study highlights Coventry city centre as the sub-regional centre in terms of retail, but acknowledges that it has failed to 'punch its weight' in recent times and is in need of regeneration and investment. As such, the study is quite clear that comparison retail investments should, wherever possible be focused towards the city centre to help it reclaim some of its market share and improve its competitive position. Convenience retail proposals are identified as being more dispersed, with investment expected and needed in all parts of the city. For example, it is clear that the city centre continues to lack a notable convenience offer, whilst the need for a new superstore in the north west of the city will be amplified following the allocation of the two Sustainable Urban Extensions.



Having regard to the city's position at the heart of the sub-region, the regeneration opportunities within the city centre and the identification of much of Warwickshire within the Coventry retail catchment area, the Local Plan makes provisions for the city's full retail based needs. In this context a total need of 84,952sq.m of floor space is required (A1-A5 including bulky goods retail) and a further 21,882sq.m of convenience retail floor space. This totals approximately 107,000sq.m of retail based floor space. In delivering this floor space it is expected that around 20,200sq.m of comparison space will be reoccupied through existing vacant units leaving a further 86,800sq.m to be planned for.

As such, the plan makes a number of proposals to encourage sustainable retail growth across Coventry including allocating at least 70,000sq.m of retail to the city centre, the full occupation of Brandon Road centre, new centres as part of the urban extension at Eastern Green and Keresley, a refurbishment of Cannon Park and redevelopment of Riley Square at Bell Green District Centre. Detailed proposals relating to retail need and distribution are included in the shopping and centres chapter of this plan.

## Policy DS1: Overall Development Needs

1. Over the Plan period significant levels of housing, employment and retail development will be planned for and provided along with supporting infrastructure and environmental enhancements:-
  - a. A minimum of 24,600 additional homes.
  - b. A minimum of 128ha of employment land within the city's administrative boundary, including:
    - i. at least 176,000sq.m of office floor space at Friargate and the wider city centre,
    - ii. the continued expansion of Whitley Business Park; and
    - iii. 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension
  - c. 84,900sq.m gross retail based floor space (across use classes A1-A5 (including bulky goods)) and 21,900sq.m gross convenience floor space by 2031, of which at least 70,000sq.m is to be allocated to Coventry city centre.
2. Notwithstanding the above, Coventry's objectively assessed housing need for the period 2011 to 2031 is at least 42,400 additional homes and 369ha of employment land (including qualitative replacements). It is not possible to deliver all of this additional development land within the city boundary. As such, the Council will continue to work actively with neighbouring Councils through the Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Housing Market Area.
3. The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before 31st March 2021 to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on that review will commence immediately.

Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan Period in the event of one or more of the following circumstances arising: -

- a. Through the Duty to Co-operate, the unmet housing and employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;
- b. Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed;
- c. The monitoring of the Local Plan (in line with the Plan's Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan's objectives and requirements;
- d. Any other reasons that render the Plan, or part of it, significantly out of date.

## Local Plan Review

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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. Further to part 3 of Policy DS1 there are a number of factors that could render the Plan out of date:

- a.** Should one or more of the City's Warwickshire neighbours be unable to deliver the relevant proportion of the city's unmet development needs (for housing and employment as appropriate) as informed by the relevant MoU's then the city will explore all options to review its Local Plan. A failure to deliver the development needs in accordance with existing MoU's however should be evidenced by a public examination and subsequent adoption of the relevant Local Plan and have full regard to the Duty to Cooperate process.
- b.** The Coventry and Warwickshire Memorandum of Understanding (MoU) may need to be updated to reflect changing circumstances and evidence. In the event that a new or revised Memorandum of Understanding would require substantive revisions to the Local Plan proposals, then a partial or full review is likely to be necessary. However a new or revised MoU will not necessarily require a review of the Plan where the changes can be accommodated within the Plan's existing strategy.
- c.** National planning guidance is clear that updated evidence (such as new ONS population and respective household projections) will not necessarily render the Plan out of date. However where evidence signals a substantial and sustained change (either up or down) to the context of the Local Plan, this will trigger a review (partial or whole) of it.
- d.** The delivery of the Local Plan's objectives, including the overall annual housing requirement will be closely monitored. Where the Plan's proposals and policies are clearly failing to deliver the Plan's overall strategy and objectives, the Plan will require a review.

To ensure the Plan remains up to date and relevant, the Council is also committed to undertaking a comprehensive review of national policy, the regional context, updated evidence and monitoring data.

The outcomes of this review will be reported to the Council before the end of March 2021 with a clearly justified recommendation as to whether a partial or comprehensive review of the Plan is required.

During this period to 2021, the Council will also continue to work with the CWLEP and its Warwickshire neighbours to consider whether a statutory Single Spatial Strategy should be prepared to cover the HMA or part of it. In the event that the Council takes part in preparing a statutory Single Spatial Strategy, this will constitute a review of the Local Plan in accordance with this Policy.

## The Duty to Cooperate (DtC)

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The DtC is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans.

The DtC was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The DtC is not a duty to agree. Cooperation should produce effective and deliverable policies on strategic cross boundary matters. If another authority will not cooperate this should not prevent the authority bringing forward a Local Plan and submitting it for examination. However, the authority will need to submit comprehensive and robust evidence of the efforts it has made to cooperate and any outcomes achieved and this will be thoroughly tested at the examination.

Given Coventry's geographical location between the county of Warwickshire and the West Midlands Metropolitan area, the city has a DtC with the following local authorities:

- Birmingham City Council,
- Dudley Metropolitan Borough Council,

- North Warwickshire Borough Council,
- Nuneaton and Bedworth Borough Council,
- Rugby Borough Council,
- Sandwell Metropolitan Borough Council,
- Solihull Metropolitan Borough Council,
- Stratford on Avon District Council,
- Walsall Metropolitan Borough Council,
- Warwick District Council,
- Warwickshire County Council and
- Wolverhampton City Council,

In addition to Local Planning Authorities, other public bodies and organisations are subject to the DtC. These bodies are:

- each clinical commissioning group established under section 14D of the National Health Service Act 2006
- each Integrated Transport Authority
- Highways England
- Natural England
- The Civil Aviation Authority
- The Environment Agency
- The Historic Buildings and Monuments Commission for England (Historic England)
- The Homes and Communities Agency (HCA)
- The Local Enterprise Partnership (LEP) and Local Nature Partnership (LNP)
- The Office of Rail Regulation
- The National Health Service Commissioning Board

These organisations are required to cooperate with local authorities and the other prescribed bodies. These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters.

## Policy DS2: The Duty to Cooperate

1. Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.
2. In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met.
3. The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an on-going basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.
4. Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, supplementary planning documents and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.
5. Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.
6. Of particular relevance to parts 4 and 5 of this policy are the continued growth and expansion of:
  - a. Jaguar Land Rover at Whitley;
  - b. The University of Warwick;
  - c. The wider Coventry Gateway proposals;
  - d. Ansty Park;
  - e. Pro-Logis Park at Keresley; and
  - f. Proposed residential developments to the south of the city's administrative boundary.
7. The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership with the CWLEP will continue to work pro-actively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire.

## Delivering Sustainable Development

The Government expects the planning system to actively encourage growth, giving local people the opportunity to shape communities, whilst providing sufficient housing to meet local need and support economic activity. This approach is entirely consistent with the Council's vision and aspirations for Coventry. In this context, it is important that the planning system does everything possible to support economic growth and sustainable development.

The NPPF sets out the presumption in favour of sustainable development and the need for sustainable economic growth. It is also now widely recognised that Local Plans should reflect this presumption within their own policy base to promote sustainable development at the local level.

## Policy DS3: Sustainable Development Policy

1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions to enable proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, including:
  - a. access to a variety of high quality green and blue infrastructure;
  - b. access to job opportunities;
  - c. use of low carbon, renewable and energy efficient technologies;
  - d. the creation of mixed sustainable communities through a variety of dwelling types, sizes, tenures and range of community facilities
  - e. increased health, wellbeing and quality of life;
  - f. measures to adapt to the impacts of climate change;
  - g. access to sustainable modes of transport;
  - h. preservation and enhancement of the historic environment; and
  - i. sustainable waste management.
2. Planning applications that accord with the policies in the Coventry Local Plan (and, where relevant, with policies in supporting plans) will be approved without delay, unless material considerations indicate otherwise.
3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.
4. This will take into account:
  - a. Any adverse impacts of granting permission that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
  - b. Specific policies in that Framework that indicate that development should be restricted.

## Masterplan Principles

In order to support the delivery of sustainable development the importance of embedding a strong master planning framework within the Local Plan cannot be underestimated.

This policy, together with other relevant policies provides the master planning principles to guide and support landowners and developers in preparing appropriate master plans and site plans to help inform the Development Management process. It will provide an over-arching framework for the master planning of new development proposals, most notably those highlighted within policies JE2, H2 and R1 of this Local Plan. This sets out key requirements relating to land use, densities, community facilities, transportation, open spaces and phasing. Further work on the detailed master planning of areas should be carried out within this overarching context.

The guidance provided is intended to provide greater certainty to developers, the public and all other interested parties. This overarching framework should therefore set the scene for more detailed design and implementation work to follow as part of subsequent planning applications. In this context Part A of this Policy provides a general context for the master planning of sites identified within Policies JE2, H2

and R1 and any other major new developments which may emerge over the Plan period. Parts B-D relate specifically to the 3 specific allocations which the Council considers of significant strategic importance to the successful implementation of this Plan and its objectives. These sites include:

- The cross boundary employment hub at Whitley, Whitley South and Baginton Fields – totalling in excess of 83ha of employment land of which 55ha sits within Coventry's administrative boundary. The rest sits within Warwick District. The wider Whitley business park contains the global headquarters of Jaguar Land Rover with substantial parts of undeveloped land already benefitting from cross boundary planning consent to support the expansion plans of JLR and its supply chain. The relevant site allocations within this plan include JE2:3 and JE2:4.
- The Sustainable Urban Extension at Keresley – 3,100 homes, new education facilities, 2 local centres and accompanying green, blue and highway infrastructure. The relevant site allocations within this plan include H2:1 and the Keresley local centres in Policy R1.
- The Sustainable Urban Extension at Eastern Green – 2,250 homes, 15ha of employment land, a new Major District Centre, new educational facilities and accompanying green, blue and highway infrastructure. The relevant site allocations within this plan include JE2:5, H2:2 and the new Major District Centre in Policy R1.

The Council considers these sites to be of sufficient scale to warrant comprehensive consideration through a master planning process. This will form an integral part of the Development Management process (including pre-application stages) and is with a view to supporting their comprehensive delivery in a successful and sustainable way. Policy DS4 (parts A-D) therefore establish a clear set of Masterplan principles and design concepts that should form a fundamental basis for the future development of these areas.

In order to deliver the required level of growth over the Plan period, there will be a need for a range and choice of sites to be on stream over the remainder of the Plan period. The master planning approach has been adopted to carefully manage this process. Parts B-D of the policy in particular are therefore of particular importance to support the longer term phased delivery of the 3 larger development areas. In this way, each site and each phase of development can bring with it or contribute towards the necessary range of supporting infrastructure. It should be noted that the scale of strategic sites opens up the opportunity for delivering significant infrastructure benefits. However, some major elements may take a long period to deliver. Therefore, early phases will need to both deliver the infrastructure which is required for that particular phase along with contributing to the provision of wider strategic infrastructure which may be physically provided at a slightly later date. Detailed provisions will be put in place to secure delivery in such instances.

To support this, planning conditions and Planning Obligations (Section 106 Agreements and CIL) will be used in accordance with Policy IM1 to formally tie in the phased delivery of necessary supporting infrastructure with trigger mechanisms and thresholds used to ensure timely provision. This will have regard to the requirements of this Local Plan as well as supporting evidence and modelling work provided as part of the planning application.

The infrastructure provisions contained within parts B-D of Policy DS4 and the supporting policies reflect the known requirements at this time. Future updates to the IDP will allow such information to be regularly updated to reflect prevailing circumstances and show more detail when it is known. It would be premature and unhelpful to include overly prescriptive directions in the Plan relating to highly detailed matters more appropriately considered through the Development Management process. This approach is intended to provide maximum clarity without setting out unsupported aspirations.



## Policy DS4 (Part A) – General Masterplan principles

The following General Principles should be adhered to when master planning any major development proposal:

- i.** Where appropriate the Masterplan should clearly identify any phasing of development along with the timely provision of supporting infrastructure;
- ii.** Where the site is identified as an allocation within the Local Plan or City Centre AAP it should plan positively to meet in full the requirements identified within the relevant policies associated with the allocation. Where the proposal represents a phase or phases of a wider scheme however, the quantum of development should reflect the relative size and characteristics of the phase, including its position within the wider site;
- iii.** Where possible, all proposals should be planned in a comprehensive and integrated manner reflecting partnership working with relevant stakeholders. Where proposals represent a phase of a larger development the Masterplan should have full regard to any adjoining land parcels and development proposals to ensure it delivers appropriate parts of the strategic or site-wide infrastructure and other relevant features. This should support the wider delivery of the comprehensive scheme;
- iv.** Opportunities to deliver higher density residential and mixed-use development should be maximised along public transport corridors and in designated centres with lower densities provided elsewhere (in accordance with policies H9 and R3);
- v.** Employment and commercial proposals should respond positively to market demands and requirements, maximising opportunities to locate within or close to designated centres (as appropriate) and provide a range and choice of opportunities to meet business and customer needs;
- vi.** Identify appropriate highway infrastructure along with sustainable transport corridors that include the provision for integrated public transport, cycling and walking which provides excellent connectivity and linkages to within the site itself, the city centre and with the surrounding area and existing networks;
- vii.** Appropriate levels of car and cycle parking should be made in accordance with the Local Plan's parking requirements. Spaces should be well integrated within the development and laid out to ensure they do not result in the obstruction of the highway as a result of excessive on-street parking;
- viii.** Where appropriate social and community facilities should be concentrated within mixed use hubs and designated centres and easily accessed by public transport, walking and cycling (having regard to Policy CO1);
- ix.** Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1), to create new well designed developments with a distinctive character which residents will be proud of;
- x.** Features of the historic environment should be respected as part of new developments with existing heritage assets conserved and enhanced as part of development proposals (in accordance with Policy HE2). Where appropriate, this should include the setting of buildings and spaces and the restoration of assets at risk of loss;
- xi.** Sympathetically integrate existing landscape, biodiversity and historic features of the site into the development taking opportunities to protect, enhance and manage important features along with mitigation and enhancement measures to provide satisfactory compensatory provisions where appropriate (having regard to Policies GE1-4);

- xii.** Provide fully integrated, accessible and connected multi-functional green and blue infrastructure which forms strategically important links to the surrounding area to provide routes for people and wildlife and open spaces for sports, recreation and play;
- xiii.** Where appropriate incorporate innovative and creative approaches to energy generation, the provision of utilities and information technology, mitigation of pollutants, management of surface water and flood risk and waste management solutions. These should be adopted to make new developments more sustainable and resistant to the impacts of climate change; and
- xiv.** All new Masterplans should be informed by consultation with existing communities in adjoining areas. This should take place prior to the submission of a planning application to ensure feedback can influence the final proposals.

As outlined above, Parts B-D of this policy relate to the following sites:

- The Whitley employment hub (including the future expansion of JLR);
- The Keresley SUE; and
- The Eastern Green SUE.

These are considered to offer significant strategic importance to the successful delivery of the Local Plan and due to their size and nature will require a degree of comprehensive master planning:

## **Policy DS4 (Part B) - Whitley Specific Masterplan Principles**

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

- i.** Any development should support and complement the existing JLR global headquarters;
- ii.** New provision should be primarily focused within 'B class' uses (excluding B1 offices) unless they are shown to be ancillary and supportive to the overall provisions of the business park and in accordance with the other policies of this Plan;
- iii.** Support and integrate the planned highway infrastructure (as listed in the IDP) across the A45, A444 and other appropriate surrounding roads to ensure efficient and appropriate vehicle access into the site(s);
- iv.** Continue to maximise links and connectivity with surrounding business parks within both Coventry City and Warwick District to enhance the employment hub;
- v.** Expand and enhance on existing travel plans and continue to encourage excellent connectivity to public transport as well as the provision of high quality routes to support both walking and cycling;
- vi.** Enhance the connectivity of ecology and biodiversity at the Stonebridge meadows LNR and Baginton Fields nature reserve. This should include a 'green' connection into the River Sowe along the northern edge of the site and south of the A46;
- vii.** An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road;

- viii.** Development should not compromise the presence and ecological value of the River Sowe and River Sherbourne; and
- ix.** Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2;

Further to Part B of Policy DS4, further considerations may be of relevance to the wider Whitley Business Park in so far as it relates to land within Warwick District. Notwithstanding the extensive cooperation between Coventry City Council and Warwick District Council in relation to this area, it is not within the remit of this Local Plan to apply policy proposals to land outside of Coventry's administrative boundary.

## **Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles**

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

- i.** Incorporate the recommendations of the Council's SUE Design Guidance SPD;
- ii.** Ensure that the planned Local Centres are located at separate ends (north and south) in accordance with Policy R1;
- iii.** Ensure the new defensible boundaries to the Green Belt are clearly supported on the western side of the site to Tamworth Road and to the north around Thompsons Lane;
- iv.** Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall Brook. This corridor should run north-south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south east; and
- v.** Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site. This should include:
  - a.** The provision of a new Link Road in accordance with Policy H2. The Link Road should be operational to traffic prior to the full completion of all development components within the SUE;
  - b.** The delivery of the Link Road should not be to the detriment of Pro-Logis Park; and
  - c.** The management of the existing highway junctions at Bennetts Road, Tamworth Road, Fivefield Road, Sandpits Lane, Thompsons Lane, Long Lane and Watery Lane to ensure they continue to operate in a safe and appropriate way.

## Policy DS4 (Part D) – Eastern Green SUE Specific Masterplan Principles

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

- i.** Incorporate the recommendations of the Council's SUE Design Guidance SPD;
- ii.** Respond to the transport and economic opportunities associated with the site's proximity to the planned HS2 interchange to the west.
- iii.** Ensure that the employment provisions and Major District Centre are located towards the north of the site and are accessed directly from the new A45 Junction. Neither the employment provision or new Major District Centre should be occupied until the new A45 junction is fully operational;
- iv.** Furthermore, the residential element of the scheme should be limited to the occupation of no more than 250 homes until such time as the new A45 junction is fully operational, unless otherwise agreed in writing by the Council in response to a robust TA.
- v.** Ensure the new defensible boundaries to the Green Belt are clearly supported to Pickford Green Lane in the west and the A45 to the north;
- vi.** Provide appropriate green infrastructure along the western edge of the SUE around Pickford Green Lane to help blend and integrate the development into the wider Countryside;
- vii.** Establish a comprehensive green and blue infrastructure corridor focused along the Pickford Brook and its tributary. This should run from Pickford Green Lane in the west and link to existing corridors off-site, for example, across Westridge Avenue and Parkhill Drive towards Allesley Park;
- viii.** Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site;
- ix.** In accordance with Policy AC2, manage the existing highway junctions at Pickford Green Lane and Brick Hill Lane with the A45 to ensure they are either integrated into the new A45 Junction or safely retained within the existing highway network; and
- x.** Make appropriate provision to aid future integration of the new rapid transit route within the site once the final route is known.

## 2. Health and Wellbeing

### Relevant Evidence Base

- Coventry Joint Strategic Needs Assessment (2012)
- Coventry Joint Health and Wellbeing Strategy (2013)
- Indices of Multiple Deprivation (2012)

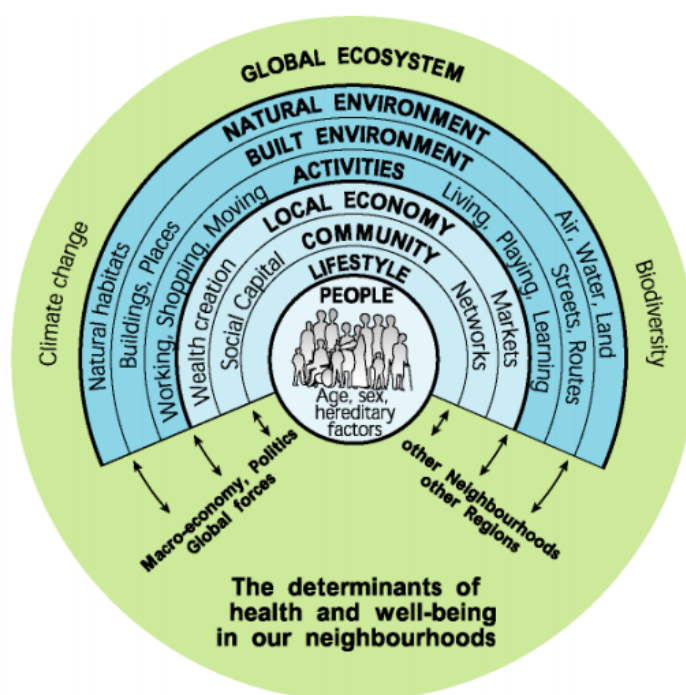
### Introduction

**This chapter sets out the policy and guidance to support the health and wellbeing of Coventry's population over the course of the plan period. It builds upon the NPPF's principle of achieving sustainable development and ensuring the health status and needs of the local population are fully understood and taken into account as part of development.**

A key role of the Local Plan is therefore to provide for development in a way that supports and encourages active and healthy lifestyles. Health and Wellbeing has been identified as a cross cutting theme across the Local Plan and supports the Council's wider agenda of improving the health and wellbeing of all people living in Coventry.

Economic, social and environmental conditions influence the health of individuals and populations and are described in the NPPF. These factors cannot always be controlled by individuals and in turn they influence and often constrain the choices we make and the lifestyle we lead. These are known as social determinants of health and determine the extent to which a person has the right physical, social and personal resources to achieve their goals, meet needs and deal with changes to their circumstances. There is a clear link between the social determinants of health and health inequalities.

These are the social, economic and environmental determinants of health as described by Barton and Grant.



Barton, H. and Grant, M. (2006) A health map for the local human habitat. The Journal for the Royal Society for the Promotion of Health, 126 (6). pp. 252-253. ISSN 1466-4240

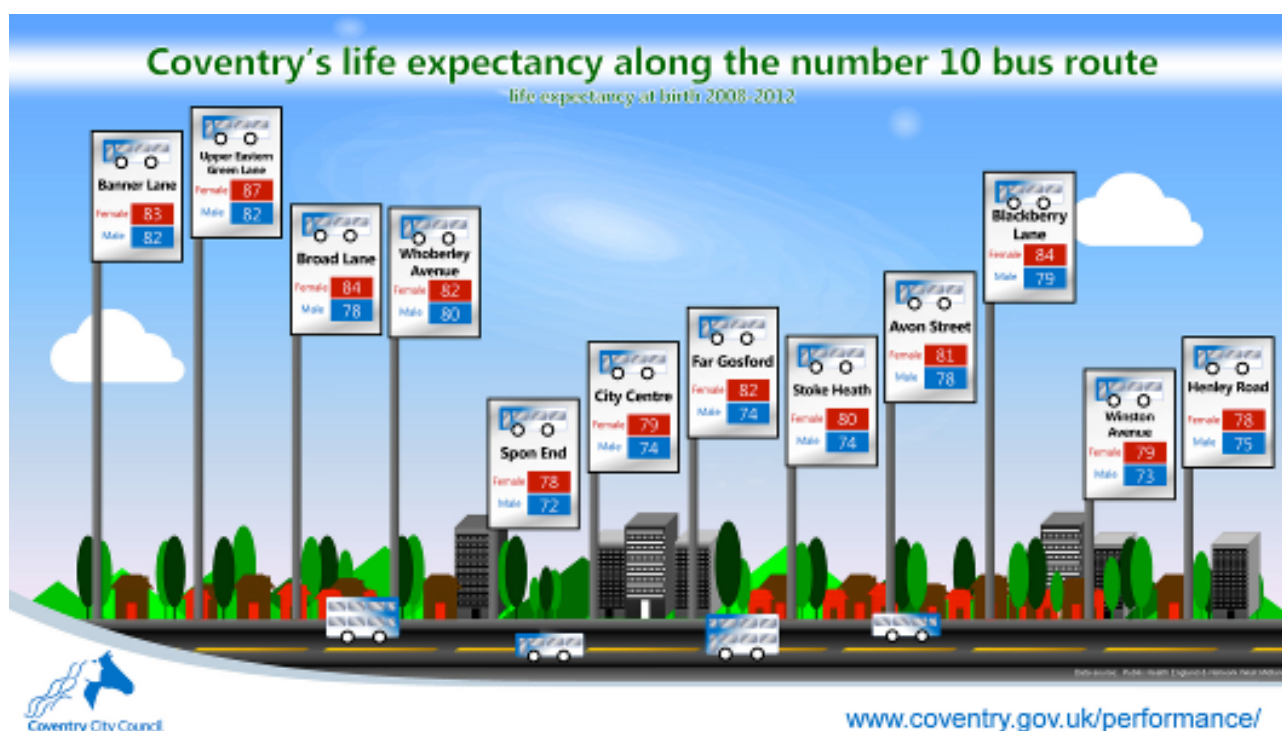
## Being a Marmot City

In April 2013, responsibilities for public health were transferred to local government providing the Council with an opportunity to broaden its ownership of the health inequalities agenda. The Council committed to delivering rapid change in health inequalities and was one of seven cities in the UK invited to participate in the UK Marmot Network and become a Marmot City.

Professor Sir Michael Marmot's 2010 report Fair Society, Healthy Lives (The Marmot Review) identified a social gradient in health. This means that those living in the most deprived neighbourhoods die earlier and spend more time in ill health than those living in the least deprived neighbourhoods.

The Marmot Review also identified that reducing health inequalities requires creating and developing healthy and sustainable places and communities which is also identified in the NPPF through its presumption in favour of sustainable development.

The people of Coventry experience high levels of inequality. Men in the most affluent areas of Coventry will live, on average 10 years longer than men in the most deprived areas. The difference in life expectancy across Coventry can be demonstrated by following the city's number 10 bus route.



Evidence demonstrates that in order to reduce such health inequalities, and accelerate improvement in health outcomes in more deprived areas, it is crucial to consider the conditions which determine health, e.g. transport, housing, employment, income, environment and community. These conditions vary drastically across the city, with the poorer neighbourhoods being more susceptible to poor health and wellbeing.



Coventry City Council has therefore adopted the following Marmot recommendations through its designation as a Marmot City:

- a.** Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by:
  - Improving active travel;
  - Improving good quality open and green spaces;
  - Improving the quality of food in local areas;
  - Improving the energy efficiency of housing.
- b.** Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each part of the city; and
- c.** Support locally developed and evidence based community regeneration programmes that:
  - Remove barriers to community participation and action;
  - Reduce social isolation.

These recommendations will be addressed throughout this Local Plan, most notably in relation to:

- Sports and physical activity;
- Provision and protection of good quality green spaces;
- Better networks for walking and cycling;
- Promotion of healthy eating;
- Energy efficient homes;
- Combatting fuel poverty;
- Facilitating jobs growth;
- Improving air quality.

## Health Impact Assessments (HIA)

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A HIA will be a useful tool in determining planning applications where there are expected to be significant impacts on health and wellbeing. They should be used to reduce adverse impacts and maximise positive impacts on health and wellbeing of the population, as well as assessing the indirect implications for the wider community. HIAs help to achieve sustainable development by finding ways to create a healthy and just society and to enhance and improve the places we live.

HIAs are usually forward looking and can be carried out at any stage in the development process, but are best undertaken at the earliest stage possible. This should ideally be prior to the submission of planning applications to ensure that health and wellbeing is considered fully at the outset. Where this is not appropriate however they should form part of the material submitted to support the relevant planning application. This can be as stand-alone assessments or as part of a wider Sustainability Appraisal (SA), Environmental Impact Assessment (EIA), or Integrated Impact Assessment (IIA).

## Policy HW1: Health Impact Assessments (HIA)

- 1.** All major development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a:
  - a.** HIA where significant impacts on health and wellbeing would arise from that proposal; or
  - b.** HIA Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing.
- 2.** All HIAs shall be undertaken in accordance with the Council's HIA Supplementary Planning Document.
- 3.** Where a development has significant negative or positive impacts on health and wellbeing the Council may require applicants to provide for the mitigation or provision of such impacts through planning conditions and/or financial/other contributions secured via planning obligations and/or the Council's CIL Charging Schedule.

An appropriately robust methodology, such as that set out in the Department for Health Guidelines for HIAs (2010), should be followed in the preparation of all HIA Screening Reports. This will include thorough consideration of the impacts of the development on the health and wellbeing of those living and working in the city and visitors to the city. These guidelines will form a platform to support the Council's HIA SPD.

All HIAs and Screening Reports should be carried out to a level of detail appropriate to the scale and type of development being proposed whilst also having regard to the surrounding area. This will be considered on a site by site basis but will need to include explicit consideration of the impacts on different groups in the population. This reflects the fact that certain groups will be potentially more vulnerable to negative impacts from development thereby impacting on health inequalities. This includes those on a low income, minority ethnic groups, young people, those with disabilities and elderly people.

To support this process the Council will develop a HIA SPD. This will also build upon the current Health Impacts Tool Kit being developed by Birmingham City Council and which is expected to be rolled out across the WMCA in 2017. The development of this toolkit to date has involved partnership working with representatives from the development industry and Public Health England (PHE). Once launched it is expected to carry with it an associated accreditation supported by PHE. In the event that this tool kit is not rolled out across the WMCA or the toolkit is shown to be inappropriate for a specific development proposal, the HIA SPD will provide guidance as to alternative tool kits that will support health considerations in new developments across Coventry.

Major development proposals in particular are more likely to have a significant impact in terms of health and wellbeing, which is recognised by national guidance. As such a HIA will be required to support developments defined as follows:

- a.** the use of land for mineral-working deposits;
- b.** waste development;
- c.** all forms of residential development where:
  - i.** the number of homes to be provided is 150 or more; or
  - ii.** the site area is 5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
- d.** all forms of urban development (not involving housing) where:
  - i.** the area of development exceeds 1ha; or
  - ii.** in the case of industrial estate development exceeds 5ha.

Notwithstanding the identified thresholds, all developments, including those below them, will be encouraged and recommended to complete the toolkit identified above and/or have full regard to how health benefits can be realised through development as part of the design process. By considering the use of this toolkit for sites below the threshold this could carry added benefit, especially within some of the city's more deprived areas where health and wellbeing concerns are more concentrated and in areas where issues are more isolated and/or related specifically to the proposed development or location of development. This process will also help in the consideration of the Local Plans policies on air quality, green spaces and active travel. Any consideration of benefits or impacts should have full regard to both the existing and new population that may live and/or work in or around the proposed site.

## 3. Jobs and Economy

### Relevant Evidence Base

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- Coventry Employment Land Study (2015) – GL Hearn
- Coventry & Warwickshire Local Enterprise Partnership (CWLEP) “Employment Land Use Study (2015) – CBRE
- Coventry City Council - A Jobs & Growth Strategy for Coventry 2014-2017
- Coventry & Warwickshire Local Enterprise Partnership “Strategic Economic Plan” (2014)
- Coventry & Warwickshire Local Enterprise Partnership “City Deal” (2013)
- “Driving Growth: Supporting Business Innovation in Coventry & Warwickshire” (2013) prepared by the Centre for Cities
- Coventry City Council “Review of Existing Employment Sites” (2012)
- Coventry City Council “Coventry’s Economy 1976 to 2026” (2008) and 2015 partial update
- Coventry City Council Social Value Policy
- Coventry City Council ‘Emerging Vision for Tourism 2014-2024
- West Midlands Strategic Employment Sites Study (2015) – PBA & JLL
- Annual Monitoring Report (2015)
- Coventry Tourism Economic Impact Assessment (2015)
- CWLEP Skills Strategy (2014)

### Introduction

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#### Economic Opportunities

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Coventry’s economic base has been diversifying over recent decades shifting away from being dominated by manufacturing which provided 55% of jobs in the 1970’s (compared to 11% of jobs now). Today the majority of jobs in Coventry are in the education (13.6%) and healthcare (13%) sectors.

Recent economic shocks have brought about many job losses in Coventry in recent decades but employment in the city grew strongly between 2010 and 2013 – from 150,900 to 156,700, an increase of 5,800. However, employment levels remain below the peaks of almost 162,000 which existed in 1990 and 2002.

These trends have driven changing needs for employment land and premises. The city has already

experienced considerable recycling of large former factories (“churn”), notably car plants and some of these have continued in employment use while others have been released in whole or part for new homes to be built.

The growth in employment and diversification of the city’s economic base is predicted to continue through the Plan period up to 2031. In particular new employment opportunities resulting from growth in the advanced manufacturing and engineering, automotive, technology and distribution/logistics sectors offer an opportunity to further increase and diversify the city’s economic base in the future. A balanced, mixed economy will require the retention and expansion of a range and choice of sites and premises.

The automotive manufacturing sector has seen much change over the last 30 years or so. Job numbers fell from a high of 12,600 in 1987 to 5,800 in 1994 and then almost doubled to 11,500 by 1999 before falling again through the 2000s. This sector is heavily influenced by the operations of a few key operators – particularly Jaguar Land Rover in Coventry. The automotive manufacturing sector has seen strong performance in recent years. This is reflected in recent job growth rates with a growth of over 1,000 jobs since 2010.

GL Hearn report in their recent Employment Land Study that the strongest employment growth over the Plan period is expected in the following sectors:

- Financial, Legal and Business Support Services – 11,100 FTE jobs;
- Education – 3,600 FTE jobs;
- Health – 3,800 FTE jobs;
- Retail Trade – 2,800 FTE jobs;
- Construction – 2,700 FTE jobs;
- Wholesale Trade – 2,600 FTE jobs; and
- Architectural and Engineering Services – 2,000 FTE jobs.

In addition GL Hearn also highlights a likely growth in the automotive manufacturing sector above the rates expected by current forecasts. This is expected to be supported by the continued investment plans of Jaguar Land Rover and the trickle down effects in the supply chain.

Therefore it is important that the location and provision of appropriate employment land is considered against future growth sectors. Much of the growth in the business support services sector (Use Class B1) could be accommodated in the Friargate redevelopment – the new City Centre Business District. Significant expansion is also envisaged by Coventry University within the city centre. Outside the city centre, office and related jobs, including the expansion of the University of Warwick and University Hospital Walsgrave, can be expected to provide significant new employment. The majority of the remainder of new jobs will be provided on ‘industrial land’ within Classes B1 (light industrial and R & D), B2 (general industrial), and B8 (storage and distribution) uses.

There are a number of existing company headquarters operations within the city and it is important that the Council supports these companies in retaining, expanding and/or relocating their headquarters operations within the city. Companies with headquarters operations within the city include Jaguar Land Rover, Peugeot/Citroen, London Taxis International, Severn Trent Water, the Skills Funding Agency and the RICS.

In particular, Jaguar Land Rover has established itself as a global business and is the UK’s largest automotive employer, creating both direct and indirect jobs across the city, sub-region and UK as a whole. Jaguar Land Rover’s existing site at Whitley Business Park is home to its global headquarters and is an advance engineer’s facility, as well as the Jaguar Design department. The site currently employs in excess of 5,200 people with this figure expected to grow substantially in the coming years as Jaguar Land Rover continues to push forward with its own expansion plans. The Council is committed to working jointly

with Jaguar Land Rover and Warwick District Council in particular to help support the planned growth of Jaguar Land Rover in the most appropriate way. This includes the Council's commitment to supporting the Whitley South proposals in Warwick District but also the allocation of land adjacent to Whitley Business Park at Baginton Fields. This site will help to create an employment hub for the south east corner of Coventry which could help support the longer term expansion of Jaguar Land Rover at Whitley, support the sustainable growth of its supply chain or provide a stand-alone inward investment opportunity.

Coventry also needs to maximise the opportunities for innovation, maintaining and strengthening links between the Universities and local businesses and business organisations, as well as the provision of a range and choice of employment sites and premises to enable businesses to remain in the city as they grow. The city has seen a significant increase in the number of businesses operating from within its administrative area – a growth of 660 businesses between 2010 and 2014, an increase of 7.1%. In particular there has been significant growth during this period in the number of businesses in the professional, scientific and technical sector (+410 or 37.8%) and the information and communication sector (+215 or 33.6%).

In terms of the tourism sector, Coventry is recognised internationally for its Cathedral. The city centre is also home to the Coventry Transport Museum, the Herbert Art Gallery and Museum, the Belgrade Theatre, the Skydome leisure complex and other buildings of historic significance. Also of importance in terms of the city's visitor economy are the two Universities, the Warwick Arts Centre and the Ricoh Arena. The CWLEP acknowledge the significance of the tourism sector to the economy of the sub-region in their Strategic Economic Plan.

Overall the Coventry area is identified by the CWLEP, in its recent SEP and City Deal, as a focus for its ambitious growth plans. These plans aim to build on the sub-region's central location, employment sites, distinctive businesses, innovation assets and highly talented workforce to ensure that the sub-region becomes a high performing economy. Such an economy will have innovative businesses which are competing internationally, growing and providing better paid employment opportunities for residents across both rural and urban areas. The CWLEP are also seeking to address the current economic inequalities between their relatively poorly performing local authority areas in the north of the sub-region (Coventry, Nuneaton & Bedworth and Rugby) and those more prosperous areas in the south (Warwick and Stratford-upon-Avon Districts).

## Economic Challenges

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Notwithstanding the economic opportunities highlighted above, Coventry also faces a number of economic challenges.

The city's population has increased substantially in recent decades (by 11.8% between 1994 and 2014) and now stands at around 337,000. Further population growth is envisaged during the plan period with provision to be made for 25,000 new dwellings within the city. Coventry also has a relatively young population with the largest age group being those in their twenties. It is therefore imperative in the interests of promoting sustainable development and minimising commuting that accessible employment opportunities are provided for this rising population.

There is also a need to improve economic productivity within the city. Productivity measured as GVA (gross value added) per head has declined in recent decades. In 1997 GVA per head in Coventry was 10.7% higher than the national average. However, by 2013 this had declined to 12.3% below the national average.

Coventry also has relatively low economic activity rates. In this regard the Office for National Statistics has published figures which show the number of jobs per person of working age. In 2013 the city had 0.78 jobs per person of working age. This compares to a figure of 0.84 for the LEP area as a whole and 0.80 for the whole of England and Wales. For its size, Coventry should have higher levels of employment. Coventry's economic activity rate of 70.3% is below the average for the CWLEP area (76%) and the national average (77.4%).

Whilst unemployment in Coventry has fallen in recent years, at 6.8% it is still above the CWLEP average of 4.2% and the national average of 6.1%.

Research contained with the CWLEP's Strategic Economic Plan shows that within Coventry there are almost 60,000 people out of work or in work with low earnings who are experiencing deprivation. By comparison Nuneaton & Bedworth and Warwick Districts have between 10,000 and 20,000 residents experiencing deprivation whilst all other Districts in the sub-region each have less than 10,000 such residents.

## Policy JE1: Overall Economy and Employment Strategy

- 1.** The Council will work positively and proactively with the business community in the city, inward investors, the city's two Universities, key public sector employers, the CWLEP and neighbouring local authorities to support sustainable economic growth and job creation. In this regard the Council will:
  - a.** Promote continued diversification of the city's economic base, particularly through supporting the expansion of companies operating in growth sectors and partnership working with the city's Universities to promote innovation;
  - b.** Ensure that job opportunities arising from employment development are accessible to all of the city's working age residents, particularly priority groups and those in the most deprived areas of the city;
  - c.** Provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period related to growth of the city's population and the pivotal role of the city in the CWLEP's ambitious growth agenda for the sub-region;
  - d.** Safeguard existing employment sites and premises from being lost to non-employment uses unless certain exceptional circumstances are demonstrated;
  - e.** Support companies, including Jaguar Land Rover, in retaining, expanding and/or relocating their headquarters operations within the city and support the provision of new infrastructure that encourages these companies to grow.
  - f.** Seek to direct office development to locations in the city centre and other defined centres with new large scale office development focused on the city centre's Friargate Business District;
  - g.** Ensure that new research and development, light industrial, general industrial and storage/distribution developments are appropriately sited and designed to maximise their accessibility by a choice of means of transport, have an acceptable impact on the highway network and to minimise the potential for environmental conflict with nearby sensitive land uses;
  - h.** Support tourism/visitor related development in respect of Coventry city centre, the Ricoh Arena and the Coventry and Warwick University Campuses.
  - i.** Support the continued growth of the city's two universities and in doing so maximise the economic development and other community benefits associated with them.



Access to a skilled labour force, particularly in growth sectors such as advanced engineering and manufacturing and the automotive industry, is currently a constraint within Coventry and the wider CWLEP area. This matter is being addressed by the CWLEP in partnership with local authorities in the sub-region through the CWLEP City Deal programme.

The Council's Jobs and Growth Strategy also highlights the need to ensure that job opportunities arising from employment development are accessible to the city's residents. In particular jobs need to be accessible to those living in the most deprived areas of the city – Foleshill, Hillfields, Spon End/Radford, Stoke Aldermoor, Willenhall, Tile Hill/Canley and Wood End/Bell Green. There is also a need to help those in priority groups into employment. These include the unemployed, those with physical and mental health problems, ex-offenders and those from troubled family backgrounds.

The employment policies in this Chapter and references to 'employment land', 'employment uses' and 'employment purposes' relate only to development falling within Use Classes B1, B2 and B8 of the Town & Country Planning Use Classes Order 1987 as amended. These comprise business offices (Use Class B1a), research and development activities (Use Class B1b), light and general industrial uses (Use Classes B1c and B2) and uses within the storage/distribution sector (Use Class B8).

## **Provision of Employment Land and Premises**

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### **Employment Land Requirements**

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Employment land should be provided to meet the needs of all employment uses – offices, research and development, light/general industrial and storage/distribution. These uses have varying land requirements. Research comprised within the evidence base identifies that office occupiers are increasingly seeking city centre locations, research and development occupiers often require sites with close links to the universities whilst industrial and storage/distribution occupiers prefer sites which have good access to the strategic highway network and are not constrained by their proximity to neighbouring sensitive land uses such as housing. Sites of varying size are also required to meet the needs of both large and small businesses.

The level of employment sites and premises required over the plan period will be driven by a range of factors. GL Hearn forecast that the housing growth proposed for the plan period will increase the city's labour force by 25,200 generating a gross employment land need for the plan period of 107ha. This figure includes a 58ha 5 year supply margin (see below).

However, in addition to this, regard also needs to be had to the pivotal role of the city in the CWLEP's ambitious growth strategy for the wider sub-region. As a consequence GL Hearn have also provided employment land demand forecasts based on recent/predicted strong performance in the three key growth sectors of financial and professional services, advanced manufacturing/engineering and logistics/distribution. Overall this forecast generates a gross need, including the 58ha 5 year supply margin (see below), for between 205 and 215ha of employment land for B Class occupiers during the Plan period 2011-2031.

GL Hearn have also provided employment land requirement figures based on the projection of past completions in respect of employment land development within the city. These projections generate need of between 210 and 231ha. The 210ha figure is based on completions over the last 10 years of 10.5ha per annum on average whilst the 231ha figure is based on average annual completions over the last 15 years of 11.6ha per annum.

Overall GL Hearn recommend that a gross employment land need of around 215ha (including the 58ha 5 year supply margin) is provided for in respect of the Plan period 2011-2031.

In order to ensure that a sufficient portfolio of employment land is available to those occupiers seeking new premises at all times throughout the plan period it is considered that a minimum reservoir of land needs to be maintained. As stated above, average completions over the last 15 years in Coventry amount to 11.6ha per annum and therefore GL Hearn recommend a 5 year 'margin' of around 58ha. This also

broadly aligns with total employment land needs for the city when it is disaggregated into 5 year blocks over the 20 year plan period.

In terms of the Coventry & Warwickshire LEP area as a whole the recent CBRE employment land use study undertaken for the CWLEP recommends that between 500 and 660ha of employment land is required up to 2031 across the sub-region in order to meet envisaged demand. They further recommend that for the purposes of planning that sites be identified that can achieve the higher end of this range. The city's employment land supply contributes towards achieving this level of growth. Work through the DtC has sought to ensure that the full level of employment land needs identified through the LEP study and local authority assessments are fully aligned with the housing needs of the sub-region.

Furthermore, consideration must also be given to other qualitative factors in determining employment land requirements. In this regard GL Hearn report that there is a considerable shortfall in the amount of B8 sites coming forward. There is also evidence of limited availability of larger plots for manufacturing activities and a need to identify land for B1 offices and research & development uses. There also remains existing capacity in relation to the city and sub-regional population/jobs growth balance as well as the promotion of above trend reductions in unemployment and deprived households (in Coventry especially) to facilitate the provision of additional employment land within the city.

With this in mind, around 64ha of industrial land across the city is identified in the city's SHLAA as potentially suitable for new housing, whilst since the start of the plan period in 2011 around 90ha of employment land on sites of over 1 hectare in size have been granted planning permission, are under construction or have been redeveloped for non-employment uses due to factors which constrain the continued use of this land for employment purposes. Therefore overall the city's existing employment land portfolio is likely to be depleted by around 154ha during the plan period. This does not reflect a lack of employment land need or demand, but reflects the locational and qualitative issues with the city's existing employment land provisions. As such, it is necessary to ensure that alternative employment sites are provided to compensate for such loss by providing high quality sites which are attractive to the market.

When considering growth needs and qualitative replacements as a whole the city's employment land requirement is 369ha.

## Employment Land Supply

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The city's employment land supply to satisfy the above-mentioned employment land requirement comprises a number of components.

These comprise firstly completions to date during the early part of the plan period during the financial years of 2011/2012 to 2015/2016. Such completions include those at the Ansty Park and Pro-Logis Ryton sites within Rugby Borough Council's administrative area because these sites lie adjacent to the city's boundary and are therefore considered to form part of the city's employment land supply. Employment land completions for this period total a little over 70ha comprising 26ha of completions on land within the city's administrative area, 30ha at Pro-Logis Ryton and 14ha at Ansty.

The next supply components comprise extant planning permissions for employment development and sites under construction. Some of the proposed employment allocations in Policy JE2 (or part thereof) also benefit from extant permissions and therefore these have been excluded from these components to avoid double counting as allocations also form part of the city's employment land supply. Bearing in mind the above, land with extant permission for B class employment uses totals 70ha comprising 17ha of land within the city's administrative boundary, 27ha at Pro-logis Ryton and 26ha at Ansty.

Finally proposed employment land allocations comprise part of the city's employment land supply. In determining which land to allocate for employment use, regard has been given to the broad requirements, as identified above, of the different types and size of employment land occupiers. Existing employment sites with extant permissions which have substantial areas of remaining land have also been assessed.

Consideration has also been given to more localised factors in determining where employment land can be allocated which has the greatest potential to generate economic growth through clustering linkages with key existing employment occupiers and proposed regional economic growth initiatives.

Bearing in mind all of the above it proposed to allocate 8 sites for employment development which in total amount to 107ha.

Firstly, 7ha of previously developed land at Friargate in Coventry city centre are allocated for B1 office development as part of an office led mixed-use redevelopment which already has planning permission. The Friargate site occupies a highly accessible location adjacent to Coventry Railway Station and is identified in the City Centre Area Action Plan as a new business district for the city centre.

The 23.5ha previously developed Lyons Park site at Coundon Wedge Drive in the north west of the city is allocated for a mix of B1, B2 and B8 uses in accordance with the extant planning permission covering this site. Construction of 5 industrial/warehouse units on 4.5ha of the site has now been completed. The remaining 19ha of the site either remains undeveloped or has commenced development in early 2017 so is subject to the allocation figure in Policy JE2.

30ha of Greenfield land at Whitley Business Park in the south east of the city are also allocated for a mix of research and development, industrial and storage/distribution uses (B1, B2 and B8) in accordance with previous planning approvals for employment development on this site. The site occupies a key location adjacent to the world headquarters of Jaguar Land Rover at Whitley. The site also lies adjacent to the A45/A46 strategic highway network. Whitley Business Park was allocated as an employment site in the 2001 Coventry Development Plan but has remained undeveloped for many years with access problems in particular being cited as a constraint to the site's development. However, the attractiveness of the site to occupiers has recently been enhanced by highway improvement works comprising a new vehicle bridge and slip roads which have significantly improved access. Detailed planning approval has recently been granted for a large B8 unit on 12ha of the site with a further 9ha of the site expected to contribute towards the growth aspirations of JLR in association with the land at Whitley South (in Warwick District).

A further 25ha of Greenfield land is allocated at Baginton Fields and South East of Whitley Business Park through removal of land from the Green Belt. It is anticipated that this site will provide further employment land for research and development, industrial and storage/distribution (B1, B2 & B8) occupiers seeking a location immediately adjacent to the A45/A46 strategic highway network and the Jaguar Land Rover World Headquarters site. Any redevelopment of this site will need to safeguard the environmentally sensitive adjacent Sowe Valley river corridor and Stonebridge Meadows Local Nature Reserve and compensatory provision will need to be provided for in respect of those parts of the site currently occupied by the King Henry VIII School playing fields.

15ha of land currently within the Green Belt are allocated adjacent to the A45 at Eastern Green on the western boundary of the city as part of a strategic urban extension which will also provide 2,250 new dwellings and a new Major District Centre. It is envisaged that the site will provide space for research and development, industrial and storage/distribution occupiers (B1, B2 & B8). The site occupies a key location on the A45 strategic highway network within a short distance of the proposed UK Central redevelopment initiative around Birmingham Airport and the NEC associated with the construction of the High Speed 2 rail link.

Finally, a further 11ha of previously developed employment land are allocated on 3 small sites within the city as part of mixed-use developments. These comprise 8ha at Whitmore Park in Holbrooks, 1.5ha at Durbar Avenue in Foleshill and 1.5ha on the Former Electric Power Station site at Aldermans Green. The last of these 3 sites already has planning permission for mixed-use redevelopment with the approved employment element providing 35 small units for light industrial and storage/distribution occupiers. Overall, it is anticipated that these sites will provide space for smaller scale research and development, industrial and storage/distribution occupiers.

The Prologis Ryton, Ansty, Lyons Park and Whitley Business Park sites referred to above are identified as strategic sites of regional significance in the West Midlands Strategic Employment Sites Study. These sites

in addition to Friargate are also referred to as strategic sites of sub-regional importance in the CWLEP Employment Land Use Study.

**Table 3.1** below provides a summary of the employment land supply components described above. It can be seen that the supply components total 248ha which relate positively towards the identified needs suggested by GL Hearn for the Plan period. 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.

**Table 3.1 – Supply Components**

Supply Components	Site Size (Ha)
Completions 2011-2016 (includes Ryton, Ansty & within Coventry)	70.3
Under Constructions in Coventry (excluding proposed allocations)	3.1
Extant Permissions in Coventry (excluding proposed allocations)	14
Extant Permissions and under constructions at Ryton & Ansty	53.4
Proposed Site Allocations*	107
Total**	247.8

\* 57.7ha of land within proposed allocated sites already benefits from planning permission for employment development.

\*\* 4.5ha of the allocated allowance at Lyons Park has been completed in 2015/16 monitoring year. This is captured in the completions row of the above table. The allocations row is reduced accordingly to avoid double counting

**Table 3.1** clearly reflects that the city cannot meet its full employment land requirement within its own boundaries. This has already been highlighted through policy DS1 and reflects the importance of the DtC in ensuring the employment land needs of the sub-region are met in full.

## Policy JE2: Provision of Employment Land and Premises

1. A total of 107ha of land are allocated for employment development within the city's administrative area. The allocations are as specified below together with details of the type of employment development that will be promoted on each of these sites.

Site Ref	Site	Ward/LPA	Area Ha (Hectares)	Employment Type
JE2:1	Friargate (part of mixed use site)	St. Michael's	7	Primarily B1a
JE2:2	Lyons Park	Bablake	19	B1, B2 & B8
JE2:3	Whitley Business Park	Cheylesmore	30	B1b&c, B2 & B8
JE2:4	Land at Baginton Fields and South East of Whitley Business Park	Cheylesmore	25	B1b&c, B2 & B8
JE2:5	A45 Eastern Green (part of mixed use site)	Bablake	15	B1b&c, B2 & B8
JE2:6	Whitmore Park (part of mixed use site)	Holbrook	8	B1b&c, B2 & B8
JE2:7	Durbar Avenue (part of mixed use site)	Foleshill	1.5	B1b&c & B8
JE2:8	Land at Aldermans Green Road and Sutton Stop (part of mixed use site)	Longford	1.5	B1c & B8
	TOTAL		107	

2. The Friargate, A45 Eastern Green, Whitmore Park, Durbar Avenue and Alderman's Green Road and Sutton Stop employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.
3. A minimum supply of new employment land on a 5 year rolling cycle of 58ha is required to be available at all times in Coventry and on sites outside but adjacent to the city's administrative boundary (the "Minimum Reservoir"). This will be achieved by using a combination of newly allocated and recycled land. A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring Report.

In terms of phasing, it is considered that the Lyons Park, Whitley Business Park and Former Electric Power Station sites will be built out in the short term as these benefit from planning permission and development has already commenced on the first two of these sites.

Construction has also commenced on the 1st phase of office development at Friargate but it is anticipated that the majority of this site will be built out in the medium term as will the majority of the other allocated sites – Land at Baginton Fields and South East of Whitley Business Park, A45 Eastern Green and Durbar Avenue which do not as yet have planning permission.

It is considered that the Whitmore Park site is likely to come forward for development towards the end of the Plan period as this site is currently occupied by an existing engineering business and substantial site preparation works would need to be undertaken in redeveloping this site.

## Non-Employment Uses on Employment Land

It is essential that a sufficient amount and range of employment land is maintained throughout the city to ensure that the city's economy continues to grow and residents have access to job opportunities. This objective is achieved in part through the allocation of land in this Plan for employment purposes and this Policy seeks firstly to protect these allocated sites from undesirable redevelopment or conversion for non-employment uses. It is also important to ensure that existing non-allocated employment sites are also retained for employment use wherever possible.

On those employment sites where this Policy applies the loss of such sites to non-employment use will not be permitted unless the exceptions criteria outlined in the Policy are satisfied. The exceptions criteria reflect advice in paragraph 22 of the NPPF.

### Policy JE3: Non-Employment Uses on Employment Land

1. Proposals for the redevelopment in whole or in part of employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where non-employment development is proposed are:
  - a. No longer suitable for employment use bearing in mind their physical characteristics, access arrangements and/or relationship to neighbouring land-uses and there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this; or
  - b. It would not be financially viable to re-use or re-develop the land or buildings on the land in whole or in part for employment purposes; or

- c.** The non-employment development proposed would be used for purposes which are clearly ancillary to and will support the operations of a primary employment use on the land; or
  - d.** The non-employment development would generate significant employment gains which are of sufficient weight to justify the loss of employment land
- 2.** In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:
  - a.** The potential of the site to contribute to the employment land requirements of the city over the plan period is not significant; and
  - b.** The proposal would not significantly compromise the viability or deliverability of other adjacent employment land or land allocated in this Plan for employment development; and
  - c.** The proposal will not have an unacceptable adverse impact on the continuing operation of any nearby existing businesses.
- 3.** Planning applications to which this Policy applies should be accompanied by written evidence to demonstrate that the proposed development satisfies the exceptions criteria highlighted above.
- 4.** This Policy applies to land which is currently in use or was last used for employment purposes unless such land has been allocated in this Plan wholly for non-employment use.

Where it is considered that a site is no longer suitable for employment use the evidence of unsuccessful active and substantial marketing of the site using a variety of media will normally need to show that such marketing has taken place for a continuous period of at least 6 months, immediately prior to the submission of any planning application for non-employment use of the site. This marketing activity should be undertaken in accordance with Appendix 2 of the Local Plan.

## Location of New Office Development

The NPPF defines office development as a main town centre use. Therefore the 'Sequential Test' applies and such development should normally be accommodated within defined centres unless it can be demonstrated that there are no sites within such centres which are suitable and available to accommodate the proposed development. If this can be demonstrated then development should be located in edge-of-centre locations where possible (i.e. within 300 metres of the boundary of a defined centre or within 500 metres of a public transport interchange) and only if no such sites are suitable and available should out-of-centre sites be considered (NPPF paragraph 24).

There is also a requirement in the NPPF (paragraph 26) for large scale office development proposals of 2,500 square metres gross or more to be accompanied by an Impact Assessment to examine whether or not the proposal is acceptable in terms of its impact on the vitality and viability of defined centres and to ensure that it does not have an adverse impact on existing, committed and planned public and private investment in office development within defined centres.



## Policy JE4: Location of Office Development

1. New office development (including change of use of buildings to provide office accommodation and the expansion of existing office uses) should normally be sited within Coventry city centre or other defined centres (as defined on the Policies Map).
2. The Friargate site within Coventry city centre is the Council's preferred location for new large scale office development. This site is allocated for primarily B1 office development under Policy JE2.
3. Proposals for new office development in other locations will only be permitted if the following criteria are satisfied:
  - a. Having regard to locational factors, there are no suitable sequentially preferable sites available within the city centre, another defined centre or in an edge-of-centre location (if no Defined Centre sites are suitable and available); or
  - b. The proposal is for small scale rural offices;
4. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:
  - a. The proposal would not have a significant adverse impact on the vitality and viability of defined centres and on existing, committed and planned public and private investment in office development within a defined centre; and
  - b. The site is accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development; and
  - c. There is good access from the development to a primary route on the highway network and an acceptable impact on the capacity of that network; and
  - d. The proposals are compatible with other Plan Policies.
5. Proposals for new office development outside of Defined Centres shall be accompanied by a Sequential Assessment and where a proposal is for 2,500 square metres (gross) or more of office floor space an Impact Assessment shall also be provided which examines the impact of the proposal on the vitality and viability of Defined Centres and its impact on existing, committed and planned public and private investment in office development within Defined Centres.

Both the Council and the CWLEP are promoting the Friargate redevelopment as the new business district for Coventry city centre. Friargate is shown on the Policies Map as lying within a defined centre and is allocated under Policy JE2 for primarily B1 office purposes. It is considered that this key site will be the focus for large scale new office development (1,000 square metres gross floor space or greater) within the city over the plan period.

It is acknowledged that in some instances it may not be possible for new office development to be located in a defined centre due to particular locational factors. However, robust justification will need to be provided to demonstrate that sequentially preferable sites are not suitable due to such locational factors. In this regard the NPPF is clear that applicants should demonstrate flexibility on issues such as format and scale and the NPPG on Ensuring the Vitality of Town Centres also states that land ownership matters are not considered to constitute robust justification.

Policy JE4 applies to both employment sites allocated in this Plan and windfall sites that may come forward for development.

## Location of New R&D, Industrial and Storage/Distribution Development

The Council's preferred location for new Research & Development (R&D), industrial and storage/distribution development are the various sites allocated for such purposes under Policy JE2.

Notwithstanding this, it is acknowledged that proposals may come forward on other non-allocated sites within the city for these uses. All R&D, industrial and storage/distribution developments on such sites should be accessible by a choice of means of transport, have an acceptable impact on the highway network and be compliant with other Plan Policies.

However, in addition it is acknowledged that significant environmental impacts can arise from general industrial and storage/distribution operations and therefore proposals for such development will also need to demonstrate that they would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution such as schools and hospitals.

The Council will also need to be satisfied that proposals on windfall sites would not compromise the viability or deliverability of land allocated in this Plan for employment development;

Overall the objective of Policy JE5 is to ensure that businesses can locate in the optimal location in terms of accessibility and minimising environmental conflicts whilst also providing residents with good access to a range of job opportunities across the city.

### Policy JE5: Location of R&D, Industrial and Storage/Distribution Development

1. The Council's preferred location for new Research & Development (R&D), industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2
2. However, proposals for new R&D, industrial and storage/distribution development (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:
  - a. Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;
  - b. Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;
  - c. The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development;
  - d. The development is compatible with other Plan Policies.
3. In addition to the above, proposals for new general industrial and storage/distribution development (including changes of use and the expansion of existing operations) on all sites (including those allocated under Policy JE2) will also be required to demonstrate that the proposed development would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution.

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## Tourism/Visitor Related Development

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The latest tourism/visitor statistics available for the city (2013) show that there were around 8.2 million visitor trips undertaken to Coventry during that year. 7.6 million of these were day trips whilst the remaining 600,000 were overnight visits. It is estimated that these visitors spent £419 million in the city and that this spend helped to support around 10,000 jobs. These figures demonstrate the significance of tourism and other visitors to the city's economic wellbeing.

The Council have recently announced their support for the city to bid for Coventry to become UK City of Culture in 2021.

The Council is also currently progressing a strategy to further promote the city's visitor economy and has published an 'Emerging Vision for Tourism' which covers the period 2014-2024.

### **The overarching vision is that:**

"By 2024 Coventry will be internationally recognised as a compelling tourism destination of distinction; renowned for the quality and depth of its visitor experience across its diverse cultural, heritage, sports and events offer. Championing a successful and thriving tourism economy, Coventry's approach will showcase effective and sustainable partnership working that combines to provide a rich and captivating experience, increasing visitor levels, spend and ultimately jobs."

### **Key objectives outlined in the emerging vision document are as follows:**

1. Change the negative perceptions of Coventry, locally, nationally and internationally to that of a city which offers a vibrant, diverse and quality experience and that is open for business.
2. Strengthening the city's heritage and culture offer.
3. Securing major conferences and exhibitions at venues within the city.
4. Attract, secure and maintain a regular high profile events programme for the city.
5. Attract high profile sporting events; and
6. Retain within the city a greater number of those graduating from the city's universities.

Overall the Council is aiming to increase total visitor trips to Coventry to 9,000,000 by 2024, an increase of around 10% on the visitor numbers recorded in 2013 with a corresponding 7% increase in annual visitor spend to £447 million.

The 'Emerging Vision for Tourism' document identifies in particular the significance of Coventry city centre, the Ricoh Arena and the Coventry and Warwick University campuses as destinations within the city for tourists and visitors.

Policy JE6 therefore seeks to support proposals for tourism/visitor related development in or adjacent to the above locations subject to compatibility with other Plan Policies. Tourism/visitor related development such as hotels, conference facilities and leisure/recreation schemes which are classified by the NPPF as Main Town Centre Uses will also need to satisfy the Sequential and, where appropriate, Impact Tests laid down in national guidance.

## Policy JE6: Tourism/Visitor Related Development

1. Proposals for development within Coventry city centre (as defined on the Policies Map) or on sites at or adjacent to the Ricoh Arena or the Coventry and Warwick University campuses which would contribute towards the city's role as a tourist destination will be supported subject to compatibility with other Plan Policies.

## Accessibility to Employment Opportunities

Both CWLEP policy at the sub-regional level and Council documents including the Coventry Social Value Policy and Jobs & Growth Strategy emphasise the need to ensure that new employment opportunities are accessible to the city's residents, particularly priority groups and those in the most deprived areas of the city.

As stated earlier in this Chapter unemployment within the city remains above the CWLEP and national averages and there are high levels of deprivation in numerical terms amongst those out of work or in work with low earnings.

In accordance with the CWLEP's City Deal it is also a priority to ensure that training is provided which meets the specific needs of businesses in the identified growth sectors.

Within the West Midlands Integrated Transport Authority's Strategic Transport Plan, there are a number of policies promoting 'Economic Growth and Economic Inclusion'. These promote improvements in transport infrastructure including Rapid Transit, improved bus services and enhanced walking and cycling measures, alongside policies to improve junction pinch points. Investments in such infrastructure are considered throughout this Plan and will serve new employment sites, to enable new travel demands to be met successfully through sustainable forms of travel. As such, new development must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks. Sustainable travel improvements will then allow employment sites to be developed, enabling new travel demand to be met by sustainable forms of travel.

## Policy JE7: Accessibility to Employment Opportunities

1. Planning applications for new employment development (including changes of use and the expansion of existing operations) will be required to demonstrate how job opportunities arising from the proposed development will be made accessible to the city's residents, particularly those in the most deprived areas of the city and priority groups. In this regard applicants will be expected to give consideration to a range of measures including:
  - a. enhancement of the accessibility of the development to residents by a choice of means of transport;
  - b. developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks.
  - c. the provision of support to residents in applying for jobs arising from the development;
  - d. the provision of training opportunities to assist residents in accessing employment opportunities;
  - e. childcare provision which enables residents to access employment opportunities; and/or
  - f. measures to assist those with physical or mental health disabilities to access employment opportunities.
2. In respect of planning applications for new employment development the Council may require applicants to make financial or other contributions secured through planning obligations or its CIL Charging Schedule to maximise the accessibility of job opportunities to the city's residents.

There are several dimensions to improving the accessibility of job opportunities to local residents. Firstly, it may be necessary for improvements to public transport infrastructure and services to be funded and better facilities for pedestrians and cyclists to be provided to ensure that residents are able to travel to/from work within a reasonable timescale.

Support may also need to be provided to assist residents, particularly those from disadvantaged groups or areas in applying for new jobs and to receive training that will assist them in accessing employment opportunities. Childcare provision may also assist in enhancing access to employment and individuals with physical or mental health difficulties may require support to access jobs.

The extent and nature of measures proposed to enhance accessibility to employment opportunities will vary dependent upon the scale and type of employment development proposed. For certain employment developments, in particular major developments (i.e. those for 1,000 square metres or more of gross floor space or proposals for development on sites of 1ha or more) the Council may require applicants to make financial or other contributions to employment accessibility measures with these to be secured through planning obligations or the City's CIL Charging Schedule, although regard will be had to financial viability considerations and other infrastructure requirements in determining the level of any contributions.

## 4. Delivering Coventry's Housing Needs

### Relevant Evidence Base

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- Strategic Housing Land Availability Assessment (SHLAA) (2015);
- Coventry Strategic Housing Market Assessment (SHMA) (2012);
- Coventry and Warwickshire Strategic Housing Market Assessment (2013) (SHMA)
- Coventry and Warwickshire SHMA (2014 Annex and 2015 update)
- Coventry Housing and Homelessness Strategy 2013-2018 (2013)
- Affordable Housing Economic Viability Assessment (AHEVA) (2012);
- Coventry Gypsy and Traveller Accommodation Assessment (2015);
- Coventry Older Persons Housing Strategy (2008)
- Student Accommodation Study (2005);
- Student population Information Note (2015)
- Annual Monitoring Report (2015)
- Density of Development Assessment (2015)
- Small Site Windfall Allowance (2015)
- Supplementary Housing Evidence Paper (2015)
- Coventry and Warwickshire Memorandum of Understanding on Housing Delivery (2015)

## Introduction

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**Since 2010 the rate of annual net completions in Coventry has been increasing year on year, with completions over the last 5 years averaging 986 homes per annum. This compares to the average rate of 681 homes a year between 2001 and 2011 and just 564 homes a year on average dating back to 1991.**

The level of net completions has been influenced by significant levels of demolition arising from urban regeneration throughout the city. This was particularly prominent between 2002 and 2006, where on average; more than 300 dwellings per annum were being demolished. Since 2006 however the annual average has dropped to approximately 79 dwellings. This has largely been reflective of the development programmes within the regeneration areas, where houses have been retained in the short term to meet housing need and new homes have been built on sites that were cleared in previous years. The level of urban regeneration proposed by this Local Plan will see a continuation of demolition, especially within the areas of Wood End, Henley Green, Manor Farm and Canley, with at least 300 further homes expected to be cleared up to 2031. Such clearance will support on-going urban regeneration programmes.

The recent growth in the city's population is in part at least, a reflection of the West Midlands Regional Strategy and its approach to urban renaissance. However, this growth has added significant pressure to the city's housing market and has seen a range of regeneration schemes progressed such as New Stoke Village, Bannerbrook and Daimler Green. The new wave of 'urban villages' are now starting to progress at New Century Park and at Foleshill on the former Acetate works and Paragon Park, helping regenerate the urban environment and provide much needed homes for local communities. Such developments do however reflect recent trends in Coventry which has seen former factory sites redeveloped for housing with new job opportunities growing around the fringes of the city. Although this has had positive outcomes, the city is now seeing increasing demand for employment land and there is an important need to create a balance between homes and jobs in the urban area. At the same time the amount of brownfield land available for development is reducing as readily available sites are brought forward for development. This places pressure on the city's Greenfield sites and its Green Belt and requires further balancing between maintaining local green infrastructure and growing the city.

## The Overarching Housing Strategy

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The SHMA assessments have shown that the housing market in Coventry is generally focused towards smaller, lower value properties relative to the wider housing market area and national trends. For example, 71% of all Coventry homes are within Council Tax bands A and B compared to Nuneaton where the figure is 60% and the national average of 44%. Likewise just 10% of the city's existing housing stock is classified as detached. This is compared to 24% in Nuneaton and Bedworth and 22% nationally.

Following a period of house price decline at the end of the last decade, there are now signs of recovery and the Joint SHMA highlights that house prices in Coventry have now increased by around 8% since mid-2012. This growth has however remained below figures seen in other parts of the HMA and appears to have been influenced by the sorts of homes available. For example, the city's strongest growth in prices has been seen in its larger semi-detached and detached properties, which have seen the least availability.

Vacancy rates across the city have reduced by 38% between 2005 and 2015. We now see less than 2.5% of all properties in Coventry vacant with less than 1% of properties considered long term vacant homes (more than 6 months). This is below the national average of around 4%. Notwithstanding this reduction, there remain approximately 1,100 long-term vacant properties within the city, which with intervention could be brought back into use, helping to meet local housing needs. This will be tackled on an on-going basis through the council's empty homes strategy.

Such analysis of the city's housing market has also been reflected in past consultation, which has shown a need to provide a better quality and mix of housing within Coventry, including a range of types of housing and tenures. This particularly includes a need to provide a broader variety of 'affordable' housing, by



size, tenure and location. This has been supported by the SHMA which has identified a need to diversify the city's housing stock, encouraging an increase in larger properties to meet the needs of different communities. Furthermore, consultation and evidence have highlighted the need to consider 'group specific' housing needs, such as student accommodation, retirement dwellings, care homes and sites for Gypsies and Travellers.

These issues are considered through the Council's Housing and Homelessness Strategy, which identified a range of key themes and priorities for delivering new homes across the city. These included:

- To ensure decent homes, housing choice and support for Coventry citizens.
- Optimise opportunities for increasing new affordable housing supply to ensure that the delivery of new affordable housing is at a level that supports the economic growth ambitions of the city.
- Promote balanced and sustainable communities by diversifying the size, type and tenure of new housing, particularly family sized housing.
- Develop new affordable housing to a high quality without compromising the deliverability and viability of new housing schemes.
- Support economic growth by developing high value, high quality housing to retain higher earners and attract new residents.
- Regenerate neighbourhoods where poor quality, low demand housing exists.
- Improve existing site provision to meet the needs of Gypsies and Travellers.
- Improve energy efficiency and affordable warmth across all tenures.
- Improve property condition and management standards in the private rented sector.
- Make best use of existing housing by reducing the number of empty properties and addressing issues such as under-occupation.
- Improve housing choice for an ageing population.
- Improve the quality of our neighbourhoods to support safe, inclusive and cohesive communities.

## Scale of Housing Development

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The Coventry and Warwickshire Joint SHMA considered a range of scenarios and impacts relating to population dynamics and household formation. Through the course of developing the Joint SHMA the city's projected housing need has grown substantially. This has been reflective of new research and data relating to:

- the 2011 Census;
- unattributable population change;
- a relative reduction in projected growth within Warwickshire.

This has produced a magnet like effect for the city, and in part at least reflects the success of the Regional Strategy and its ambitions to grow the principal urban areas of the West Midlands – including Coventry. This has resulted in an Objectively Assessed Need for housing of at least 42,400 homes between 2011 and 2031. As previously highlighted in earlier sections of this plan however, the cities OAN needs to be considered in the context of its HMA as not all of these homes can be delivered within the city's boundaries. Following a thorough consideration of sustainable development principles, the constraints identified in the NPPF and a thorough assessment of land options through the Council's updated SHLAA 2015, a capacity of approximately 25,000 homes has been identified. The Council considers that this provides a degree of flexibility in relation to an agreed requirement of 24,600 homes (C&W MoU on housing requirements). The Council also considers that this will reflect a minimum housing requirement

and is at a level that is sustainable, deliverable, realistic, and achievable. Table 4.1 identifies the Council's housing land supply and sets out how this requirement will be met.

**Table 4.1:** Components of housing supply 2011 to 2031

Housing Land Supply Components	Number of Homes
Past Net Completions*	5,550
Sites With Planning Permission*	5,900
Sites Under Construction*	945
SHLAA Sites	3,058
Proposed Site Allocations (Local Plan)*	8,920
Proposed Site Allocations (City Centre AAP)**	649
Small Site Windfall Allowance	350
Total	25,372

\* In addition to the number of homes under the Proposed Site Allocations (Local Plan), 169 dwellings have been completed as of April 1st 2016 and 962 homes have planning permission or are already under construction (at April 1st 2016). These are included in the relevant headings in the table and are not double counted.

As highlighted through this chapter the level of housing delivery required across Coventry over the course of the plan period will present both challenges and opportunities. When assessing the remaining land supply approximately 52% is identified as being on brownfield land, whilst approximately 27% of total supply will be delivered on land that was designated Green Belt prior to this Plan.

## Policy H1: Housing Land Requirements

- Provisions will be made for a minimum of 24,600 additional dwellings between 2011 and 2031.
- As part of the housing trajectory (Appendix 1), this requirement is to be stepped in the following way:
  - 2011-2016 (first 5 years): 1,020 homes per annum
  - 2017-2031 (following 15 years): 1,300 homes per annum
- Housing land will be released in order to maintain a continuous 5 year supply of housing land in order to support a varied and flexible land supply to support housing delivery and sustainable development. This will be monitored through the Council's Annual Monitoring Report.

The identified land supply will offer a strong degree of flexibility, choice and opportunity throughout all parts of the city. Through the housing trajectory though, the requirement will be stepped to allow for the necessary step change in housing delivery to be managed in a sustainable and appropriate way. This will also reflect the increase in deliverable land options facilitated by this new Local Plan as well reflecting improving market conditions relative to the initial years of this plan period. Policy H1 sets out the proposed stepped trajectory of the requirements. The projected delivery of this supply is identified in the Council's housing trajectory in Appendix 1.

To help facilitate the step change in housing delivery that the city needs, Policy H2 allocates a number of strategic sites, with a further range of sites allocated through the City Centre Area Action Plan. The Council have also identified a 'Supporting Housing Delivery Development Plan Document' within its Local Development Scheme, which will be linked to the delivery of housing land across the city and be brought forward should the city's land supply fall short of 5 years (or equivalent having regard to performance). This will be continually monitored through the Annual Monitoring Report (AMR) and bi-annual reviews of the SHLAA. To ensure a robust assessment of land supply is undertaken monitoring will consider the

Sedgefield approach and factor in a 5% supply buffer as standard unless there is evidence of persistent under delivery against the housing trajectory which supports Policy H1 of this plan. Through the AMR, land supply will also be assessed against a 20% buffer and give consideration to the Liverpool approach. This additional sensitivity monitoring will also be utilised as an early warning mechanism to identify any potential need for an early review of the SHLAA or early preparation of the 'Supporting Housing Delivery DPD. This monitoring approach will also be the mechanism for updating the housing trajectory to keep it up to date and to ensure the Council maintains a continuous 5 year supply of housing land. In addition the Council will continue to work with key stakeholders through the Planning and Housing Group of the Coventry and Warwickshire LEP to encourage and support the delivery of sustainable housing growth.

In recent years the city has had a proud history of urban regeneration and bringing forward brownfield sites for redevelopment in a positive and constructive fashion. Indeed, since 2001 in excess of 90% of all new homes in Coventry have been built on previously developed land. The continuation of this trend will be challenging moving forward but will remain an important priority of this plan. Through its AMR the Council will therefore monitor closely the proportion of development on brownfield sites. This is with a view to encouraging and supporting a majority of annual completions on brownfield sites. Should this fail to materialise for 2 consecutive monitoring years then the Council will consider this a secondary trigger in the delivery of its 'Supporting Housing Delivery Development Plan Document'. Such monitoring data would not in itself however constitute a reason for refusing a greenfield development proposal.

## Policy H2: Housing Allocations

1. **Table 4.2** identifies the sites to be allocated for housing development alongside essential details that will support the principles of sustainable development. The development of all sites will also need to be considered in accordance with other policies in this Local Plan (and supporting documents) and the Infrastructure Delivery Plan, with the infrastructure needs of each site to be secured through legal agreements and/or the Council's CIL Charging Schedule where appropriate.
2. The urban extension proposals at Keresley and Eastern Green are to be brought forward in full accordance with comprehensive Masterplans and in accordance with the Council's Urban Extension Design Guidance SPD.

**Table 4.2** – Site Allocations for Housing

Site Ref	Site	Ward	Total Dwellings	GF / PDL	Essential Site Specific Requirements and Other Uses
H2:1	Keresley SUE	Bablake	3,100	GF	Retail space within local centres (policy R1). Distributor link road connecting Long Lane and Winding House Lane to be fully operational prior to the full completion of the SUE. Surrounding junction improvements as appropriate and identified through a robust TA. Provision of 2FE primary school and contributions towards a 8FE secondary school. Retention of medieval fishponds, ancient woodlands, important (ancient) hedgerows. Creation of publicly accessible green corridor along the Hall Brook and enhanced connectivity between the ancient woodlands. Protection of Jubilee Woodland. Inclusion of appropriate screening to existing residential areas.
H2:2	Eastern Green SUE	Bablake	2,250	GF	15ha of employment land adjacent to the A45 (policy JE2), which is to be developed in tandem with the residential development. The provision of a new Major District Centre (policy R1). Provision of 2FE primary school. New grade separated junction from the A45 to provide primary site access with surrounding junction improvements as appropriate. The new A45 junction should be fully operational prior to the occupation of the employment land and the Major District Centre, whilst no more than 250 homes should be occupied prior to this junction being fully operational (in accordance with Policy DS4D). Creation of publicly accessible green corridors along the Pickford Brook and its tributaries. Retention of medieval moat at Pond Farm and retention of important hedgerows. Inclusion of appropriate screening to existing residential areas. Buffering and screening at Pickford Green to protect the transition of land use into the wider Green Belt.
H2:3	Walsgrave Hill Farm	Henley and Wyken	900	GF	Retention and enhanced setting of listed buildings at Hungerley Hall Farm. Site to incorporate blue light access linking the A46 to the University Hospital. Facilitate and work with Highways England on highways proposals linked to a new Grade Separated junction at Clifford Bridge. Provision of essential drainage and flood risk infrastructure.
H2:4	Land at Whitmore Park, Holbrook Lane	Holbrook	730	PDL	As part of mixed use scheme to deliver 8ha of redeveloped employment land (policy JE2). The retention of the sports field fronting Beake Avenue. Highway works to open up Swallow Road to public traffic as appropriate. Retention of locally listed building facades and boundary walls.
H2:5	Paragon Park	Foleshill	700	PDL	Retention of building facing Foleshill Road. Remodelling of Webster Park to include a new area of playing fields adjacent to the existing primary school.

Site Ref	Site	Ward	Total Dwellings	GF / PDL	Essential Site Specific Requirements and Other Uses
H2:6	Land at Browns Lane	Bablake	475	GF	Retention of important trees and hedgerows. Need to focus primary access to Coundon Wedge Drive.
H2:7	Land at Sutton Stop	Longford	285	GF	Total Allocation is linked to extant permission (FUL/2013/0727) and should also include a 225 berth marina and ancillary provisions (as appropriate) and 1.5ha of employment land (policy JE2). The site should also incorporate in excess of 5ha publicly accessible green space and the inclusion of appropriate screening to existing residential areas. Development will need to ensure that highways access and provisions are adequate and suitable for the site. This could include remodelling of the junction at Sutton Stop and Grange Road and at Alderman's Green Road
H2:8	Land West of Cromwell Lane	Westwood	240	GF	Creation of woodland area to the western boundary of the site to reflect Ancient Arden landscape characteristics and ensure defensible boundary to the wider Green Belt. Retain and enhance the setting of Westwood Farm and other listed buildings within and adjacent to the site. Inclusion of appropriate screening to existing residential areas. Explore opportunities to introduce residents parking schemes on site and along adjoining streets with surrounding junction improvements as appropriate.
H2:9	Land at London Road/ Allard Way	Binley and Willenhall	200	GF	Retention and reuse of locally listed pumping station and lodge. Retention of important hedgerows and management of biodiversity/ ecology impacts. The provision of at least 2.5ha of publicly accessible green space as part of the development.
H2:10	Former Lyng Hall playing fields	Upper Stoke	185	mix	Provision of 1ha of publicly accessible green space as part of development
H2:11	Elms Farm	Henley	150	GF	Creation of publicly accessible green space along eastern boundary of site
H2:12	Site of LTI Factory, Holyhead Road	Sherbourne	110	PDL	
H2:13	Grange Farm	Longford	105	GF	Retention of important hedgerows. Highway improvements to Grange Road.
H2:14	Former Transco site, Abbots Lane	Sherbourne	100	PDL	Retention of sandstone boundary walls
H2:15	Land at Sandy Lane	Radford	90	PDL	Retention of the Daimler Office building on Sandy Lane
H2:16	Land at Carlton Road / Old Church Road	Foleshill	85	PDL	Retention of chimney, art-deco façade and railings of former weaving mill
H2:17	Nursery Sites, Browns Lane	Bablake	80	GF	

Site Ref	Site	Ward	Total Dwellings	GF / PDL	Essential Site Specific Requirements and Other Uses
H2:18	Former Mercia sports field	Foleshill	75	GF/ PDL	Provision of 0.5ha of publicly accessible green space as part of development
H2:19	Land at Mitchell Avenue	Wainbody	50	GF	Existing sports facilities are to be re-provided at the site of the former Alderman Harris School at Charter Avenue or an appropriate alternative site within the local area as part of this development (in accordance with policy GE2).
H2:20	Land at Durbar Avenue	Foleshill	45	PDL	As part of mixed use scheme to deliver 1.5ha of redeveloped employment land (policy JE2)
H2:21	Woodfield school site, Stoneleigh Road	Wainbody	30	mix	New homes to link in with new railway station to be delivered as part of the wider NUCKLE project (policy Ac6)
H2:22	Land at the Junction of Jardine Crescent and Jobs Lane	Woodlands	25	PDL	Retail space within extended district centre (policy R1)
H2:23	Land west of Cryfield Heights, Gibbet Hill	Wainbody	20	GF	
H2:24	Land West of Cheltenham Croft	Henley	15	GF	
H2:25	The Grange Children's Home, Waste Lane	Bablake	15	PDL/ GF	Locally Listed buildings to be retained and converted with limited new build allowed to support a comprehensive scheme. Dense tree boundaries to be retained to protect wider Green Belt setting.

NB: Site capacities have been rounded and add up to 9 dwellings more than the figures in Table 4.1, which reflects permissions and phasing to date. The figures in Table 4.1 inform the Housing Trajectory. Where there is conflict, the figures in Table 4.1 should be used as this reflects on-going monitoring.

In order to support the sustainable access to the sites identified above a number of cases are envisaged whereby local transport infrastructure will require either partial or entire construction upon land that will remain within the Green Belt. Paragraph 90 of the NPPF states "Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. Paragraph 90 goes on to clarify that this includes "local transport infrastructure which can demonstrate a requirement for a Green Belt location".

Having regard to national policy alongside the essential requirements outlined in Policy H2, the Master planning principles outlined in policy DS4 and the proposed Green Belt boundaries in policy GB1 the following sites will require local transport infrastructure that clearly demonstrates a requirement for a Green Belt location.



- Keresley SUE – Highway proposals associated with the Link Road between Winding House Lane and Long Lane
- Eastern Green SUE – The new junction from the A45 will require land to the north of the A45 to ensure traffic flows on the road are not compromised
- Walsgrave Hill Farm – highway proposals associated with the new junction at the A46 and the blue light access
- Sutton Stop – junction improvements to Alderman's Green Road
- The Grange Children's home, Waste Lane – possible access improvements at Waste Lane and/or Brownshill Green Road

In the case of land at Eastern Green and Sutton Stop this will also relate to policy JE2 should the employment elements of the site be brought forward separately.

## Location of Additional Housing Development

Future housing developments will be designed to create new and stable communities providing a mix and choice of housing types and tenures. Opportunities to create new areas of housing as part of mixed-use developments will also be encouraged. In accordance with the NPPF the Council will also encourage new self-build programmes, where local people wish to build their own homes and promote the provision of starter homes as part of meeting affordable housing need.

When considering the suitability of a site for housing development that is not already allocated, Policy H3 must be considered to ensure it is situated within a sustainable location and will ensure the creation of an appropriate and acceptable residential environment.

### Policy H3: Provision of New Housing

1. New residential development, including opportunities for self-build homes and starter homes, must provide a high quality residential environment which assists in delivering urban regeneration or contributes to creating sustainable communities and which overall enhances the built environment.
2. In addition, opportunities to provide self-build homes and starter homes will be considered acceptable as part of limited infill within existing ribbon developments within the Green Belt where it is demonstrated that they do not have an adverse impact upon the openness and integrity of the wider Green Belt.
3. A suitable residential environment will include safe and appropriate access, have adequate amenity space and parking provision and be safe from environmental pollutants such as land contamination, excessive noise and air quality issues.
4. Wherever possible new developments should also be:
  - a. within 2km radius of local medical services;
  - b. within 1.5km of a designated centre within the city hierarchy (policy R3);
  - c. within 1km radius of a primary school;
  - d. within 1km of indoor and outdoor sports facilities;
  - e. within 400m of a bus stop; and
  - f. within 400m of publicly accessible green space.
5. Proposals should also be in conformity with all other relevant plan policies.

6. Sustainable transport provision and the infrastructure required to support housing development must be considered from the onset, to ensure all sites have easy access to high quality public transport and walking and cycling routes.
7. The delivery of self-build homes will be supported where they meet the criteria of this policy.

The principles of supporting a sustainable residential development have been considered through a range of evidence and best practice as well as an overview of local services and facilities and their proximity to homes and development opportunities across the city. It is vital that new homes are easily accessible to schools, health facilities, leisure provisions and public transport etc. Should development come forward that is deficient against the criteria in policy H3 then the site specific circumstances will be considered to understand the extent to which the criteria are not met. Should it be deemed appropriate and justified without excessively impacting on development viability, developer contributions will be required via a Section 106 agreement and/or CIL. This will be managed through Policy IM1.

When considering public transport options in particular new homes should comply with the TfWM's access standards of 400m to a bus stop and seek to maximise connectivity to the existing network and facilitate extensions to this network where practicable. This should include new and improved bus connections with good service frequency to serve new larger sites where appropriate and practical.

Where possible publicly accessible green spaces should be incorporated within new developments to ensure they are easily accessible to residents. Where this is not possible however developments should ensure that publicly accessible green space is within 400m of the site in accordance with the Council's Green Space Standards. Where appropriate, new public green space should be multi-functional and support high quality urban and landscape design. Where suitable provision already exists off-site contributions may be sought through S106 agreement to support the enhancement, connectivity and maintenance of the site.

Those sites proposed for allocation in Policy H2 have already been considered against these criteria with any deficiencies to be rectified through master planning and the delivery of appropriate infrastructure.

In responding to Government objectives of facilitating the delivery of self-build homes and starter homes the Council have considered that some limited provision of these could, in accordance with national Green Belt policy, represent acceptable development within the Green Belt, but only where they represent limited infill opportunities within existing ribbon developments and complement the existing street scene. In addition proposals will only be acceptable where they do not negatively impact on the openness of the wider Green Belt or the integrity of its character and surrounding land uses. Every effort should also be taken to deliver high quality homes which have regard to the Council's SUE design guidance (as appropriate) and which complements the surrounding area.

To ensure high quality built environments are created through new development specific reference should be made to other sections of the plan including Design and Heritage for example. Supporting SPD will also be prepared to provide greater detail around design standards and expectations.

## Securing a Mix of Housing

National planning policy requires local planning authorities to plan for a mix of housing, based on demographic trends, market trends and the needs of different groups in the community, including the elderly and people with disabilities. Local planning authorities should identify the size, type, tenure and range of housing that is required in different locations.

The city has undertaken a Joint SHMA with its Warwickshire neighbours, which provides a clear understanding of the housing needs for Coventry, including the need for all types of housing and the needs of different groups in the community.

Policy H4 is concerned with the mix of general market housing only, whilst Policy H6 refers to the mix of housing in respect of the affordable homes element of housing developments. It will aim to ensure that housing development sites deliver a range of housing sizes and types which reflects the needs of Coventry over the plan period taking into account the current housing stock and the need to diversify the city's housing offer.

## **Policy H4: Securing a Mix of Housing**

- 1.** The Council will require proposals for residential development to include a mix of market housing which contributes towards a balance of house types and sizes across the city in accordance with the latest Strategic Housing Market Assessment.
- 2.** In assessing the housing mix in residential schemes the Council may take into account the following circumstances where it may not be appropriate to provide the full range of housing types in accordance with the latest Strategic Housing Market Assessment:
  - a)** physical constraints, such as those associated with small sites of less than 5 houses and conversion schemes, where opportunities for a range of different house types are limited;
  - b)** locational issues, such as highly accessible sites within or close to a designated centre where larger homes and low/ medium densities may not be appropriate;
  - c)** sites with severe development constraints where housing mix may impact on viability;
  - d)** sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset; and
  - e)** developments in parish or neighbourhood plan areas, where there is an up-to-date local housing needs assessment which provides a more appropriate indication of housing need.

In Coventry, there is a greater need for larger 3 and 4 bed family homes (60-70% of total new homes). A need does still remain for smaller properties to help maintain a mix of new homes and improve quality within the existing housing stock.

The Council considers that it is particularly important that the strategic sites provide the full range of housing to meet the assessed need. This will provide greater opportunities for the whole community to live near their place of work in modern, energy efficient homes and to reduce out-commuting. It will also help to provide a variety of housing types and sizes and support the diversification of existing housing stock within local communities. Such an approach is integral to ensuring suitable housing pathways are created within local communities allowing people to retain their community links when moving home, should they wish to do so.

The Council accepts that not all sites will be able to accommodate the full range of housing types. The Council will, therefore, take into account the nature and location of the scheme and, in particular, whether there are any genuine reasons why a mix of types cannot be delivered in practice, or would be harmful to the setting of a heritage asset.

## **Managing the Existing Housing Stock**

People's need for housing is met from both the provision of new housing and, for the majority, through the existing stock. As such, it is important that there is a balance between the maximum use of existing dwellings and the development of new housing. This may involve an improvement in the quality of homes, as well as the clearance and redevelopment of housing which has reached the end of its useful life. Four key components of this approach are:

- The return of empty properties to habitable use, especially those that have been vacant for more than 6 months. This will be carried out in line with the Council's existing and future Empty Homes Strategy.
- The provision of purpose built student accommodation within the most sustainable locations and the suitable management of Houses in Multiple Occupation (HiMOs). This is with a view to 'freeing up' family housing for purchase or private rent and helping to maintain and build stronger, more stable communities.
- The provision of residential care facilities and retirement properties. Again, this can help overcome under occupation of family properties and provide sustainable and affordable alternatives within established communities.
- The continued refurbishment and enhancement of existing dwellings through external and internal wall insulation and other sustainability initiatives will be supported to improve energy efficiency and build quality.

## Policy H5: Managing Existing Housing Stock

1. Where appropriate, the existing housing stock will be renovated and improved, in association with the enhancement of the surrounding residential environment and to meet local housing needs. Where appropriate these works should include opportunities to improve energy efficiency of existing homes.
2. The conversion of buildings from non-residential to residential use will be supported providing a satisfactory residential environment is created and the proposals are compatible with other Plan Policies.
3. Demolition and redevelopment schemes will be supported where existing housing stock does not meet local housing market needs, and its redevelopment represents the principles of sustainable development.

At the current time 15.7% of households in Coventry experience fuel poverty and this will need to be challenged through improvements to the existing housing stock and ensuring new homes are energy efficient. As such, schemes like those recently brought forward in Willenhall and Henley Green, will be supported and encouraged. Renovation works should also help enhance the surrounding residential environment and help meet local housing needs. This is with a view to improving the quality of the city's housing offer and can also make valuable contributions to reducing fuel poverty and supporting improved health and wellbeing of occupants.

Demolition and redevelopment schemes will be considered where the existing housing does not meet local housing market needs or is in a very poor state of repair. Regeneration will be undertaken so as to promote sustainable urban living, enhance the public realm, combat climate change, improve accessibility and address social deprivation. Replacement provision should also represent the most efficient use of land in accordance with council's density policy. Together these considerations will ensure that regeneration projects respond to the 3 aspects of sustainable development outlined in the NPPF.

## 'Affordable' Housing<sup>1</sup>

The Council is committed to planning for high quality affordable housing for people who are unable to access or afford market housing. The policy intention is to ensure that a choice of housing is available to all in mixed tenure, balanced and sustainable communities.

<sup>1</sup> Affordable Housing is referenced in line with the definition in the NPPF

The 2015 Joint SHMA update identified a need for 12,000 additional affordable homes within Coventry between 2011 and 2031 (600 per annum). This is considered to be the city's objectively assessed need for affordable housing. Set within the context of the city's total housing need of 42,400 homes, this represents approximately 28% of total housing growth.

If a pro-rata approach is taken, linked to the city's identified capacity (24,600), this would require the Council to identify sufficient supply for around 348 affordable homes per annum or 6,960 in total over the plan period.

The remaining affordable housing need will be managed as part of developments within Warwickshire which will be brought forward to support the city's remaining housing need (in full). The majority of Warwickshire authorities have higher proportions of affordable housing need as part of their respective policies therefore this approach will not only ensure the city's remaining need is supported, but also that wider need across Warwickshire and the needs of the HMA as a whole can be accommodated in a sustainable and viable way. The Council will work with its Warwickshire neighbours to ensure appropriate allocation policies are implemented.

An Affordable Housing Economic Viability Assessment (AHEVA) has also been undertaken, which assessed viability at differing value points across Coventry.

Together the AHEVA and the Joint SHMA have supported the preparation of the Council's 'affordable' housing policy and will also guide future reviews of its Housing Strategy.

In order to meet the affordable housing need identified in the SHMA, the Council will seek a developer contribution of 25% towards the provision of affordable housing on developments of 25 dwellings or more, or over 1ha in area, taking into consideration specific site circumstances and economic viability.

During the first 4 years of the plan period a total of 1,239 affordable homes have already been completed, whilst as of April 1st 2015 1,285 affordable dwellings had planning consent or were under construction. The sites shortlisted in the SHLAA and those proposed for allocation in Policy H2 have capacity to deliver nearly 3,300 further affordable homes across the city based on this policy.

This leaves a shortfall of approximately 1,150 homes. It is expected that this shortfall will be met through a range of approaches, including:

- Windfall sites in addition to those sites identified in the SHLAA and Policy H2
- the Private Rented Sector - This reflects the evidence in the Joint SHMA around the level of support the Private Rented Sector (supported by housing benefits) gives to those seeking affordable housing. The Council considers that high quality provision within this sector could offer a clear choice within the city's housing pathways and may help to meet the city's housing needs.
- Further redevelopment within the existing affordable housing stock – This primarily involves on-going regeneration projects, such as those at Canley and Wood End, where clearance of hard to let or low demand properties will help to make way for higher demand homes, helping meet housing need in a more robust and appropriate way.
- The city also has a proven track record of delivering affordable homes on sites with direct provision by Registered Providers and currently averages in excess of 180 homes a year through this mechanism. Although a limited allowance is made for this in the above calculations it is substantially below established trends and offers significant flexibility over the course of the plan period.
- The re-use of long term empty homes as part of the council's empty homes policy. The use of compulsory purchase powers or enforced sale may be utilised by the Council, especially where existing owners cannot be determined.

## Policy H6: Affordable Housing

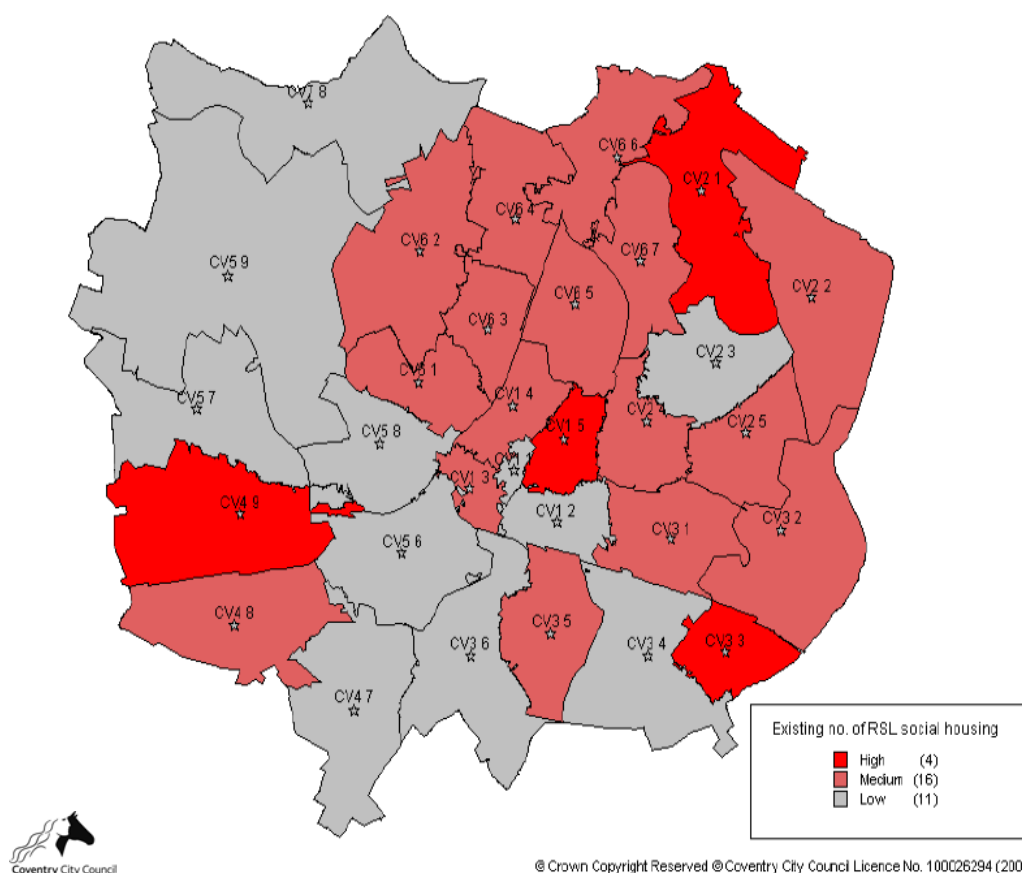
- 1.** New residential schemes of 25 dwellings or more (excluding student accommodation), or more than 1ha, will be expected to provide 25% of all dwellings as affordable homes.
- 2.** Proposals within areas of existing high concentration (shown on Figure 4.1) should make provisions as follows:
  - a.** 10% Social/Affordable Rental provision
  - b.** 15% Intermediate Provision
- 3.** Proposals within areas of existing medium concentration (shown on Figure 4.1) should make provisions as follows:
  - a.** 12.5% Social/Affordable Rental provision
  - b.** 12.5% Intermediate Provision
- 4.** Proposals within areas of existing low concentration (shown on Figure 4.1) should make provisions as follows:
  - a.** 15% Social/Affordable Rental provision
  - b.** 10% Intermediate Provision
- 5.** Where the specified level of affordable housing cannot be provided, including for reasons of viability, robust evidence must be presented to justify a reduced or alternative form of contribution.
- 6.** Through appropriate design standards, new affordable housing units must be appropriately integrated within the development and with other affordable homes adjoining the site.
- 7.** Through engagement with the Council, Registered Providers, and having regard to the recommendations of the SHMA, developers should ensure that affordable housing contributions comprise dwellings of the right size, type, affordability and tenure to meet local needs.

The Council's initial SHMA for Coventry (2012) is considered to provide a justified and strategic overview of affordable housing need at a local sub-market level within the city. However, to reflect the on-going work on SHMA's across Coventry and Warwickshire the Coventry SHMA is considered to reflect a minimum approach to total need. This more local level study identified sub-markets within the city, each with differing market characteristics and levels of affordable housing need. It highlighted the geographical imbalance in the current distribution of 'affordable' homes throughout the city.

To support this work the existing affordable housing distribution within the city has been analysed at four-digit postcode level, showing which areas have a high existing stock of social housing (over 1,500 properties) and which have a low existing social housing provision (under 500 properties). The areas that fall between these two figures are classed as having a medium level of existing provision.



**Figure 4.1** - Plan of Value Areas for Affordable Housing Provision



Alongside the SHMA work, this information has helped inform the different requirements for the tenure of affordable homes across different parts of the city. These are clearly set out in Policy H6 and represent target levels of provision. These will help to meet local affordable housing needs and create greater tenure diversification, improved housing pathways, and the re-balancing of local housing markets. The Council will however consider these targets in a flexible way where robust evidence is provided to demonstrate viability pressures. Under such circumstances opportunities should be considered to make alternative tenure provisions before reduced contributions are considered. Where the provision of 25% affordable homes cannot be provided on site and a lower or zero provision is proposed, this should be clearly justified through a robust open book Residual Land Valuation exercise.

In exceptional circumstances however the Council may consider alternative forms of provision. This could include off site provision of affordable homes. Where all options for securing on-site provisions have been explored and exhausted, alternative sites may be proposed (for example, an alternative site in an area of lower existing affordable housing to contribute to the creation of mixed and balanced communities) or a financial contribution may be agreed (for example, where property types such as flats over shops are proposed but are not acceptable to Registered Providers). Any off-site provision must be equivalent to the volume that would be viable if provision was made on-site. In terms of a financial contribution this should be provided as an equivalent commuted sum as part of a S106 agreement. This should be calculated by subtracting the residual land value of the site with 25% affordable housing from the residual land value with 100% market housing. Such calculation will require costs and values to be kept constant unless otherwise agreed by the Local Authority.

This policy approach seeks to strike a balance between development viability and meeting housing needs. This encourages the diversification of the 'affordable' housing stock, by meeting identified needs where they arise and provide choice for those in housing need, with future supply distributed throughout the city rather than concentrated in particular localities.

The greater proportion of intermediate tenure required in areas with high existing rented housing supply will diversify the tenure mix and assist households from those localities who aspire to home ownership (but who cannot otherwise afford market housing), as well as contributing to the city's overall need for affordable housing. There is, however, a need for continued delivery of social and affordable rented properties in these areas to meet changing household needs. Indeed, where the Council's SHMA work and Housing Strategy highlights a specific need for social rented provision this should be provided as a priority within the rental element of affordable need.

It is expected that affordable homes will be delivered on-site and integrated within the proposed development. When locating affordable homes within a scheme consideration should also be given to any existing affordable homes that adjoin the site. This will help to ensure that affordable homes do not become overly concentrated and that new development is well integrated within the wider urban area. This should reflect the management requirements of the Housing Association as well as the need to create balanced and mixed communities.

In addition to providing a range of tenures, it is important to ensure that property types delivered meet affordable housing need. The Council will therefore look to deliver a balanced profile of affordable housing to meet local needs in accordance with the most up to date SHMA. The precise mix of dwellings will however be negotiated on each site, but on sites which are suitable for family housing with 3 or more bedrooms, this should be prioritised. This reflects the recommendations of both the 2012 Coventry SHMA and the 2013 Joint SHMA, which highlight the need for larger family homes (with approximately 60% of new homes being of three or more bedrooms), housing for older people, specialist and supported housing.

## Gypsies and Travellers

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In March 2012 DCLG issued Planning Policy for Traveller sites, which supplements the NPPF and provides national guidance on planning for Gypsy and Traveller<sup>2</sup> sites. This has subsequently been updated in August 2015 to incorporate a number of small changes to the methodology. The overarching aim of national policy is to "ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community"<sup>3</sup>.

In order to understand the city's local needs a new Gypsy and Traveller Accommodation Assessment was carried out in 2014. This identified two Gypsy and Traveller sites in Coventry. The first at Siskin Drive is owned by the Council, but does not meet current requirements and requires regeneration. Indeed, only 4 pitches are currently occupied on the site, despite its existing capacity of 22. The second site is situated at Burbages Lane and is privately owned with all 14 pitches fully occupied. The study also identified that the households occupying these sites had become reasonably settled with no immediate intention of moving.

The study identified a need for 34 permanent pitches across Coventry over the next 5 years, however 5 of these pitches related to needs originating from existing families living in bricks and mortar accommodation. Due to the difficulties in engaging with these households, the need for these 5 pitches was based on assumptions linked to the Census data. Based on the amendments to national guidance there is uncertainty as to whether it remains justified to plan for these specific provisions. As such, this would mean the city requires a total of 29 permanent pitches over the next 5 years. To meet this need the study identifies a total supply of 30 permanent pitches across the 2 existing sites. This is however based on the assumption that the Siskin Drive site will be refurbished and remodelled to provide fewer, larger pitches better meeting modern design standards. Indeed work is continuing with the Homes and Communities Agency (HCA) to secure the necessary grant funding to support the regeneration of this site creating a total of 16 new pitches (a net reduction of 6 pitches). To support this on-going work the site is allocated through the Local Plan for the delivery of 16 permanent pitches to meet short term need. It is also identified on the Policies Map.

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<sup>2</sup> For the purpose of policy, Annex 1 of the National Planning Policy for Traveller Sites (as updated at August 2015) provides a definition of Gypsies, Travellers and Travelling Show people.

<sup>3</sup> Paragraph 3 - the National Planning Policy for Traveller Sites (March 2012)

In terms of longer term need the study identifies a requirement for 6 additional permanent pitches to 2031. National Guidance does not however require immediate allocation of these pitches, but does support a criteria based policy to help guide and consider additional pitch proposals. National Guidance also requires such a policy to be “fair and facilitate the traditional and nomadic life of travellers whilst respecting the interests of the settled community”. Policy H7 will therefore support windfall proposals for new pitches as and when they are brought forward through the planning process.

In addition to permanent pitches the updated needs assessment also identifies a need for at least 6 temporary or transit pitches to avoid nuisance caused by uncontrolled encampments in unsuitable areas. This need reflects a change on past assessments and has been driven primarily by an upturn in illegal encampments in the last 2 years, with more than 70% of all occurrences taking place in this time. Prior to this, illegal encampments within Coventry were rare with DCLG records showing no illegal encampments registered on the bi-annual count, with the study showing only sporadic occurrences dating back to 2009. As such, there is a genuine risk that this short term increase in illegal encampments is a temporary departure from long term trends. Indeed the study does recommend an on-going monitoring of these trends.

The provision of temporary stopping places will therefore be considered through the criteria based policy set out below. Should on-going monitoring identify a continuation of recent trends and demonstrate that this is not a short term deviation then the council will consider the need for a targeted review of this Local Plan in accordance with Policy DS1 and the monitoring framework which supports this Plan.

## Policy H7: Gypsy and Traveller Accommodation

1. Provision will be made for at least 16 permanent pitches for Gypsies and Travellers through the re-modelling of the site at Siskin Drive, Coventry (as identified on the Policies Map).
2. Proposals for additional permanent and temporary Gypsy and Traveller sites outside of the Green Belt (and within it, if very special circumstances have been demonstrated) will be assessed against the following criteria:
  - a. The sites use should not conflict with other development plan policies or national planning policy relating to issues such as risk from flooding, contamination or agricultural land quality;
  - b. Sites should be located within reasonable travelling distance of local services and community facilities, including a primary school;
  - c. The site should enable safe and convenient pedestrian and vehicle access to and from the public highway, and adequate space for vehicle parking, turning and servicing;
  - d. The site should be served by adequate water and sewerage connections, power and waste facilities;
  - e. The use of the site should not have an adverse impact on the amenities of occupiers of nearby properties or the appearance or character of the area in which it would be situated.

By way of reasonable travelling distance, national guidance draws some similarities between sites for Gypsy and Travellers and sites for general bricks and mortar housing. As such, the standards set out in policy H3 should be considered when determining applications for Gypsy and Traveller sites.

## Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation

Primarily as a result of improved life expectancy, the number of people aged over 55 in Coventry is expected to increase by approximately 26% by 2031<sup>4</sup>, and the population aged over 85 is also predicted to increase by in excess of 76%. Although substantial increases these figures are below those of the city's Warwickshire neighbours, which reflect the city's younger population base. The Council's Older Peoples Housing Strategy identified some key themes to improve the range and quality of housing available to this age group. These included enabling older people to maintain their independence and to make active and informed choices for suitable housing, care and support, while maximising their quality of life.

The Council will therefore work with key stakeholders and encourage various housing options for older people, which may include the provision of new purpose built accommodation ranging from suitably designed and spacious bungalows, to fully accessible apartment schemes and larger housing with appropriate levels of care, services and support. Schemes that propose a mix of tenure and care facility will also be supported and encouraged. This reflects the increasing variety of accommodation available to older people and the importance of meeting the specific housing needs of this aspect of the city's population.

The Joint SHMA (2013) estimated that the future need for specialist housing for older people however could be met largely by Extra Care Housing schemes. Whilst estimates of the need for Extra Care Housing are likely to change over the plan period, the Joint SHMA includes data which suggests a need for 4,089 units (gross) over the plan period of which 12% would need to be provided as an affordable tenure. This level of need is estimated on the basis that no Extra Care Housing existed at 2011. The net need, taking into account committed and completed Extra Care Housing schemes between 2011 and 2013, was 3,492 units.

Extra Care Housing provides for people with varying levels of care needs. Some occupiers will require help with housekeeping only, whilst others will require a more personal level of care. These schemes, therefore, will need to be located in areas with good access to local services and public transport to suit those with more independent lifestyles. The Council will encourage the provision of Extra Care Housing schemes on the strategic sites, particularly where they are located close to community facilities and as part of mixed developments to help promote housing pathways. As such, older people's residential provisions will provide valuable additions to the Council's housing land supply as it will meet the needs of identified households. To support future housing pathways, opportunities for new Extra Care provision within the Urban Extensions at Keresley and Eastern Green should be considered at the Master planning stage. Within the urban extensions and through city wide development in general opportunities should be taken to focus new provisions around designated centres, with the recent development at the Butts a prime example of what can be achieved across the city.

To help facilitate increased supply of appropriate residential provision the Council will encourage diverse provision through appropriate funding and the recycling of suitable council-owned sites. The Council will also seek to improve upon and expand, where necessary its existing stock of housing aimed at supporting those groups with specific needs e.g. Learning Disabilities and other supported housing.

### **Policy H8:** Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation

1. Proposals for care homes, nursing homes and other specialist and supported forms of housing for the elderly and those requiring care will be encouraged in areas that are accessible by a choice of means of transport and that are situated in close proximity to key local services.
2. Proposals should be of a high quality and design and be compatible with the character of the surrounding area.

<sup>4</sup> 2013 Joint SHMA Population projections

Building Regulations require all new dwellings to be accessible and usable. In general, new dwellings are constructed to mobility standards, having regard to the characteristics of each site, which enables anyone who has or develops impaired movement or a wheelchair user to have reasonable access to and within the dwelling.

In addition, new homes brought forward under policy H8 will need to be in close proximity and accessible to a wide range of services and facilities. As such, sites within or adjacent to designated centres will be supported in order to facilitate such access. Consideration will also be given to the standards identified in policy H3, although these should be considered a maximum in these circumstances and should, where possible be reduced to enhance access to services.

In delivering these aims the Council is committed to becoming an Age Friendly City and the delivery of a high quality housing offer to support the city's older population is considered an integral part of this.

## Residential Density

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The NPPF specifically encourages the identification of locally set density requirements that reflect local circumstances. In order to support this, the Council have undertaken a detailed assessment of recent developments throughout Coventry in order to identify development density trends.

In order to promote sustainable urban regeneration, new residential developments must promote the most efficient and effective use of land. The assessment of recent developments has shown that the density and mix of residential development largely reflects local density patterns, and this should continue. In order to support urban regeneration and high quality design, development must ensure that land is used as intensively as possible whilst remaining compatible with the quality, character and amenity of the surrounding area. Higher densities do not and should not compromise the quality of new development and, indeed, they can continue to be achieved using a variety of building types in response to local character and context. However, the character of some parts of the city, particularly to the south and west, is formed by lower density development and such development plays a major role in providing a choice of housing and in contributing to the diversity of the city's housing market.

The best locations for higher density development would be within or adjacent to designated centres or public transport nodes. This is particularly true of the city centre where recent densities have consistently exceeded 200 dwellings per hectare (dph).

Thus design principles will be vital when delivering higher densities, to ensure the protection of local distinctiveness and an attractive environment for residents, businesses and investors.

When considering density however it is also important to ensure it is considered alongside other essential onsite provisions such as appropriate levels of amenity space, landscaping and any appropriate onsite infrastructure. As such, the Council's policy is set in the context of net densities that seek to maintain:

- at least 20% of gross site area to remain undeveloped on sites in excess of 2ha;
- at least 15% of gross site area to remain undeveloped on sites below 2ha; and
- at least 5% of gross site area to remain undeveloped on sites within the city centre.

The undeveloped areas should focus on providing localised green spaces, landscaping and other public realm provisions as appropriate. Main roads, parking spaces and gardens have been considered essential elements of a residential property and are counted towards the developable area. The reduction of site area to reflect density will also help to support the Council's green space standards and ensure high quality built environments. Exceptions to this may exist as part of site proposals to reflect site specific circumstances.

## Policy H9: Residential Density

1. Residential development, including conversions, must make the most effective and efficient use of land whilst ensuring compatibility with the quality, character and amenity of the surrounding area.
2. Therefore, outside of the Ring Road (The A4053) a minimum of 35 dwellings per hectare (net) should be provided on Previously Developed Land.
3. Developments inside the Ring Road (The A4053) should aim to achieve a minimum of 200 dwellings per hectare (net).
4. Developments on Greenfield sites should achieve a minimum of 30 dwellings per hectare (net).

## Student Accommodation

The Council commissioned a Student Accommodation Study in 2005 in order to investigate the likely needs and impacts arising from two expanding universities. At the time of the study a number of concerns had been expressed in some inner-city communities about high concentrations of student housing, which could upset the balance of the local area, jeopardising local services and causing problems for non-student residents (through a reduction in demand for schools and local services, noise, anti-social behaviour, demand for parking space and the poor management and maintenance of houses and gardens). Such concerns continue to be raised today through consultation exercises. In contrast, there has also been recognition from key stakeholders of the positive benefits which the two universities and their students bring to the city as a whole.

The Study showed that there were approximately 24,500 full time students at the cities two universities in 2005. More recent evidence shows that this had increased to approximately 38,000 full time students with more than 50,000 students in total in 2014. The 2005 study showed that approximately 10,500 (43%) of all full time students from both universities were in managed accommodation. Although the number of available bed spaces across the city has increased by 26% since 2005 (meaning there is now a sufficient number to accommodate in excess of 13,300 students) the proportion of bed spaces to full time students has not kept pace with the continued growth of the universities.

The 2005 study highlighted that a number of opportunities had been taken since the turn of the century, especially on sites close to Coventry University, to provide new purpose-built student accommodation. The supplementary evidence has identified the continuation of this trend, with in excess of 3,500 bed spaces currently with extant planning permission. Market drivers, in terms of planning applications and the completion of new student bed spaces suggest continued developer interest in purpose built student accommodation, with a strong viable market, especially within the city centre. The continued delivery of these purpose built schemes, and those similar in nature, will be supported by the Council as they:

- make significant contributions to the Council's housing land supply;
- meet specific housing needs within the city's population;
- offer modern and high quality accommodation to support both universities;
- support and facilitate urban regeneration; and
- help minimise the uptake of family housing by students in the private rented sector.



## Policy H10: Student Accommodation

1. Purpose-built student accommodation and conversions of residential and non-residential properties to student accommodation will be encouraged where:
  - a. It is directly accessible from the universities;
  - b. Such development can play a part in the regeneration of the immediate neighbourhoods without disadvantage to local services.
  - c. It will not materially harm the amenities of occupiers of nearby properties; and
  - d. It will reflect and support or enhance the appearance and character of the area.
2. To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement.

To be considered directly accessible to either university sites for new student accommodation should be situated within easy walking distance of the university's, or easily accessible by cycling or public transport. This will predominantly mean they are situated either within or adjacent to the city centre or the University of Warwick campus. This will reduce the reliance on car travel, encourage active travel, and reduce congestion and pollutants and the need for onsite parking spaces within such schemes. In the case of the city centre it will also contribute towards further increases in city centre living.

In terms of new student accommodation reflecting the appearance and character of its surroundings, this will again be of particular importance within the city centre. This recognises the 7 Conservation Areas and range of other heritage assets that are present within the city centre and the need to protect their setting and historic character.

The changing face of student accommodation means that it now sits within a variety of use class categories. In terms of creating living environments specifically for students within existing residential provisions this policy will only relate to schemes that will occupy more than 6 students. Where proposals relate to purpose built student accommodation or the conversion of non-residential properties to student accommodation however the policy will apply in all cases.

The tenure of student accommodation will be secured through a Section 106 agreement. This reflects the fact that should the properties be occupied by other aspects of the city's population then it would be required to contribute affordable housing and potentially other Section 106 or CIL contributions. Should the tenure change to general market or affordable housing then such contributions will need to be considered through a variation of the Section 106 agreement and/or planning permission.

## Homes in Multiple Occupation (HiMOs)

The private rented sector has become a significant component of the city's housing offer and now accounts for 21% of the total housing stock in Coventry. It forms an integral part of the city's housing pathways and includes a variety of types of provision including HiMOs and shared housing.

Both the Coventry SHMA (2012) and the Joint SHMA (2013) considered the importance of the private rented sector in meeting the city's housing needs and how it provides a well-established role in helping to ensure sufficient housing is accessible to all aspects of the city's population. Indeed, the SHMA also highlighted that HiMOs can provide an affordable housing option for young professionals and graduates and a first foot on the housing ladder for many of the city's young people in general. They therefore contribute towards meeting the housing demands of the cities workforce both current and future.

Although private rented homes in general have very similar characteristics to those in home ownership, the HiMO and shared housing elements often draw concerns from local communities for a variety of reasons. The principle concern reflects the loss of traditional family housing to shared accommodation or HiMOs

and the often transient nature of residents hence impacting on community cohesion, the provision of local services, parking pressures and the appearance and maintenance of properties. These issues have been highlighted through a range of consultation events that have informed this Local Plan.

The 2011 census identified that 6,780 households in Coventry (around 5%) are living in multi-person households. In addition a further 200 were classed as living in shared accommodation (0.1%). It is especially prevalent in parts of the city that benefit from excellent accesses to the universities, the city centre and some of the other locations within the centres hierarchy. The Census also highlighted that these properties are generally concentrated in a small number of areas across the city.

Such concentration of property type however reflects similar patterns across the whole of Coventry. This can be identified through the Coventry SHMA's 5 sub-markets, which are reflective of different housing characteristics throughout the city. Indeed, this draws out examples such as areas to the south of the city which focus on low density large family homes, or a concentration of social and affordable rented homes to the south east or north east, or a focus on higher density modern family homes within an urban village environment towards the centre and north of the city. As such, although the city has an overall focus towards smaller lower value homes at the local level there is no evidence of an 'atypical' balance or mix of property types or community. Instead there is greater evidence of localised concentrations, albeit of varying types and tenures. This in part reflects historic development patterns within Coventry, but also reflects market pressures, housing pathways and access to jobs and education. More recently, changes to national permitted development rights, and difficulties accessing mortgage finance, have supported the growth in the city's multi person households and the private rented sector.

## **Policy H11: Homes in Multiple Occupation (HiMOs)**

- 1.** The development of purpose built HiMOs or the conversion of existing homes or non-residential properties to large HiMOs will not be permitted in areas where the proposals would materially harm:
  - a.** the amenities of occupiers of nearby properties (including the provision of suitable parking provisions);
  - b.** the appearance or character of an area;
  - c.** local services; and
  - d.** The amenity value and living standards of future occupants of the property, having specific regard to internal space and garden/amenity space.

To reflect permitted development rights, policy H11 relates to large HiMOs. This includes the conversion or development of homes to occupy more than 6 unrelated individuals. This does not mean the property must contain more than six bedrooms to be classified as a large HiMO. Indeed it may only contain 3 double bedrooms for example. In order to clarify this aspect of HiMO development, planning applications should clearly highlight the intended occupancy or potential occupancy of bedrooms as part of a Planning Statement or Design and Access Statement.

This Plan has already identified the importance of diversifying the city's housing stock, and the influence of the private rented sector in general is no exception to that aim. The Council considers one of the most integral implications of this though relates to the quality of the rental offer and management of properties, especially during times of vacancy. Although key to ensuring high quality environments they are issues more related to wider Housing Strategy and Environmental Health. As such, these issues will be tackled through the review of the Council's Housing Strategy. In parallel with the performance of local centres and services, concentrations of HiMOs (small and large), shared accommodation and the private rented sector in general will be monitored closely as part of implementing this Local Plan and supporting the Housing Strategy. This will help to ensure any adverse impacts are managed and combated in the most appropriate way.

## 5. Retail and Town Centre Use

### Relevant Evidence Base

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- The Coventry Shopping and Centres Study (2014 update)
- The Coventry Local Centres Assessment (2015)
- Annual Monitoring Report
- Friargate Masterplan
- City Centre South Masterplan

### Introduction

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**The role and function of town centres nationally is changing as people shop and undertake leisure activities in different ways than they have done in the past. As such, town centres need to diversify, making wider provisions to support their community, whilst ensuring they are attractive, diverse and accessible to those wanting to use them. Successful centres are of vital importance to local communities across the city as they play an important part in supporting economic growth, encouraging investment, urban regeneration and job creation.**

With this in mind this plan will support new retail and town centre developments across Coventry building upon the NPPF's centres first approach and establishing the city centre as the primary focus for new retail and leisure investment. It will set out Coventry's hierarchy of centres, as well as identify a range of proposals which will support and enhance the respective roles of these centres. Proposals will also be encouraged which diversify the range of uses in designated centres without compromising the shopping function, particularly those uses which make the town centre more attractive to residents, employers, shoppers and visitors.

Across the city there are also a range of out of centre retail parks, such as Gallagher Retail Park and Airport Retail Park. It is recognised that whilst these areas currently complement the city's retail offer, any proposals for the future expansion, intensification or changes of use at these locations should be carefully assessed to ensure that they do not have a detrimental impact on designated centres and any existing, committed or planned town centre investment.

The city also contains a network of local shopping centres, other smaller shopping frontages and local shops serving the daily needs of local communities. These facilities are within easy walking distance of many people thus reducing the need to travel and contribute towards sustainable communities.

## Coventry's Retail Based Needs

To support the Local Plan and City Centre Area Action Plan, the Council appointed Nathaniel Lichfield and Partners to undertake an update of its Shopping and Centre Study. This study looked at two levels of population growth within Coventry, firstly, one which was more reflective of likely city housing capacity (and subsequent population growth) and secondly, one which had regard to the latest population projections issued by the ONS. The evidence highlights that the city's retail catchment area exceeds its administrative boundaries and draws expenditure from its surrounding neighbours. With this in mind the Local Plan seeks to make provision for the level of retail need required to support its full projected population growth and needs, regardless of housing capacity as this supports and recognises the city's position at the heart of the sub-region. This also fully reflects the expenditure and needs calculations in the Shopping and Centres Study. Table 5.1 below builds upon the information set out in policy DS1 and highlights the full extent of retail need identified for Coventry over the plan period. The Shopping and Centre's Study is clear that this level of need requires regular monitoring and that the need identified post 2021 in particular should be treated with caution due to the changing face of retail and expenditure patterns. In terms of the city centre element of this need, this will be delivered through the City Centre Area Action Plan. The allocation of convenience floor space, A2 provision and retail warehouse need towards the city centre reflects the recommendations and overarching principles of the Shopping and Centres Study and the need to consider such provisions sequentially through the hierarchy. As such, new opportunities should be provided within the Primary Shopping Area or wider city centre wherever possible to meet these needs unless otherwise identified in Policy R1. If this does not prove possible through the Sequential Assessment process then provisions should be focused towards the other centres within the hierarchy as appropriate.

**Table 5.1** – Retail Needs by Type (sq.m of gross floor space) to 2031

	to 2031				
	Convenience	Comparison (A1)*	A2	A3-A5	Retail Warehouse
City Centre	21,882	27,667	9,712	10,010	21,758
Rest of City		13,175		2,630	
<b>Total</b>	<b>21,882</b>	<b>40,842</b>	<b>9,712</b>	<b>12,640</b>	<b>21,758</b>

\* An allowance for at least 10,000sq.m of new retail floor space at City Centre South has been added into the short term projection.

NB: all figures are for gross floor space

NB: Source: Coventry Shopping and Centres Study (2014)

In this context, Table 5.2 highlights that more than two thirds of retail need is focused towards the end of the plan period, reflecting stronger projections of retail expenditure post 2021.

**Table 5.2** – Retail Needs by Period (sq.m of gross floor space) to 2031

	To 2021	2021-2031	Total 2011-2031
Total Convenience Retail floor space	8,090	13,792	21,882
Total Comparison Retail floor space (A1)*	14,191	26,651	40,842
Total A2 floor space	3,189	6,523	9,712
Total A3-A5 floor space	7,183	5,457	12,640
Total Retail Warehousing floor space	2,425	19,333	21,758
Total	35,078	71,756	106,834

\* An allowance for at least 10,000sq.m of new retail floor space at City Centre South has been added into the short term projection.

NB: all figures are for gross floor space

NB: Source: Coventry Shopping and Centres Study (2014)

Notwithstanding, this plan recognises the importance of providing certainty over location (wherever possible) and providing sequentially preferable opportunities to help promote sustainable development and the long term vitality of the centres hierarchy. New allocation proposals will therefore sit alongside existing commitments and the reduction of vacant premises to meet the city's new retail needs. Table 5.3 sets out the supply components of retail floor space.

**Table 5.3:** Supply Components of Retail Floor Space (to 2031)

Retail Floor Space Supply Components	Gross Retail floor space (sq.m)		
	Convenience	Comparison A1	Other Retail based - A2-A5
Completion since Study (2015-2016)*	125	1,430	0
Sites With Planning Permission	1,813	1,491	490
Sites Under Construction	818	0	0
Occupation of vacant premises (outside of city centre)	0	10,600	
Proposed Site Allocations (city centre)**	10,000	60,100	
Proposed Site Allocations (wider city)**	10,200	10,000	
Total	<b>22,956</b>	<b>84,111</b>	

\* Completions since study refers to the level of completed floor space in Coventry since the completion of the NLP Study in 2014. This study identified the level of need which has informed the Local Plan.

\*\* Allocations within the city centre include 33,825sq.m of retail floor space (use class A1-A5) with planning permission or under construction. Allocations within the wider city Include 1,843sq.m of floor space with planning permission or under construction.

The Shopping and Centres Study identified opportunities to occupy existing vacant premises totalling 20,200sq.m. This comprised 9,600sq.m within the city centre and a further 10,600sq.m in the wider city. This floor space is identified within the study as contributing towards the city's total needs with a specific reference to the full occupation of the new centre at Binley. The occupation of vacant premises within the centres hierarchy is identified as a priority and is expected to occur within the period to 2021.

## Policy R1 Delivering Retail Growth

1. The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and other policies within this plan and the City Centre AAP as appropriate.

Site	Proposed floor space (sq.m gross)	Details
City centre	At least 70,100	A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units.
New Eastern Green Major District Centre	Up to 10,000	To include approx. 5,000sq.m for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions.
Cannon Park Major District Centre*	6,200	New A1 elements of the scheme should be restricted to convenience and bulky goods retail. Non A1 uses will be supported to encourage diversification of the centre, especially around A2-A5 uses.
New Keresley Local Centre south	1,500	Local centre to include a range of small scale units providing a range of local community uses and top up provisions.
New Keresley Local Centre north	1,000	Local centre to include a range of small scale units providing a range of community uses and top up provisions.
Brade Drive District Centre	1,000	New retail floor space should be focused around new A1-A5 uses and other non-retail uses. This should be delivered in small scale units to support local needs and help diversify the centre's current offer.
Jardine Crescent District Centre	500	New floor space to be provided as part of mixed use schemes within amended centre boundary A1-A5 uses to be provided, which reflect the existing character of the centre.

2. The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area.
3. Further retail provision at Arena Park Major District Centre will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider parks tourism functions.

Of greatest importance is the city centre and the need to strengthen its role at the top of the centres hierarchy. This is to be achieved through a range of retail based regeneration schemes at City Centre South, Friargate and the longer term aspiration at City Centre North. In addition a new food superstore is identified to support the city centre, an offer which has been missing since the closure of the Co-Op store in 2004. This will support other town centre proposals such as the new City Centre sports and leisure destination, new hotels and office provisions. These will all be delivered through the City Centre Area Action Plan.

Other notable allocations include the redevelopment of the Cannon Park Major District Centre in a similar format to that previously granted planning consent in 2008. Alongside recent planning consent for a new, smaller convenience store, this would see the size of the existing convenience offer significantly increased to support growth in the population around the Canley area of the city. When bringing this scheme forward however, specific care will need to be given to the highway impacts and issues that exist in the immediate vicinity.

Additional floor space is also to be delivered at Jardine Crescent to help grow and diversify the centre to meet local needs within smaller units that reflect the existing character of the District Centre. Like other centres across the city, this provides a focus on smaller units with an average floor space of 115sq.m and no single units larger than 457sq.m.

New floor space is also proposed at Brade Drive District Centre to support housing delivery within the surrounding area and to help diversify the retail offer. This will also include a changing of the centre boundary to help focus new provision alongside existing units and promote a more compact centre.

The Riley Square aspect of the Bell Green District Centre has been a longstanding concern due to high vacancy rates and a poor quality built environment. Policy R1 therefore makes provision for the complete redevelopment of the area to ensure the centre is suitable to meet the future needs of the local area. Given the existing constraints associated with the centre though, this will need to be brought forward in accordance with a comprehensive masterplan which makes provisions for replacement housing and retail floor space as well as significant improvements to both the built and natural environment. This may result in changes to the layout of the District Centre boundary and the retail footprint. Proposals should however ensure that new retail provision remains focused close to the junction of Roseberry Avenue and Henley Road to ensure it remains well connected to the wider District Centre and prevents the creation of a split centre.

Three new centres are also identified to support the new urban extensions and ensure small scale local provisions are made to support existing need and new communities within the North West area of the city.

When defining small scale local provisions evidence identifies that such units within similar Coventry centres would be between 36sq.m and 780sq.m, although the upper limit is influenced by a small number of larger units which are largely utilised for convenience goods. This is emphasised by 88% of units in the city's local centres being below 250sq.m. The new small scale provisions referred to in Policy R1 should therefore reflect this range of unit sizes, with no one unit exceeding 800sq.m. This will ensure a flexible and varied unit offer to help meet local needs.

With regards to the Arena Park Centre the Shopping and Centres Study raised concern that the centre is in danger of competing with the city centre rather than complementing it. Following its allocation and subsequent development in the 2001 Development Plan the centre has grown significantly over 2 phases containing one of the country's largest superstores as well as a range of restaurants and retail warehouse provision. Reflecting this growth the Local Plan has defined a centre boundary for Arena Park for the first time, which is shown on the Policies Map. Although the role of this centre in supporting the Ricoh Arena as one of the city's key visitor destinations will need to be managed during the plan period, the provision of new retail floor space will not be supported unless it is shown to have no further impact on the city centre or is an essential element of supporting the viability or operational functions of new tourism facilities. In this context new proposals will also be considered against policy JE6 of this plan.



## Other Town Centre Needs

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In addition to retail needs the Shopping and Centres Study also assesses the need for other main town centre uses. For the avoidance of doubt this conforms with the NPPF and considers the following uses:

- Leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls);
- Offices; and
- Arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

The Shopping and Centres Study concludes there is potential for Coventry to increase its market share of cinema trips meaning it could support an additional cinema. It also highlights that there could be scope for about two additional health and fitness clubs by 2031. In contrast, it suggests there is no quantitative need for additional theatre facilities, tenpin bowling, bingo or nightclubs. However, qualitative improvements should not be discouraged within designated centres.

In response to this level of need, existing permission already exist for a new city centre cinema as part of the City Centre South proposals, whilst further health and fitness facilities are planned at Bishop Street and as part of the proposed City Centre Sports and Leisure Destination. Any further proposals for Main Town Centre uses will be considered in accordance with Policies R3 and R4 of this Plan.

## Coventry's Centres Hierarchy

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The NPPF supports the identification of designated town centres as well as a centres hierarchy. The centres hierarchy in Coventry has evolved over time and is refreshed further through the policies in this Local Plan. This reflects the need to promote a vibrant and viable centres hierarchy that is able to respond to the changing needs of local communities.

Coventry city centre will remain at the top of the centres hierarchy. It is the main comparison shopping destination and the main focus for employment, leisure, entertainment and cultural activities. However, investment within the city centre has not kept pace with development in district centres and retail parks or other competing towns and cities such as Birmingham, Solihull and Leicester. This is highlighted by the city centre ranking 58th on the national ladder (according to the venue score index), with Leicester ranked 17th and Birmingham ranked 3rd. This is despite the city being classed the 13th largest in the country and the fastest growing outside London. With this in mind there is a clear need to invest in the city centre's retail offer to strengthen its role at the top of the hierarchy. Alongside this Local Plan, the Council will also adopt a City Centre AAP which will consider the city centre and its specific policies in more detail. Although the wider city centre boundary is shown on the Policies Map<sup>5</sup>, the Primary Shopping Area and primary and secondary frontages will be designated through the Area Action Plan.

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<sup>5</sup> This is the area that will be covered by the City Centre Area Action Plan

## Policy R2: Coventry City Centre – Development Strategy

- 1.** The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by:
  - a.** Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play;
  - b.** Enhancement of its retail and leisure offer to strengthen the city's sub-regional role;
  - c.** Provision of high quality office space;
  - d.** Becoming a hub for education;
  - e.** Including a variety of places to live which cater for different needs;
  - f.** Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;
  - g.** A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;
  - h.** Accessible for all;
  - i.** Providing an attractive and safe environment for pedestrians, cyclists and motorists;
  - j.** Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;
  - k.** High quality sustainable built design;
  - l.** Continuing to develop a vibrant and attractive night time economy;
  - m.** Providing opportunities to improve health and wellbeing;
  - n.** Continuing to support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan;
  - o.** Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch;
  - p.** Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible.
- 2.** An Area Action Plan will be developed to help deliver this strategy and support and guide development within the city centre.

It is not only the investment in the city centre that requires consideration though; it is also the management of the centres' hierarchy as a whole to ensure it supports rather than competes with the city centre. In considering the centres hierarchy it has become clear that a number of changes are required to ensure it remains fit for purpose and continues to serve the people of Coventry and its wider catchment in the most appropriate way.

For example Ball Hill lacks a major supermarket anchor associated with a Major District Centre and suffers from a lack of expansion opportunities brought about by its linear nature and surrounding residential provision. In contrast a new centre at Brandon Road, Binley was allocated in the 2001 plan and has now been developed as a high quality modern retail hub for the south east corner of the city. This has been linked to the adjacent supermarket, providing it with it strong convenience anchor and now serves the role of a Major District Centre as opposed to its previous district centre designation.

In terms of Local Centres, one additional centre is to be added to the hierarchy. This is situated at Bannerbrook Park, Banner Lane and reflects recent developments in the area. Its designation as a new

Local Centre will ensure it continues to provide a high quality local facility for the local community.

In addition, boundary changes are proposed at:

- Brade Drive District Centre to provide a more focused centre boundary and support the linked diversification of the centre;
- Daventry Road District Centre, to include the new supermarket;
- Foleshill District Centre to reflect recent growth of the centre.
- Jardine Crescent to support modest expansion of the centre and the redevelopment of vacant sites;
- Ansty Road Local Centre, to include adjoining community facilities;
- Holbrook Lane Local Centre, to include the existing petrol filling station;
- Longford Road Local Centre, to include adjoining community facilities; and
- Radford Road Local Centre, to include adjoining community facilities.

As part of the city's wider growth strategy two urban extensions are planned for the North West of the city. The Shopping and Centre Study has highlighted that this particular part of the city is underprovided for in terms of convenience retail offer. This reflects the relatively low population density present in that area of the city and the lack of existing centres. With this in mind, a Major District Centre is proposed as part of the Eastern Green urban extension, which will benefit from excellent links to the A45. However; in designating this, lessons must be learnt from the Arena Park development and the centre will not be allowed to expand beyond the strict provisions of Policy R1. This seeks to ensure any provisions within the centre over and above the convenience floor space are either locally aimed or support the city's needs for bulky goods retail. With regards the Keresley urban extension two new local centres are proposed, one to the south of the development and a second towards the north helping to promote sustainable development, active travel and community provisions. As these areas are yet to be developed the exact nature of the centre boundaries will be initially defined through the relevant supporting Master Plans (as required through policy H2). These boundaries will then be formally considered through the next Local Plan review. For the avoidance of doubt however any retail proposals that divert from the allocations in policy R1 will be considered to be out of centre and will be considered in accordance with policy R4 of this Local Plan.

Healthy town centres usually have a good mix of higher and lower order comparison goods shops and a balance between Class A1, A2 and Class A3 to A5 uses to ensure a flexibility of offer and a vibrancy and vitality. The 2001 plan encouraged at least 85% of units within any given centre to be retained as class A1. The changing face of retail and the functions of centres has seen a decrease in the percentage of A1 uses. The average proportion of A1 uses across Coventry centres is just over 50% compared to a UK average of around 58%. The retention of a majority A1 function continues to be an important element of supporting the longevity of centres. However, with the city's vacancy rates above the national average and greater flexibility within the use class order, the greater importance rests with the A-use class category as a whole ensuring units are occupied. As such, there will be no threshold applied to A1 uses within centres; however, the Council will require designated centres to retain a majority of provision within the 'A' use class category (Class A1-A5 of the Use Classes Order). It will also be essential to maintain an appropriately balanced range of 'A' class uses. This should be considered in the context of Policy R5. As part of diversifying centres alternative uses including social, community and leisure provisions will be supported as will new residential provisions, where it does not undermine the overall functionality of the centre.

This approach will not relate to the city centre, which will be considered separately through the City Centre AAP.

## Policy R3: The Network of Centres

1. To support the city centre, the Council will designate, enhance, maintain and protect a network of Centres consisting of Major District Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment.
2. In all these Centres:
  - a. A balance will be sought between shops (Class A1), and other Main Town Centre and community uses in order to protect the vitality and viability of the centre as a whole;
  - b. Proposals that reduce the concentration of A-class uses within a centre below 51% will not be approved;
  - c. A residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre;
  - d. Improvement to the environment and accessibility will be promoted and encouraged.
3. Major District Centres are shown on the Policies Map at:
  - a. Arena Park;
  - b. Cannon Park;
  - c. Brandon Road;
  - d. Eastern Green.

They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city for:

- e. a mix of bulk convenience and comparison shopping as well as service and catering uses;
  - f. social, community and leisure uses including hotels;
  - g. offices.
4. District Centres are shown on the Policies Map at:
  - a. Ball Hill;
  - b. Bell Green;
  - c. Brade Drive;
  - d. Daventry Road;
  - e. Earlsdon;
  - f. Foleshill;
  - g. Jardine Crescent;
  - h. Jubilee Crescent.

They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable.

**5. Local Centres are shown on the Policies Map at:**

- |                               |                            |
|-------------------------------|----------------------------|
| <b>a.</b> Acorn Street;       | <b>n.</b> Holyhead Road;   |
| <b>b.</b> Ansty Road;         | <b>o.</b> Keresley North;  |
| <b>c.</b> Baginton Road;      | <b>p.</b> Keresley Road;   |
| <b>d.</b> Bannerbrook;        | <b>q.</b> Keresley South;  |
| <b>e.</b> Barkers Butts Lane; | <b>r.</b> Longford;        |
| <b>f.</b> Binley Road;        | <b>s.</b> Quorn Way;       |
| <b>g.</b> Birmingham Road;    | <b>t.</b> Radford Road;    |
| <b>h.</b> Broad Park Road;    | <b>u.</b> Station Avenue;  |
| <b>i.</b> Charter Avenue;     | <b>v.</b> Sutton Avenue;   |
| <b>j.</b> Far Gosford Street; | <b>w.</b> Walsgrave Road;  |
| <b>k.</b> Green Lane;         | <b>x.</b> Willenhall;      |
| <b>l.</b> Hillfields;         | <b>y.</b> Winsford Avenue. |
| <b>m.</b> Holbrook Lane;      |                            |

They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable.

## Out of Centre Proposals

The city's designated centres are generally the focus for retail and other town centre uses, however, there are a range of shops and services across Coventry which are not located in a defined centre. Whilst retail and leisure investment is not encouraged outside of the centres hierarchy, it is recognised that there may be occasions when proposals for uses outside defined centres are considered suitable and acceptable. This reflects the NPPF's approach to centres first and where this cannot be accommodated the consideration of out of centre proposals through a Sequential Assessment and impact test.

To support this policy the Council have undertaken a thorough review of existing retail provisions to help understand what sort of proposals would warrant consideration through a Sequential Assessment and Impact Test. The NPPF requires a Sequential Assessment for all main town centre proposals outside of a designated centre, but sets a threshold of 2,500sq.m for impact Tests. Both thresholds can be changed through respective local plans when having regard to local circumstances and evidence.

Having regard to the difficulties and pressures facing Coventry's hierarchy of centres and the pressures it faces competing with out of centre retail parks and neighbouring towns and cities there is clear justification to retain a 'catch all' threshold for Sequential Assessments. In terms of Impact Tests, the council have considered the average size of units throughout the hierarchy as well as the sort of proposals that have come forward for planning considerations in recent years. This has supported an understanding of the sort of proposals that could be expected and at what level they could have an impact on the units within designated centres. The Council's monitoring has identified an average unit size across all centres of 362sq.m, although this does decrease to 220sq.m when the city centre is excluded. In turn the average unit size within the city centre is 457sq.m. This reflects the city's broad centres profile of smaller units linked to a scattering of larger anchor style units. In general the profile of recent out of centre proposals varies from approximately 120sq.m to 1,700sq.m. With vacancy rates remaining high and centres remaining under pressure it is therefore considered justified to introduce a threshold for impact tests below that identified in the NPPF. Based on the evidence available it is clear that the city's existing designated

centres are focused around smaller units, with 88% of all stores outside of the city centre below 250sq.m in size, highlighting the greater likelihood for impacts to be felt in smaller units. Although this figure drops to 74% inside of the city centre, there is still a clear focus on smaller units. Notwithstanding, the city's out of centre retail parks, which would be the most likely focus for out of centre proposals, contain units which average around 900-1,200sq.m in size. As such, the evidence base suggests that on balance a threshold of 1,000sq.m would be appropriate to apply for impact tests across Coventry. This will ensure impacts on smaller units are considered whilst also placing greater emphasis on the average unit sizes within the city centre, where the greatest importance exists.

## Policy R4: Out of Centre Proposals

1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).
2. Sequential Assessment
  - a. A Sequential Assessment will be required for all retail and other Main Town Centre use proposals outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3.
  - b. Where in-centre options are exhausted, edge of centre locations (within 300m of a centre boundary) that are well connected and accessible to the centres themselves should also be considered in advance of out of centre sites.
3. Impact Test
  - a. An Impact Test will be required for all retail and other Main Town Centre use proposals outside a defined centre that exceed 1,000sq.m (gross) floor space. The Assessment of Impact should be prepared in accordance with national guidance and consider the potential impact on the vitality, viability, role and character of a defined centre(s) within the centres hierarchy (as set out in policy R3).
  - b. Catchment areas for Sequential Assessments and Impact Tests will be considered on a case by case basis to reflect the specific proposals being considered.

National Guidance is not clear how proposed extensions to existing out of centre Main Town Centre uses should be considered. There is clear local evidence however that in order to strengthen the cities centres hierarchy that out of centre provisions should be limited. As such, the same approach is to be applied to proposals for the extension of existing units (including the introduction of mezzanine floors). This means that all proposals will remain subject to the Sequential Assessment, which should consider the amount of floor space to be created by the extension. An Impact Assessment will be required where the amount of new floor space proposed to be created exceeds the 1,000sq.m threshold

Where proposals are made to merge or sub-divide existing out of centre premises or to vary existing conditions which restrict the sale of particular goods, the proposals will be treated in the same way as if they were new units. This again reflects the sensitivity of floor space provision and unit sizes across the city and the impact such change in market offer could have on the wider centres hierarchy. A prime example exists in a range of out of centre retail parks and lower order centres where the floor space of units and the sale of particular products are restricted to minimise direct competition with the city centre. This is also an important consideration in terms of functionality and the overall role of the centre or out of centre location.

When considering Sequential Assessments and Impact Tests for an out of centre proposal consideration must be given to existing, committed and planned public and private investment within a defined centre that exists within an agreed catchment area of the proposal. These will be considered on a site by site basis having regard to the location, size, scale and intended customer base of the proposal.

Further consideration can however be given to the type of the proposal, its intended market area, drive time and access to both the highway and public transport. When considering investment proposals which are not complete, consideration should be given to likely delivery timeframes and whether or not it will be completed and readily available within 5 years from the date of the application. Assessments should also have regard to any existing out of centre locations and out of centre proposals that already benefit from planning permission, but are yet to be completed as notwithstanding their out of centre nature they still represent private sector investment in the city's wider retail offer.

Furthermore and in accordance with national guidance, land ownership matters are not considered sufficient justification for preferring out-of-centre or edge-of-centre sites over those within defined centres, applicants should also demonstrate flexibility on issues such as format and scale when undertaking Sequential Assessments.

For the avoidance of doubt, Policy R4 does not apply to office development falling within Use Class B1 of the Town & Country Planning Use Classes Order 1987 (as amended) as such proposals will be assessed against Policy JE5 of this Plan.

## Retail Frontages and Ground Floor Units in defined centres

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Designated centres have been identified on the basis of their function and role within local communities, with a primary purpose of making retail and shopping provisions available to their local community in a sustainable and accessible way. The role and offer of centres is changing though and the need for flexibility is becoming increasingly important. This is particularly true within Coventry where vacancy rates are relatively high. Therefore, with the exception of the city centre there are no plans to designate primary or secondary retail frontages. The importance of the city centre at the top of the centres hierarchy and the need to promote the city centre as the focal point for A1 retail means primary and secondary frontages remain important to identify. These will be managed through the City Centre AAP.

When considering uses within the centres hierarchy this is generally focused towards the ground floor of units. As such, the ground floor element of these units is of primary importance as they offer the 'shop windows' for the centre.



## Policy R5: Retail Frontages and Ground Floor Units in defined centres

1. Proposals to use ground floor units within defined centres for non-A class uses will normally be permitted provided that:
  - a. the primary retail function of the centre would not be undermined in the context of Policy R3;
  - b. the use would make a positive contribution to the overall role, vitality and viability of the centre;
  - c. the use is compatible with other Plan policies.
2. The impact of a proposal on the primary retail function of a centre will be determined on the basis of:
  - a. the location and prominence of the unit within the relevant frontage;
  - b. the width of the frontage of the unit when compared to other units in the centre;
  - c. the number and proximity of other units occupied by 'A' class uses;
  - d. compatibility of the proposal with nearby uses.

By considering the issues identified in Policy R5, such proposals will be assessed in the context of ensuring and maintaining a viable and vibrant centre with lively street frontages.

By way of prominence and size of the unit, consideration will need to be given to the character of the centre and how the unit in question compares to other units within the centre. For example, Coventry's defined centres are characterised by a concentration of smaller units supplemented by a small number of larger units that are more prominent in terms of size and frontage within the centre. They are also often 'anchor' type units within the centres and provide a principle focus and attraction. The change of use of such a unit is likely to have a greater impact in terms of prominence and frontage than the change of use of a smaller unit. Furthermore consideration will also need to be given to the lay out of the centre. This will need to have regard to whether the centre is a single grouping of units in a continuous row or if it is segregated by roads or open space etc. Where a centre is focused around more than 1 grouping of units, it should normally be the single grouping that is considered when examining the prominence of the unit. Where it is a single grouping the whole centre should be assessed.

It may also be important to consider the highway implications of non-retail proposals, especially if such proposals involve larger social or community provisions which may require significant car parking or concentration of activity at certain periods.

## Restaurants, Bars and Hot Food Takeaways

The creation of food and drink uses in classes A3, A4 and A5 have become increasingly flexible in recent years following changes in permitted development rights. This is especially true for restaurant uses (A3) and reflects the change and diversification of modern town centres.

## Policy R6 Restaurants, Bars and Hot Food Takeaways

1. Outlets should be located within defined centres and will normally be discouraged outside those locations.
2. Proposals within defined centres will be permitted provided they:
  - a. would not result in significant harm to the amenity of nearby residents or highway safety;
  - b. would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;

- c. are in accordance with the emerging Hot Food Takeaway Supplementary Planning Document (in particular, proposals for A5 uses); and
- d. are compatible with other Plan Policies.

The Council has pledged to improve its population's health and wellbeing and to reduce health inequalities. One of the challenges the Council faces in promoting healthy eating is the availability of foods high in fat, salt and sugar in local neighbourhoods, including the prevalence of hot food takeaways in some areas.

Such uses do, however, have the potential to cause significant problems with impact upon residential amenity, highways and parking. Hot food takeaways often attract considerable customer numbers and are regularly associated with issues such as litter, waste disposal, noise, odour, traffic and health. For a combination of these reasons, they will normally only be supported within defined centres where residential amenity is less likely to be an issue and will be resisted elsewhere. Where homes are situated above such premises, specific care will need to be given to odour extraction, noise insulation and general public convenience. Where appropriate provisions cannot be included then such uses will not be supported, even within designated centres.

## 6. Communities

### Relevant Evidence Base

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- The Coventry Council Plan (2015 update)
- Coventry Sports Strategy 2014-2028 (2014)
- Coventry City Council Indoor Facilities Strategy (2014)
- Coventry Aquatics Strategy (2014)
- Coventry University Masterplan
- University of Warwick Masterplan

### Introduction

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**This chapter considers social, community and leisure facilities that are not defined as Main Town Centre uses by the NPPF. These include provisions for sporting uses, including swimming pools, leisure centres and sporting venues, health centres and hospitals, educational establishments including nurseries and universities, meeting places, libraries and places of worship.**

The policies in this chapter set out the approach to safeguarding and improving social, community and leisure premises and providing support for the development of new facilities where there are identified gaps in provision. The policies will support and facilitate the implementation of existing and future strategies for the provision and improvement of social community and leisure premises across Coventry.

The NPPF also promotes the creation of healthy communities and vibrant and viable town centres both of which help support local communities and provide a focal point for services over and above retailing facilities. The NPPF recognises that these two objectives can complement one another by providing for social, community and leisure uses within designated centres. Indeed the provision of such facilities can make significant contributions to the diversification of designated centres, helping to promote sustainable development and sustainable travel through the creation of linked trips and mixed use developments.

The Council will encourage applications that promote the re-use of existing facilities which support and enhance existing local communities, with a view to protecting those particular features of the neighbourhood valued by its residents.

## New or improved social and community premises

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In providing social, community and leisure services the NPPF requires local authorities to plan positively for the provision and use of shared spaces, community facilities (such as meeting and sports venues, cultural buildings and places of worship) and other local services to enhance the sustainability of communities and residential environments. In doing so Local Plans should guard against the unnecessary loss of valued facilities and services, allow established facilities to develop and modernise in a sustainable way and ensure that the location of housing, economic uses and community facilities and services are considered and promoted in an integrated way.

New cultural and community premises (as outlined below) will therefore be considered in accordance with the sequential approach set out in policy CO1. This is with a view to locating facilities in defined centres makes them easily accessible by foot, bicycle or public transport and fully accessible by all sections of the community and facilitating more integrated communities. They should be provided in buildings and facilities which are flexible and adaptable to communities' needs and sited to maximise the shared use of premises to facilitate their longevity.

## Local Health Provisions

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To support the University Hospital a range of health provisions have been retained and developed at the City of Coventry Health Centre, Stoney Stanton Road, whilst other new health facilities have been provided across Coventry. As the city's population continues to grow and the needs of the population change in terms of an ageing population, the Council will continue to work with the Coventry and Rugby Clinical Commissioning Group (CCG) and The University Hospital Coventry and Warwickshire NHS Trust. Although the city's population will remain one of the youngest across the sub-region it is still expected to age, and as such it will be important to ensure new facilities are easily accessible to those who need them.

## Cultural and Community Buildings

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Such facilities include sporting uses, including swimming pools, leisure centres and sporting venues, meeting places, libraries and places of worship.

The Council will seek to bring forward the recommendations of its Sports Strategy and its supporting documents to inspire more people to take up and regularly take part in sport; provide a range of high quality sporting opportunities; and to provide a range of modern, accessible and high quality sports facilities. This has already started with the delivery of the new swimming facility at the AT7 Centre and the planned city centre Leisure Destination. The Council is also committed to maintaining a library provision across the city as well managing an appropriate level of other community halls and buildings.

The provision of places of worship will need to be carefully considered having regard to the needs of local communities and faiths.

## Universities, Schools and Educational Facilities

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Coventry's education offer is varied and successful, with a range of improving primary and secondary schools, supported by strong colleges and two of the countries most respected universities. In addition to a number of private institutions the city offers a range of State-funded schools including local authority maintained schools (community, foundation and voluntary aided and controlled schools).

In order to support sustainable development the Council recognises the importance of maintaining an adequate and appropriate supply of education provision. Opportunities should be taken to ensure schools are located in sustainable locations that complement neighbouring uses. They should be within easy access of local communities as well as offering opportunities to generate linked trips by being located

close to other social and community provisions and local retail and service offers as well as being easily accessible by a range of transport options.

Where possible schools and their grounds should be utilised for other community provisions such as social, cultural, leisure and indoor sports facilities. This will help to develop a schools position at the centre of the community with significant benefits to local residents. It can also help ensure the effective use of resources and help minimise travel distances for users.

The Council will continue to work with both universities to enable on-going development of their masterplans. This collaborative working will help to facilitate future development proposals and ensure they are in harmony with the overall aims of regeneration, education and investment in Coventry and the sub-region.

## **Policy CO1: New or improved social community and leisure premises**

- 1.** Proposals for social, community and leisure facilities will be considered through the following sequential approach:
  - a.** Designated centres to support the centres hierarchy;
  - b.** Where no suitable sites are available in a designated centre, an edge-of-centre location;
  - c.** Where no edge of centre sites are available, a site adjacent to other associated facilities including existing schools and educational facilities;
  - d.** Only where no suitable site can be identified having regard to points 1-3, will stand alone sites be supported, subject to:
    - i.** The proposal addressing an unmet need within a local community;
    - ii.** There being no significant adverse impact upon the role of a defined Centre;
    - iii.** There being no material impact on neighbouring amenity;
- 2.** Proposals will be considered on the basis of:
  - a.** The appropriateness of their proposed location in relation to their scale and intended catchment;
  - b.** Compatibility with nearby uses;
  - c.** Accessibility by a choice of means of transport;
  - d.** Compatibility with other Plan Policies.
- 3.** Where proposals are in accordance with the approved Masterplans for Coventry University or the University of Warwick they will normally be approved subject to high quality design proposals.

To support compatibility with nearby uses community premises should be appropriate to their surroundings in terms of scale, character and mix of uses, and should not harm residential amenity, the environment, or result in adverse transport impacts in line with other relevant policies. Some facilities within residential neighbourhoods can have an impact on residential amenity which may need to be carefully managed. For example the hours of operation will need to be balanced against the needs of service providers and users of the premises against impacts on neighbouring residents. Planning conditions will be used, as appropriate, to mitigate potential adverse amenity impacts.

Proposals should promote active frontages and encourage linked trips and shared services wherever possible. They should satisfy the above sequential approach in order to ensure that centres remain as the focus for not only retailing but also community uses, which ensures that the centre has a diverse mix of uses and addresses where appropriate any unmet local need. It will also be important to locate

these provisions in the most sustainable places relevant to the proposed use to generate linked trips and promote sustainable communities.

It is recognised that there may be occasions where a proposal is not suitable for an in-centre use. This may be due to a number of factors including space requirements, neighbouring uses or local amenity. The Council will require evidence and justification for the reasons why centres have been discounted and why similar uses such as educational facilities, for example, cannot be located in the same locations.

## Re-Use of or Redevelopment of Facilities

There may be circumstances where an existing facility ceases to operate and a site becomes vacant. Under such circumstances the first consideration will be whether there is still a local need for services currently or last provided on that site.

### Policy CO2: Re-Use of or Redevelopment of Facilities

1. Proposals for the re-use or redevelopment of community premises for a use outside the scope of this policy will not be supported if:
  - a. There is an outstanding local need which could reasonably be met at that location;
  - b. The site remains viable for existing uses or could be made viable through appropriate diversification of use;
  - c. the proposal is not compatible with nearby uses.
2. In all cases consideration should be given to the suitability of the location for such facilities having regard to other Policies in this plan and its supporting documents
3. Where replacement facilities are intended, they should:
  - a. continue to serve the community;
  - b. be of appropriate scale and character;
  - c. be of high quality design.

In order to demonstrate that there is no further need or demand for a building to support social, community or leisure use, applicants should undertake the following measures as a minimum:

- Where appropriate, seek confirmation in writing from the relevant agency that the proposed loss of premises is consistent with the agreed strategy for delivery of that service in the local community and city as a whole;
- In accordance with Appendix 2 of the Local Plan, market the land or premises for D1 or D2 use continuously for a period of at least three months;
- Close to the beginning of the marketing period, notify the Council of the proposed vacancy, so that community organisations, arts, sports and cultural groups seeking premises can be made aware of it.

Proposals involving the loss of land in use, or previously in use, by an education facility will only be supported, if it is clearly demonstrated to be surplus to educational requirements and its development for other uses would contribute to improvements in the delivery of school places in the city.

Where replacement facilities are intended, they should be located in accessible locations. The quality of new provision should be equivalent to or exceed what is being replaced.

Where premises have been registered with the Council as assets of community value under the Localism Act 2011, this will be a material consideration in the determination of applications for change of use to non-community related use.

## Neighbourhood and Community Planning

The Localism Act and NPPF provide the framework for Town or Parish Councils and defined neighbourhoods across Coventry to engage in community and neighbourhood planning. This can include a host of activity including Neighbourhood Plans, Parish Plans or other forms of design guidance etc. Where local neighbourhoods wish to engage in the development of local planning policy the Council will help support this process and work with communities to achieve their planning aims, where these are in conformity with the NPPF and the strategic policies of this Plan. Once adopted, a Neighbourhood Plan will form part of the statutory development plan and must be taken in to account in making planning decisions in that locality. Once proposed they will also be referred to within the Council's Local Development Scheme.

### Policy CO3: Neighbourhood and Community Planning

1. Where appropriate the Council will support communities in the preparation of:
  - a. Parish Plans;
  - b. Parish Design Statements, and;
  - c. Neighbourhood Plans.
2. When preparing these plans they must remain in accordance with national legislation, this Local Plan and any other city wide planning documents which support it.
3. Where appropriate the Council will support the application and designation of land or buildings as Assets of Community Value.
4. The Council will not support applications for Neighbourhood, Parish Plans or Assets of Community Value where they conflict with this Local Plan or supporting documentation.

The Council considers that local communities taking an active role in determining the future for their neighbourhoods is a key part of achieving sustainable communities and these are processes which make a difference in bringing forward development in a way that is consistent with local needs and aspirations.

At the current time one neighbourhood plan area has been designated at Willenhall and work on a Neighbourhood Plan for the area remains on-going. Coventry has three Parish Councils at Keresley, Finham and Allesley, which have the autonomy to prepare either a Parish Plan or Neighbourhood Plan.

The designation of land and buildings as Assets of Community Value was also introduced through the Localism Act. Since its introduction three assets have been designated:

- the listed building at 449/449A Foleshill Road
- the former Coventry Loop Railway Line area of open space.
- The White Lion Public House, Brownhill Green

Such designations are considered important to protecting non-statutory heritage assets and retaining important buildings and areas of land within local communities.

# 7. Green Belt and Green Environment

## Relevant Evidence Base

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- Coventry Green Belt Review (2007)
- Coventry and Warwickshire Sub-Regional Green Belt Study (2009)
- Coventry Green Space Strategy (2010)
- Coventry and Warwickshire Sub Regional Green Infrastructure Study (2011)
- Coventry and Warwickshire Joint Green Belt Review (2015)
- Coventry Green Belt Ecology and Biodiversity Study (2015)
- Agricultural Land Classification (2009)
- Coventry Play Pitch Strategy (2014)

## Introduction

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**The chapter establishes a new approach to how Coventry's green environment will be planned, maintained, protected and enhanced. It will present opportunities to create more sustainable development and patterns of growth that will help meet Coventry's development needs, whilst seeking to protect the city's highest value and most sensitive green spaces. The chapter will also cover all aspects of the city's green environment including the Green Belt, green spaces, environmental designations and protected trees.**

## Green Belt

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The most important attribute of Green Belts is its openness and purpose of restricting urban sprawl. There are 5 main purposes of Green Belt and these are identified in the NPPF.

The use of land in Coventry's Green Belt also has a positive role to play in fulfilling the following objectives, through active countryside management:

- Retaining land in agriculture, forestry, and related open uses;
- Providing access to the open countryside and green corridors for the urban population, linked to the surrounding countryside of Warwickshire and Solihull;
- Providing opportunities for outdoor sport and recreation near urban areas;
- Protecting and enhancing attractive landscapes, including the Ancient Arden landscape, green corridors, and landscapes near to where people live;
- Securing biodiversity and nature conservation interests; and
- Improving damaged and despoiled land.

The city has two distinctive types of Green Belt – the open countryside of Ancient Arden on its western boundary, predominantly used for agriculture and quiet, passive leisure; and Green Belt corridors, which are extensive and continuous tracts of open land that extend through the built-up area of the city, to and from the countryside beyond.

Of greatest prominence is the wider Green Belt that encircles the city, helping prevent urban sprawl and ensuring Coventry does not merge with surrounding towns, villages and cities. This has been a key aspect of the Joint Evidence Base and the DtC. Given the growth pressures facing Coventry and its wider HMA



however, there has been a strong need to explore the most sustainable and appropriate opportunities to expand the city. Through the consideration of evidence and joint working on the DtC a number of development options have been identified within the city's Green Belt. Where development is brought forward on Green Belt land however, the Council will seek to ensure high quality design and the creation of high quality environments within which local people will choose to live. A prime example of this is the Council's Ancient Arden Design Guidelines which will be applied in order to protect the visual amenities, local distinctiveness and character of the Green Belt, whilst also supporting sustainable development. These guidelines will form the basis of the Council's Sustainable Urban Extension Design Guidance SPD.

The Green Belt corridors have particular value in environmental quality within urban areas, assisting nature conservation and providing people with access to the open countryside around the city by walking and cycling but have been shown, through evidence, to not fulfil the purposes of Green Belt.

Historically, the development of Coventry has occasionally led to industrial and commercial buildings being constructed within areas now designated as Green Belt. Although it may be preferable, it is sometimes unviable for such sites to be redeveloped for more appropriate Green Belt uses. Rather than seeing them become neglected, and to protect the employment land portfolio, the opportunity will be taken to improve their impact on the Green Belt.

To that end, an assessment of the Green Belt has concluded that the sites listed in Policy GB1 present significant opportunities for development. The Green Belt boundaries are therefore amended to enable sensitive, appropriate development of these sites to support the city's housing and employment needs. These are also identified on the policy map.

## Coventry's Exceptional Circumstances

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The administrative boundary of Coventry is tightly defined with many parts of the existing urban area abutting this boundary. Based on the latest evidence (from the ONS), Coventry is recognised as having the fastest growing population outside Greater London. The SHMA (2015) highlights Coventry's objectively assessed housing need to be at least 42,400 homes to 2031. Having undertaken a comprehensive review of the Green Belt together with a full analysis of other relevant evidence, it has become abundantly clear the Council cannot physically accommodate all of this need within its administrative area let alone its existing urban area.

Indeed, the constructive and on-going discussions through the Duty to Co-operate (DtC) process has enabled the Council to understand that all development needs of the Housing Market Area cannot be accommodated in the existing urban areas of Coventry and Warwickshire. All Local Planning Authorities in Coventry and Warwickshire have therefore committed to considering their Green Belt boundaries through their respective Local Plans.

The NPPF is clear that housing need (market and affordable) must be met in full. Through the findings of the Sustainability Appraisal and in taking these findings on board, the Council has considered realistic alternative options through the Local Plan and the DtC. The city also has clear issues in terms of a skewed existing housing stock and there is a need to diversify this in a viable, realistic and deliverable way. However, larger family housing is typically lower density than apartments and the existing housing developments seen within Coventry's existing urban areas and so in order to meet the housing needs of local people and ensure a deliverable and achievable Local Plan, it is acknowledged that an element of Green Belt land is required to meet these development needs. Although some of these larger, higher value homes can and will be delivered within the existing urban area and on non-Green Belt land, existing Green Belt land is required to make real inroads into the diversification of the city's housing offer and meet the city's housing needs.

The city's tight boundary also means land is depleting from an employment land supply perspective. In-commuting to Coventry for work has increased substantially in the last decade, placing pressure on sustainable travel patterns and air quality. The city must do something to reduce in commuting and

rebalance its housing/employment offer. It must provide employment land to stimulate economic growth, however the balance of need and supply means this must also utilise Green Belt land.

Moreover, without the release of land for development that is currently in the Coventry Green Belt, it is highly unlikely the Council would be in a position to demonstrate a continuous five year supply of housing land or a continuous reservoir of employment land over the medium and long term time horizon of the plan period. Indeed, the need for housing in general and affordable housing in particular, are matters to be given very substantial weight. Paragraph 89 of the NPPF confirms that affordable housing is an issue of sufficient weight for it potentially to be an exception to normal Green Belt policy.

## Policy GB1: Green Belt and Local Green Space

- 1.** The city's most up-to-date Green Belt and Local Green Space boundaries are identified on the Policies Map.
- 2A:** Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy.
- 2B:** Within areas designated as Local Green Space, the erection of small buildings and structures which are ancillary to the primary use of the land may be acceptable. Other development will not be permitted unless very special circumstances are demonstrated.
- 3.** The following areas will be removed from the Green Belt to accommodate future development needs and are shown on the Policies Map. Where appropriate further details are provided in Policy JE2, H2 and HE3;
  - a.** Land part of the Wood End redevelopment (residential)
  - b.** Land at Sutton Stop (residential and employment)
  - c.** Land south at Walsgrave Hill Farm (residential)
  - d.** Land at Keresley (residential)
  - e.** Land north of Upper Eastern Green (residential and employment)
  - f.** Land at Cromwell Lane (residential)
  - g.** Land at Mitchell Avenue (residential)
  - h.** Land off Allard Way/London Road (residential)
  - i.** Land at Cheltenham Croft (residential)
  - j.** Land east of Browns Lane (residential)
  - k.** Land west of Browns Lane/Burton Close (residential)
  - l.** Land at Cryfield Heights (residential)
  - m.** Land at Woodfield School, Stoneleigh Road (Residential and infrastructure)
  - n.** Land south of Blue Coats School (Heritage and Education)
  - o.** Land at Baginton Fields and South East of Whitley Business Park (employment)
  - p.** Land to the east of the existing Energy from Waste plant at Bar Road (general industrial)
- 4.** The following areas will be removed from the Green Belt and re-designated as Local Green Space and are shown on the Policies Map:
  - a.** Sowe Valley
  - b.** Sherbourne Valley

- c. War Memorial Park
  - d. Tocil Wood Brook Stray
  - e. Park Wood and Ten Shilling Wood
  - f. Tile Hill Wood
  - g. Allesley Park
5. The following areas will be removed from the Green Belt and will not be re-designated as Local Green Space as they do not serve the purposes of either:
- a. Land at Park Hill Lane
  - b. Land at Westwood School and Xcel Leisure Centre
6. The following areas will be designated as new areas of Local Green Space and are shown on the Policies Map:
- a. Sowe Valley Northern Extension
  - b. Sherbourne Valley and Lake View Park
  - c. Walsgrave Triangle, Cross Point.
7. In addition to appropriate development in the Green Belt identified in the NPPF, limited infill development would be considered appropriate. Any proposal in these locations will be expected to be of an appropriate density to reflect surrounding properties should not impact negatively on the openness and character of the wider Coventry Green Belt and will also need to accord with Policy H3.

The NPPF requires changes to the Green Belt to be made through the Local Plan process. A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations, unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes.

In other words, the relatively poor performance of the land against Green Belt purposes is not, in itself, an exceptional circumstance that would justify release of the land from the Green Belt. The 2015 Coventry and Warwickshire Joint Green Belt Review recommended that the lowest performing parcels of Green Belt, or parts of them, could be considered for removal from the Green Belt. But the Green Belt review itself has not been considered in isolation. The Council have also considered the ecology and biodiversity value of sites, the agricultural land classification, infrastructure constraints and opportunities, and Historic Landscape Character. This information has also been brought together through Sustainability Appraisal to consider the most appropriate locations for sustainable development.

Development in these locations would effectively be ‘infill’ and/or controlled growth and would be well contained by existing significant features and the landscape. It would not be urban sprawl. In defining precise areas for removal, however, the Council has sought to minimise any harm to the remainder of the Green Belt by indicating the type of development (in terms of use class and density) that would be acceptable in these locations.

Furthermore, it is important to highlight that section 2 and 7 of policy GB1 sit in part at least alongside section 9 of the NPPF by considering appropriate and inappropriate development within the Green Belt. In this context it is important to draw links to the supporting text of Policy H2 in this Local Plan in so far as it relates to the appropriate delivery of local transport infrastructure within a Green Belt location.

## Designation of Local Green Space

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Much of the Green Belt within and close to the edge of the sub-region's urban areas plays an important role as 'green infrastructure'. This is particularly relevant in the pockets and corridors of Green Belt within Coventry (such as the Sowe and Sherbourne river valleys), which not only make the city a better place to live, but also increase the sustainability credentials of the city, promoting health and wellbeing, biodiversity and resilience to climate change. Despite their positive uses, these pockets and corridors of Green Belt have little connection with the wider countryside around Coventry and, partly as a result, make a more limited contribution to the Green Belt purposes.

This Policy re-designates these areas as 'Local Green Spaces'. The NPPF supports such an approach, although not specifically in relation to Green Belt land. A Local Green Space designation is appropriate 'where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife' (NPPF para. 77). This describes these parcels very well and, through any appropriate Local Plan policy framework, their protection could be secured as strongly as Green Belt.

In addition to the re-designation of these parcels and corridors, the Council's evidence base coupled with the feedback from previous public consultations, has been used to propose additional areas of local green space. These include land at Eastern Green, land north of the Sowe Valley and land at Walsgrave Triangle, Cross Point, which would provide an important buffer between any prospective residential and/or commercial development, whilst protecting land of high community value.

As part of the proposed two urban extensions at Keresley and Eastern Green, significant tracts of green infrastructure are proposed. Once established, these green corridors will be assessed to establish their value as additional areas of local green space. This approach will also be taken forward in relation to the land around Charterhouse Heritage Park (policy HE3), the employment allocations at Whitley Business Park and Baginton Fields (Policy JE2) and the housing allocation at London Road / Allard Way (Policy H2:9).

National Guidance requires development proposals within areas designated as Local Green Space to be considered against local policies which are consistent with policy for Green Belt. This principle is broadly accepted through Policy GB1, however it is important to consider the context of Green Belt policy against that of Local Green Spaces. Any development within Local Green Spaces should for example not impact on the initial purpose of land being considered as a locally important green space or impact negatively on criteria set out in Paragraph 77 of the NPPF. Of particular importance is land used for recreational and leisure use, especially sports pitches. It is acknowledged that some developments may be required to support the continued use of sites as high quality sports pitches (e.g. buildings for changing facilities and related teaching or training provisions) and this would be supported in principle. Other acceptable examples will include the provision of:

- new play equipment within parks and public spaces;
- appropriate and suitable parking facilities at parks and public spaces;
- appropriate lighting (in terms of scale and surrounding uses) to support sports facilities;
- the provision of appropriate and suitable footpaths and cycle ways to enhance accessibility to high quality green spaces.

In all cases development should be ancillary to the primary purpose of the Local Green Space. Should development prevent the continued use of land for sports pitches, or other forms of Local Green Space (as appropriate) this will not be supported.

## Safeguarded Land in the Green Belt

The NPPF sets the approach to defining the Green Belt boundaries. Its purpose is to help ensure that the Green Belt (as defined in this Plan) endures beyond the Plan period and that defensible boundaries are maintained.

Through the evidence base and the DtC process it has become apparent that Green Belt parcels straddle administrative boundaries. This is particularly true along the city's constrained southern boundary, where a number of land areas are separated through administrative boundaries. As such, when considered in isolation through the Coventry Local Plan the land in question is considered unsuitable for removal from the Green Belt due to the inability to create defensible boundaries that would endure beyond the plan period. When considered alongside development options within Warwick District however the land could provide longer term possibilities for the release of land from the Green Belt to support cross boundary development proposals in Warwick District. Given the nature of the areas involved though, the retention and delivery of infrastructure, most notably for highways, education or green spaces would be the main focus. This reflects the existing nature of these sites which largely comprise existing low density homes, existing education provisions or ancient woodland.

As discussed in the context of Policy DS1 and DS2 however, the Council cannot place undue pressure on neighbouring authorities to develop on specific sites. It can however put a mechanism in place that responds to potential longer term development options meaning its own Plan remains flexible and is able to respond to emerging circumstances in neighbouring areas. This also allows the Council to continue discharging its responsibilities through the DtC in an effective and continuous way.

Land along the southern boundary of Coventry is therefore intended to be designated as safeguarded land for consideration as part of the next Local Plan review. This will have explicit regard to development proposals within Warwick District that if brought forward for development over the course of this Plan period would create Green Belt policy 'islands' and therefore render the Green Belt policy designations in these areas inappropriate. In this context, these sites are safeguarded in so far as their long term designation as 'Green Belt' is dependent upon the development of adjoining land in a neighbouring local authority. As already highlighted, the sites themselves are largely utilised for a small number of low density homes, education provisions or undevelopable due to the presence of ancient woodlands.

Should such development proposals not materialise within Warwick District however, these sites will be considered for a formal return to the Green Belt due to the issues raised above.

### Policy GB2: Safeguarded Land in the Green Belt

1. The areas of Safeguarded Land proposed partly or wholly comprise the following sites and are shown on the Policies Map.
  - a. Land south of Westwood Heath Road;
  - b. Land south of Bishop Ullathorne School;
  - c. Playing Field south of Finham Park School; and
  - d. Land west of Finham Primary School.

Any development of these sites will be subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District.

Para 85 of the NPPF expressly mentions the opportunity to safeguard land within the Green Belt as part of a Local Plan. It is not however allocated for development at the present time and is instead identified for consideration through future Plan reviews. As such, planning permission for the permanent development of safeguarded land will only be granted following a Local Plan review which proposes the development. In this context, should cross boundary development proposals within Warwick District include the wider development of any of these areas as part of a comprehensive development proposal then the Council will consider the significance of this in relation to the sites and the wider proposals. The Council will then determine if a need exists to undertake a targeted review of its Local Plan in this regard. This would be in accordance with Policy DS1 of this Plan. Such an event would also trigger the review of the Council's Local Development Scheme with a view to supporting the delivery of cross boundary evidence or development plan documents (as appropriate) in accordance with Policy DS2.

Of particular relevance is the existing use and purpose of these sites. In this context the future review of these safeguarded areas is unlikely to trigger the comprehensive development or redevelopment of these areas. Instead it will respond to changes in Green Belt policy and seek to remove any cases of Green Belt islands having been created by adjoining development in Warwick District. This especially relates to the education facilities at Bishop Ullathorne and Finham Park (primary and secondary). In such cases development proposals must ensure that the city's education requirements continue to be met and where appropriate support sustainable accessibility to school places for residents of new homes.

The Council considers this approach will support sustainable development, support on-going commitment to discharging the DtC in this respect and the long term protection and management of the Green Belt to the south of the city.

## Green Environment

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### Introduction

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**A sustainable growth strategy relies on protecting and improving the quality of the environment. Future development must be located to maximise the efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned green infrastructure, so promoting sustainable development.**

The term green infrastructure refers to a strategic network of green and blue spaces, such as woodlands, parks, amenity landscaping, ponds, canals and rivers, and the links between them. In the Coventry context, enhancing and increasing green infrastructure is particularly important. The 2011 Sub-Regional Green Infrastructure Study produced a set of Green Infrastructure Standards for sustainable development.

High quality and well-connected green infrastructure has the potential to make Coventry a much more attractive and prosperous city, and a healthier place to live, work and enjoy, with multiple benefits for the economy, the environment and people. Local networks of high quality and well managed open spaces help to create urban environments that are attractive, clean and safe, and can play a major part in improving people's sense of wellbeing. In order to underpin the overall quality of life in all areas and support wider social and economic objectives, the development and maintenance, to a high standard, of a well-connected and multi-functional green infrastructure network, is essential. Part of the challenge will be to identify and secure funding to ensure that the investment and improvements made to the city's green infrastructure have a lasting impact and generate optimum value for public and private money. High quality green infrastructure is crucial in encouraging people to continue to live in the city and to attract others to want to move to, visit and invest in the city.

Green infrastructure will also have an important role to play in helping the city adapt to climate change. This will include moderating urban temperatures, storing excess rainfall, increasing surface porosity to ease drainage, providing shade via tree canopies, and providing green oases in urban areas. Essentially, the city's green infrastructure is a visual expression of how we see ourselves as a society and the environment in which we choose to live.



## Policy GE1 Green Infrastructure

1. The Council will protect green infrastructure based on an analysis of existing assets, informed by the Green Infrastructure Study and Green Space Strategy by incorporating the Council's Green Space Standards, and characterisation assessments.
2. New development proposals should make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation.
3. Coventry's existing and planned network of green infrastructure should be used as a way of adapting to climate change through the management and enhancement of existing habitats. This must be demonstrated through the creation of new habitats wherever possible to assist with species movement, to provide a source of locally grown food through allotments and community gardens, to provide sustainable and active travel routes for people, to provide shade and counteract the urban heat island effect, and to assist in improving public health and wellbeing.
4. New development will be expected to maintain the quantity, quality and functionality of existing green infrastructure. Where quantity is not retained, enhancement to quality is expected. Where the opportunity arises, and in line with the city's most up-to-date Green Space Strategy, the Council will also expect new developments to enhance green infrastructure, and create and improve linkages between individual areas. Any development which is likely to adversely affect the integrity of a green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place.
5. A key element of Coventry's approach to green infrastructure will be the continued development of a network of green spaces, water bodies, paths and cycle ways, with priority given to those parts of the city where there is an identified deficiency of green space. Where a development proposal lies adjacent to a river corridor or tributary, a natural sinuous river channel should be retained or, where possible, re-instated. Culverts should be removed unless it can be demonstrated that it is impractical to do so.
6. Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes or other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by:
  - a. Not permitting development that compromises its integrity and that of the overall green infrastructure framework (including the Coventry/Oxford Canal);
  - b. Using developer contributions to facilitate improvements to its quality, connectivity, multi-functionality and robustness;
  - c. Investing in enhancement and restoration where opportunities exist, and the creation of new resources where possible, such as linking green infrastructure to other forms of infrastructure;
  - d. Improving its functionality, quality, connectivity and accessibility;
  - e. Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity;
  - f. Integrating proposals to improve green infrastructure in the delivery of new developments, particularly through area based regeneration initiatives and major proposals and schemes;
  - g. Flood risk management and improving surface water quality.

The long term vision for green infrastructure in Coventry, outlined in the Green Infrastructure Study, is the provision of a city wide network of high quality, well managed and well connected, multi-functional green space, delivering a wide range of benefits to those living, working and visiting the city, and improving the attractiveness of the city as a whole. The suite of green infrastructure assets can be classified under 3 overarching categories of 'formal', 'informal' and 'functional', as follows:

- **Formal:**

- urban parks
- country and regional parks
- formal and private gardens
- institutional grounds  
(for example schools and hospitals)
- outdoor sports facilities
- civic squares and spaces

- **Informal:**

- recreation spaces and playing fields
- play areas
- village greens
- urban commons
- incidental green space
- natural and semi-natural spaces including woodlands, hedgerows, scrub, meadows, wetlands, open and running water, and bare rock habitats
- rivers and canals including their banks
- road and rail corridors and verges
- cycling routes and rights of way
- national and local nature reserves and locally designated sites for nature conservation
- historic landscapes, archaeological and historic sites

- **Functional:**

- allotments
- community gardens
- city farms
- orchards
- roof gardens
- urban edge farmland
- cemeteries and churchyards
- sustainable urban drainage schemes and flood storage areas.

Green infrastructure is considered equal to all other forms of infrastructure and will be viewed as a critical element in the determination of planning applications. All outline and detailed planning applications will need to demonstrate consideration of the site's potential impact on the existing green infrastructure network. The design of developments will need to respect their relationship to the city's

green infrastructure network and opportunities sought wherever possible to improve the network, including the installation of features such as urban trees and green roofs. Where open space is created within developments, it will be of a high and lasting design quality which seeks to minimise on-going maintenance pressures. Its efficiency will be maximised through the designing in of multiple functions, including biodiversity, sustainable drainage, natural shading, informal recreation, adventure play, art appreciation and organised sports. The layout of this open space will also support the existing green infrastructure network.

The green infrastructure network will be accessible, useable and useful for both people and wildlife. It will be a key contributor to Coventry's aim to be a more sustainable city and its actions against climate change, and help the city to project a positive and attractive image. During this plan period, the Council, in partnership with the local community, will help to plan, deliver and manage Green Infrastructure to maintain and develop a high quality environment, which makes Coventry attractive, vibrant, prosperous and sustainable. Priorities for investment will be in those areas where net gains in the range of functions can be most effective and in particular, where it improves public accessibility and local deficiencies in multi-functional green space provision, quality, biodiversity and connectivity.

Green infrastructure should be considered in the same manner as any other form of infrastructure servicing new development, and should be an essential component of all fully serviced development plot. New green infrastructure associated with development should connect into site level networks which should in turn connect into the city-wide network. All developments should include, wherever possible, green infrastructure elements, including SuDs, urban trees and green roofs, which deliver multiple sustainable benefits to the urban environment through their natural processes.

## Formal Green Space

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### Urban Parks

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The city has identified a hierarchy of provision for its parks and open spaces. Within that hierarchy the sites defined as parks and open space (Premier Park, Area Park, Neighbourhood Park, Country Park, Principal Open Space, Incidental Open Space and Ornamental Areas) are important elements of the city's green space and are shown on the Policies Map. They provide a sense of place for the local community and provide landscape quality to particular densely populated urban areas of the city.

### Outdoor Sports Facilities

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Outdoor sports provision considers grass pitches across the city, both public and private on dedicated sites or in other open spaces such as parks. It also considers other sports provision such as bowls, tennis and athletics that may also be on specific sites or in other spaces. There is a good distribution of sports pitches across the city and the level of community use needs to be monitored to enable on-going supply and demand calculations to be established in accordance with the Council's Playing Pitch Strategy. The way in which sports pitches are provided and maintained is changing, especially those in public ownership. In this context, opportunities to create 'hub sites' will be supported where a grouping of pitches can be provided in a single location to meet the needs of a range of sports and teams.

## Informal Green Space

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### Natural and Semi Natural Spaces

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It is widely understood that sites of natural or semi-natural green space that are accessible, enhance the quality of life for people. The wildlife and biodiversity benefits that these sites also contribute are often neglected. Biodiversity is important to the quality of the air that people breathe, to the richness in variety

of species in an area and as an indicator of the health and quality of a local environment. These areas not only have benefits in terms of biodiversity, they can also be valuable to local economies and as a tourism asset. It is important to recognise that the public rights of way network may serve to provide people in the area with access to the wider countryside.

## Play Areas

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For the purposes of developing the Green Space Strategy, provision for children and young people has concentrated on the fixed play provision within the city and consists of equipped play areas and other specialist provision, such as multi-use games areas and wheeled play provision or skate parks. However children play in a wide variety of other places as well.

Coventry also has a Play Pitch Strategy to improve play opportunities for children and young people entitled 'Something to do' developed by a range of Council services in partnership with the voluntary sector. The Play Pitch Strategy will be used to help the Council and its partners:

- Develop better and more local and inclusive play spaces and opportunities;
- Create a more child-friendly public realm;
- Ensure that neighbourhood play areas that are safely accessible by young children are provided in all new residential developments;
- Improve understanding of the importance of children's play across the range of policy areas that have an impact on children's lives;
- Embed play within key strategic plans and initiatives.

This Strategy will be regularly monitored to reflect any changes in policy, funding, legislation, other strategies or plans. Local consultation with communities will also be fed back into the Strategy. It will also be used to help inform planning decisions about play, including developer contributions, with particular reference to natural and informal play opportunities for children and young people. As such it supports the development of the IDP. The Council will seek to protect open space of value to the community and provide accessibility to a sufficient quantity and quality, including the provision of parks and open spaces, natural green space, provision for children and young people, outdoor sports and allotments. In order to achieve this, the Council will seek to enhance and improve areas of existing open space, and to provide new types of open space where there is a deficiency in quantity, quality or accessibility. In seeking to improve play opportunities for children and young people, the strategy will be supported, with particular reference to promoting natural and informal play opportunities.

## Functional Green Space

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### Allotments and Community Gardens

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Allotments provide a key type of provision within the overall portfolio of open space and recreation facilities, whilst also making a valuable contribution to improving the health and wellbeing of local people. As such, the value of allotments is significant, providing facilities for physical activity in addition to the promotion of healthy eating and educational value. The provision of allotments is a statutory function for local authorities under a number of acts including the 1950 Allotment Act. There is some indication that waiting lists are increasing and that allotments are becoming more popular. Over recent years there has been a growing interest in the development and establishment of community gardens which are similar to the more traditional allotment provision but offer an alternative that is less formal and potentially easier to integrate within urban environments.

## Churchyards and Cemeteries

Cemeteries and closed churchyards can provide a valuable contribution to the portfolio of open space provision within an area. For many, they can provide a place for quiet contemplation in addition to their primary purpose as a final resting place. They often have wildlife conservation and biodiversity value also.

### Policy GE2: Green Space

- 1.** Development involving the loss of green space that is of value for amenity, recreational, outdoor sports and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation, or it can be demonstrated that:
  - a.** An assessment showing there is no longer a demand, or prospect of demand, for the recreational use of the site or any other green space use; or
  - b.** A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards; or
  - c.** The loss resulting from any proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location of the city.
- 2.** To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new replacement sports pitches:
  - a.** Land at Charter Avenue (former Alderman Harris School site).
  - b.** Land east of Coundon Wedge Road.

In order to address health inequalities and to promote healthier lifestyles, people need to have good access to a range of parks, open spaces, indoor and outdoor sports and recreational facilities. These spaces also add to the quality of the environment. This includes formal sports provision such as playing fields and play areas, as well as more informal areas of open space suitable for general relaxation, children's play, walking and cycling.

An extensive audit and needs assessment of recreational open spaces and outdoor sports facilities in the city was undertaken in consultation with the local community during 2007 (PPG17 Audit), which will be monitored and kept up-to-date during the plan period. This audit has informed the review and replacement of the Coventry Green Space Strategy and examines the quantity, quality and accessibility of green space provision within the city.

The Council has adopted a Green Space Strategy, which sets out minimum local standards for green space provision. It sets out the provision standards for the various categories of open space looking at quantity, quality and accessibility. There is also a set of quality standards for each of the provision standard categories. The same green space can sometimes contribute to more than one category in the standards.

The standards reflect the information received from the various need surveys and audit information and any new development will be required to meet these minimum standards.

The sites allocated for replacement sports pitch provision are situated within a new area of Local Green Space and the Green Belt respectively. The NPPF is clear that the provision of sports pitches will be appropriate within both designated areas so long as it does not impact on the purposes of the designation. In both cases the creation of new sports pitches is not expected to impact upon the purposes of Green Belt or Local Green Space and will support the sustainable provision of high quality sports and recreation facilities within the respective areas.

## Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation

1. Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity. Development proposals will be expected to ensure that they:
  - a. lead to a net gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and development impacts;
  - b. protect or enhance biodiversity assets and secure their long term management and maintenance;
  - c. avoid negative impacts on existing biodiversity;
  - d. preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans.
2. Where this is not possible, adequate mitigation measures must be identified. If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be considered, but only in exceptional circumstances.
3. Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, as part of the strategic framework for green infrastructure. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan (LBAP), will be protected and conserved through a buffer or movement to alternative habitat. Identified important landscape features, including Historic Environment assets, trees protected by preservation orders, individual and groups of ancient trees, ancient and newly-planted woodlands, ancient hedgerows and heritage assets of value to the locality, will be protected against loss or damage. In the case of archaeological remains, all practical measures must be taken for their assessment and recording in accordance with Policy HE2.

Planning legislation places a biodiversity duty of care on all local and public authorities, emphasising that development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their area. These characteristics include the relevant biodiversity and geological resources of the area. In reviewing environmental characteristics, the Council will continue to assess the potential to sustain and enhance these resources.

Connectivity between sites and buildings, and resilient and robust ecosystems, which are adaptable to change, are essential to ensure retention of existing levels of biodiversity and to enable these to be enhanced wherever possible. As part of new development this could be achieved through well designed gardens, green roofs or landscape features. Resilient and functioning ecosystems support a range of human population needs, including flood management, control of atmospheric pollution, and access to green space.

In order to restore good levels of biodiversity across the Warwickshire, Coventry and Solihull sub-region, it is important to have urban areas that are permeable for wildlife, with havens for wildlife through the city and connected corridors linking sites. Green infrastructure planning and implementation can contribute strongly to fulfilling this. Biodiversity will be promoted as a core component of sustainable development and landscapes for living, underpinning social, health, environmental and economic benefits, together with community well-being and local quality of life.

All development proposals will be expected to avoid negative impacts on existing biodiversity. Where this is not possible, mitigation measures should be identified, if these are not possible on site, then these should be offset elsewhere as a compensatory measure, but only in exceptional circumstances. Such circumstances may include the comprehensive delivery of a planned strategic allocation in accordance with a Council approved Masterplan. In all such cases though, compensatory provisions should be made as close to the original site as possible. In this instance development proposals should be guided by the Council's approach to biodiversity offsetting as set out in the Green Infrastructure Strategy, or any subsequent update to this document and national policy. In all instances, the long term management and maintenance of ecological features must be demonstrated. In order to assist in ecological assessments the Warwickshire Biological Records Centre should be consulted.

## Policy GE4: Tree Protection

1. Development proposals will be positively considered provided:
  - a. there is no unacceptable loss of, or damage to, existing trees or woodlands during or as a result of development, any loss should be supported by a tree survey;
  - b. trees not to be retained as a result of the development are replaced with new trees as part of a well-designed landscape scheme; and
  - c. existing trees worthy of retention are sympathetically incorporated into the overall design of the scheme including all necessary measures taken to ensure their continued protection and survival during construction.
2. Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.

Trees make a valuable contribution to the city's green landscape. New developments should seek to retain existing trees and other landscape features, incorporating them into a high quality design and landscape proposals where possible. Should loss be unavoidable, compensatory provision of new trees should be proposed as part of a well-designed landscape scheme or within other areas of green space within the local community. This will ideally be within 400m of the site to reflect the distance recommended within the Green Space Strategy. All replacement trees should also be of an appropriate type and status to reflect those which have been lost.

Trees that are already subject to protection either as part of an Ancient Woodland (as shown in Appendix 3) or through a Tree Preservation Order should be retained for the value they add to the visual amenity of the area, as such development proposals should retain protected trees.

In exceptional circumstances where the benefits of development are considered to outweigh the benefit of preserving protected trees, development will be permitted subject to adequate compensatory provision being made. This could take the form of replacement trees or a financial contribution equivalent to the value of the removed tree(s). This will be calculated using an appropriate assessment calculation agreed with the Council such as CAVAT. Further details will be provided in a Tree Protection Supplementary Planning Document.



## 8. Design

### Relevant Evidence Base

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- Coventry Urban Design Guidance (2004)
- Coventry Green Space Strategy (2008)
- Coventry Green Infrastructure Study (2008)
- Coventry Historic Environment Record (HER)
- Coventry Spires View Management Framework – Technical Guidance (2015)

### Introduction

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**The city's built and natural environments reflect the public realm or public face of Coventry. They are integral in creating a positive image and help create a sense of place, shaping cultural identities and helping to instil civic pride. They play an important part in improving the health and wellbeing of the population and can help mitigate the impacts of climate change. Furthermore they can play an important role in helping to attract investment, visitors and encourage tourism.**

The public realm is essentially the network of routes and spaces that connect the city together. They are like the arteries of the city and the better they operate the better the city functions. These routes and spaces are usually but not always fronted or bounded by development and they contribute to the city in different ways. Whatever the type of route they all need to be designed to ensure they are attractive and pleasant to use. Through-city and city-wide routes are very important at conveying the image of the city to those merely passing through and creating good first impressions of the city to vehicle-borne visitors alike. Whilst local and neighbourhood routes are fundamental in ensuring that the city is a pleasant and attractive place to live and work.

In all cases well designed and maintained streets and public spaces can help encourage walking and cycling, and can reduce anti-social behaviour and crime including the perception and fear of crime. Furthermore creating routes and spaces that are green, through the use of trees, living walls, green roofs and, other types of green infrastructure, will not only enhance the quality and attractiveness of the city but will also contribute to ecological diversity.

### High Quality Design

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The Council wants to significantly raise the standard of design in the built and green environments as good design assists in the creation of sustainable and inclusive communities and can improve the quality of people's lives. Furthermore good design can help to reduce some of the environmental inequalities between the more deprived neighbourhoods and the rest of the city.

This Local Plan will ensure that development follows an effective design process, which assesses the physical, social and economic context, evaluates options and involves affected groups of people.

## Policy DE1 Ensuring High Quality Design

1. All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area.
2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.
3. All development will be expected to meet the following key principles:
  - a. respond to the physical context of the site;
  - b. consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design;
  - c. where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;
  - d. preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;
  - e. preserve or enhance the character and setting of major road, rail and canal corridors;
  - f. clearly define the boundaries between public and private spaces and enclosure of space;
  - g. provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;
  - h. make places that inter-connect and are easy to move through;
  - i. ensure places are easily understood by users, with clear routes and distinct physical features;
  - j. seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;
  - k. be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;
  - l. promote diversity through mixes of uses within a site or building, which work together to create vital and viable places;
  - m. be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;
  - n. consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate);
  - o. support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;
  - p. minimise adverse impact on important natural resources;
  - q. conserve, restore or enhance biodiversity; and
  - r. respect and enhance landscape quality including trees, hedges and other landscape features of value.

Opportunities to reflect existing materials and characteristics as part of new developments should be the starting point of any design proposals. Where there is no established character or the character is poor quality there will be a clear and justifiable need to bring about improvements and enhancement to the existing built and natural environment. As such, proposals which demonstrate high quality design; reflect the requirements of policy DE1 and would reflect a significant enhancement of the built environment may be considered acceptable even where they divert from current characteristics.

Wherever possible, development proposals should look to incorporate existing landscape features – landform, trees, hedges, water bodies etc. These should be used to inform and guide how a development is designed and they should be incorporated in a way that ensures they will contribute positively to the development and surrounding area.

Like the routes and spaces, the buildings that front them must positively contribute to the built environment. They need to be designed to enhance their immediate location and the city as a whole. They should be energy efficient and incorporate sustainable technologies to help combat climate change. They should also be designed to be safe and easy to use by all members of the community, including people with restricted mobility.

Design proposals relating to landscaping, public realm and green spaces should also be prepared in accordance with the Green Environment and Environmental Management policies of this plan. Any sites brought forward within or immediately adjacent to a Conservation Area or which has an impact on the setting of a listed building should also be considered in accordance with the heritage policies of this plan.

To support the importance of promoting high quality design across Coventry and within specific development proposals, Supplementary Planning Documents will be prepared. These will include specific guidance relating to:

- The city centre;
- The 2 Sustainable Urban Extensions at Keresley and Eastern Green; and
- City wide Design Guidance.

## 9. Heritage

### Relevant Evidence base

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- The Coventry Historic Environment Record (HER)
- The National Heritage List for England
- The Coventry Local List of Buildings of Historic and Architectural Interest
- Coventry Heritage at Risk Register
- The Gould Report on the 20th Century City Centre (2009)
- The Coventry Historic Landscape Characterisation (2013)
- Spon End and Nauls Mill Area of Local Distinctiveness (2003)
- Conservation Area Appraisals and Management Plans
- The Arden Design Guidance (1995)
- Design Guidance on Shop fronts for Conservation Areas and Historic Buildings (2014)

## Introduction

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**Coventry has a rich and diverse historic environment which is evident in the survival of individual historic assets and in the local character and distinctiveness of the broader landscape. Prehistoric flint tools which have been collected from fields around the city demonstrate that there has been human activity in the Coventry area since at least the Mesolithic period, some 10,000 years ago.**

The landscapes and buildings that can be seen today predominantly date from the medieval period onwards when Coventry grew from a small Saxon settlement to become one of the principal cities of medieval England. The wealth of the medieval city peaked in the 15th century and was followed by a slow economic decline that saw Coventry stagnate until a second period of dramatic expansion occurred in the late 19th century with the emergence of industries such as ribbon weaving and watch making. Twentieth century Coventry became a major centre for manufacturing and the city grew rapidly with factories and housing expanding over the previously rural landscape absorbing many of the surrounding villages and farms. The concentration of industry in Coventry resulted in it suffering from extensive bombing during World War II, causing significant damage to the fabric of the city. However the wartime destruction was followed by an era of extensive reconstruction with innovative architecture and design in the 1950s and 60s.

## Conservation Areas

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Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on local planning authorities to designate as Conservation Areas any 'areas of special architectural or historic interest the character and appearance of which it is desirable to conserve or enhance'. The Act also requires local planning authorities to review their Conservation Areas from time to time and designate extra areas where appropriate.

The Council will investigate the potential for designating new Conservation Areas in the Victorian and Edwardian suburb of Earlsdon and rural Arden settlement of Brownhill Green.

- Earlsdon was originally laid out as a 'garden village' in 1852 by the Coventry Freehold Land Society with 251 plots arranged around eight streets. Development progressed slowly and it was many years before all of the plots were filled and many of the area's buildings date from the late Victorian / Edwardian period. The areas are already known to be green and leafy with a strong Edwardian character with several interesting buildings, some of which have already been locally listed for their architectural and historic interest.
- The settlement at Brownhill Green dates back to the medieval period and is referred to in 1411 as Le Brounsehul Felde. The settlement would have been clustered around a rectangular village green, a piece of common land that was crossed by Wall Hill Road and Hawkes Mill Lane. The pub and the properties along Hawks Mill Lane are 19th century encroachments on to the green, while the earlier houses are set well back from the roads indicating where the edge of the green once was. The area contains numerous listed and locally listed buildings.

The Council will also review the boundaries of the following existing Conservation Areas.

- Allesley;
- Kenilworth Road;
- Stoke Green;
- Greyfriars Green;
- Ivy Farm Lane
- High Street; and
- Spon End.

Appraisals and management plans will be produced for all of the city's Conservation Areas to guide their preservation and enhancement.

## Policy HE1 Conservation Areas

**1.** The areas listed below have been designated as Conservation Areas under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and are detailed on the Policies Map:

- a.** Allesley
- b.** Chapelfields
- c.** Coventry Canal
- d.** Far Gosford Street
- e.** Greyfriars Green
- f.** Hawkesbury Junction
- g.** High Street
- h.** Hill Top
- i.** Ivy Farm Lane
- j.** Kenilworth Road
- k.** Lady Herbert's Garden and The Burges
- l.** London Road
- m.** Naul's Mill
- n.** Spon End
- o.** Spon Street
- p.** Stoke Green

**2.** The following areas are proposed for designation as Conservation Areas:

- a.** Earlsdon
- b.** Brownshill Green

The exact boundaries will be determined by the production of Conservation Area Appraisals and Management Plans following public consultation.

**3.** Conservation Area Appraisals and Management Plans will be produced for all of the Conservation Areas to guide their preservation and enhancement. All development proposals within Conservation Areas will be determined in accordance with this Plan and the appropriate Appraisal and Management Plan.

## Conservation and Heritage Assets

Coventry has over 400 Listed Buildings ranging from the medieval St Mary's Guild Hall to the 1962 railway station that have been selected by the Government as being of national importance. In addition over 280 buildings have been selected by the Council for Local Listing due to their importance to Coventry. The city also has 16 Conservation Areas (plus a further two proposed through this plan), 20 Scheduled Monuments, 4 Registered Parks and Gardens and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record.

## Policy HE2: Conservation and Heritage Assets

1. In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance. These Heritage Assets include:
  - a. Listed Buildings and Locally Listed buildings;
  - b. Conservation Areas;
  - c. Scheduled Ancient Monuments and Archaeological sites;
  - d. Registered Parks and Gardens; and
  - e. Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's heritage and are positively identified on the Coventry Historic Environment Record.
2. Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance using currently available evidence.
3. Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail.
4. The sympathetic and creative re-use of heritage assets will be encouraged, especially for heritage that is considered to be at risk, so long as it is not damaging to the significance of the heritage asset. The embodied energy present in historic buildings contributes to sustainability.
5. The Council will use its statutory powers to secure the preservation of buildings and other heritage assets that are deemed to be at risk by the national and local heritage at risk registers.
6. Demolition or destruction of heritage assets will be resisted; proposals to demolish a heritage asset will therefore need substantial justification. The greater the damage to the significance of the asset, the greater the justification required and the public benefit needed to outweigh such damage.
7. All proposals should aim to sustain and reinforce the special character and conserve the following distinctive historic elements of Coventry:
  - a. The surviving buildings, defences and street plan of the medieval city centre and its suburbs;
  - b. The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Brownhill Green, Coundon Green, Little Heath (Spring Road), Stivichall Croft and Lower Eastern Green (at Dial House Lane);
  - c. The wider Arden rural environment on the fringe of the city comprising field-systems, ancient woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings;
  - d. Buildings associated with the city's industrial heritage; ribbon weaving, watch making, cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways;
  - e. The Victorian and Edwardian suburbs such as Earlsdon and Stoke;
  - f. Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks;

- g.** The significant elements of Coventry's ground-breaking post-war reconstruction including its plan, built form, public art works and public spaces; and
  - h.** Archaeological remains of all periods from the earliest Prehistoric human habitation to the modern industrial period.
- 8.** Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.

Where it is considered necessary, the Council will propose buildings for Listing by national government and will also continue to enhance and maintain an up-to-date Coventry Local List of buildings of historic and architectural interest.

Where heritage assets are present on sites allocated for housing in Policy H2, the Council will seek to secure their retention and conservation through legal agreements.

In addition to the national Historic England Heritage at Risk Register the Council will maintain the Coventry Heritage at Risk Register and work with property owners and developers to reduce the number of heritage assets in Coventry that are deemed to be at risk. The Council will use its statutory powers where necessary to secure the preservation of listed buildings with Urgent Works and Repairs Notices. To reflect their historic importance, scale and strategic proximity to the city centre, the sites of Charterhouse and the London Road cemetery are to be designated as a Heritage Park. This is considered further in Policy HE3.

The Council will continue to maintain an up-to-date and accessible Historic Environment Record as the principal evidence base on the city's Historic Environment. Historic Landscape Characterisation and the Arden Design Guidance will be used to inform decisions on historic character and local distinctiveness.

## Heritage Park - Charterhouse

Through the Local Plan and partnership working with Historic England and the Historic Coventry Charitable Trust, the Council are promoting through this Local Plan the creation of a City Heritage Park in the Sherbourne Valley and the grounds of the Charterhouse and London Road Cemetery. The designation reflects the historic significance of the two sites as well as their scale and strategic proximity to the city centre. There is also wider connectivity opportunities associated with the River Sherbourne. Proposals to establish the park will be supported along with measures to improve linkages to the area, and improve accessibility between the city centre and the Charterhouse grounds. These should include a riverside walkway along the exposed section of the River Sherbourne, connecting Far Gosford Street with Charterhouse along the west side of the river crossing Gulson Road and Humber Avenue. A footpath and cycle route along the former Coventry loop line railway and a new pedestrian crossing on the London Road. These enhancements, in connectivity and green infrastructure, could facilitate comprehensive regeneration opportunities of brownfield land along the River Sherbourne, most notably between Gulson Road and Gosford Street and in Harper Road that will complement this part of the city. The Proposed City Heritage Park and its key routes and linkages are identified on the inset map at Appendix 4. The wider area will be supported by a Masterplan.

In addition, opportunities should be taken to improve the setting of the Charterhouse, the naturalisation of the river valley and the views through to the viaduct. Prime examples include land around Blue Coat School, where:

- the existing car park is to be removed from the area of the Charterhouse Scheduled Ancient Monument; and
- The all-weather sports and playground facilities are to be relocated away from the riverside in an appropriate and sustainable way.



These 2 areas should then be proactively re-naturalised or appropriately landscaped, adding to the Heritage Park where appropriate and supporting an extension to the current Local Green Space designation that is proposed for the land west of the river. The extension of the Local Green Space designation should be supported by new defensible boundary lines created as part of the Master planning process and brought forward in partnership with the local community, the school and the Charterhouse Trust.

To ensure Blue Coat School continue to offer a high quality education offer to the city however, these facilities will then be relocated onto former allotment land to the east of the river, which will be removed from the Green Belt providing a firm boundary for future school expansion. The proposed Green Belt amendments around Blue Coat School and Charterhouse are shown on the Policies Map.

## Policy HE3 Heritage Park – Charterhouse

1. Proposals for a City Heritage Park in the grounds of the Charterhouse and London Road cemetery will be supported along with measures to improve linkages to the area along the River Sherbourne (between Charterhouse and Far Gosford Street), the former Coventry loop railway line and across the London Road. Proposals that are detrimental to the establishment of the heritage park and the improvement of linkages will be resisted.
2. Land at Blue Coat School is to be removed from the Green Belt in accordance with policy GB1 to support the expansion of school facilities on condition that the existing school car park is removed from the area of the Charterhouse Scheduled Ancient Monument. In addition, the expansion of the school should also support the appropriate relocation of the all-weather sports facilities and playground areas to secure the enhancement of the riverside area. This should facilitate the re-naturalisation of the area in an appropriate way in order to enhance the setting of the Charterhouse, its precinct and the Heritage Park as a whole.
3. The creation of the Heritage Park and expansion of Blue Coat School should be guided by a comprehensive Master plan, which reflects the policies of this Plan (including Appendix 4).

## 10. Accessibility

### Relevant Evidence Base

- Census travel to work data ONS (2011)
- West Midlands Local Transport Plan 3 (LTP3) (2011-2026)
- West Midlands Strategic Transport Plan (2015)
- West Midlands Household Survey
- West Midlands 1500 point Survey (2015)
- Coventry and Warwickshire Strategic Economic Plan (SEP) (2014)
- Coventry Area Strategic Model (CASM) – WSP (2015 and 2016)
- Coventry and Warwickshire's Commuting Movements (2015)
- Traffic Master Data (2015)
- Coventry Rail Investment Strategy (2013)
- Coventry Vehicular Cordon Survey (2013)

- Coventry Pedestrian and Cycle Cordon Survey (2015)
- The Coventry Joint Health & Wellbeing Strategy (2012)
- Report to Scrutiny Co-ordination Committee, Air Quality (2014)
- Coventry Air Quality Action Plan and Progress Report (2012-14)
- Report to Cabinet – Age Friendly City Programme (2014)

## Introduction

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**The local transport system will play a critically important role in supporting major housing and jobs growth in Coventry, and the Council's ambition to become a top ten city.**

In addition to enabling everyday activities such as accessing work, education, shops and leisure facilities, transport can also have a significant influence on peoples' health and wellbeing and overall quality of life. Transport is also an enabler of economic activity, providing connections between people and jobs, access to markets and business supply chains.

Individual transport needs can vary significantly. It is therefore important to ensure that everyone who lives in, works in or visits the city is able to access a choice of accessible and high quality transport modes and make well informed and appropriate decisions about how and when they travel.

Coventry's existing transport network generally works effectively, however there are a number of important wider challenges to address:

- The dominance of the car in the context of a compact growing city with a high proportion of short local car trips which discourages physical activity, thus promoting less healthy lifestyles.
- Relatively low levels of cycling, and to a lesser extent walking and public transport usage for local trips, especially for trips to school and work.
- Low levels of accessibility and a high reliance on access by car to some edge of city employment and retail sites.
- Road congestion on some major road corridors, primarily during peak periods, which can negatively affect economic growth and air quality.
- The impact of the car in the street environment such as obstructive on-street parking, road safety and general street clutter.
- Working towards achieving current road casualty reduction targets and making our roads safer for all.
- The need for improved strategic connectivity to surrounding areas which are economically linked to Coventry.

## Public Health and Air Quality

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Transport, public health and land use planning are intrinsically linked. For example physical inactivity, which is typically exacerbated by excessive reliance on the private car, is a major contributory factor to the cause of obesity which is linked to the onset of type 2 diabetes, both of which are rising rapidly in the resident population. For example, the Coventry Joint Health and Wellbeing Strategy shows that 20% of Coventry's year 6 children are obese with a further 14% overweight. A major contributory factor is an increase in sedentary lifestyles and poor diet. There is evidence of this locally which shows that a large proportion of very short local trips are made by car, further amplifying levels of physical inactivity. The health sector is keen to promote a more proactive approach to healthcare by encouraging the take-up of active travel modes. Therefore the promotion and uptake of walking and cycling as an everyday travel

mode presents an ideal solution to address these issues. Coventry is a designated Marmot City, so is seeking ways to address health inequalities across the city. The Cycle Coventry Programme also helps support cycle infrastructure improvements and supporting Smarter Choice modes together with the TfWM's Strategic Transport Plan where it includes developing a metropolitan strategic cycle network to ensure seamless travel.

A citywide Air Quality Management Area (AQMA) was declared in Coventry in 2009<sup>6</sup> due to significantly high levels of air quality emissions. Research demonstrates that emissions from road transport are the principal source of elevated concentrations of Nitrogen Dioxide (NO<sub>2</sub>) which causes poor air quality. The main transport corridors to the North and North East of Coventry (linked to the M6) are identified as being most likely to exceed the NO<sub>2</sub> standard<sup>7</sup>.

The development and expansion of the city provides an opportunity to address these issues through investment in the existing transport network, and by ensuring that new developments cater for the accessibility needs of a diverse, forward looking low carbon city. This includes opportunities for the promotion of intelligent mobility and more active and environmentally sustainable modes of travel such as walking and cycling, public transport and ultra-low emission vehicles such as electric cars.

There are already a number of positive initiatives taking place including a successful programme of investment in transport networks across the city. This includes a successful programme of public realm enhancements in the city centre, targeted investment to address congestion along a series of busy road corridors and the delivery of a substantial programme of cycle routes.

## Strategic Connectivity

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The need to enhance accessibility within the city is underpinned by a wider objective to strengthen accessibility across Coventry and Warwickshire and with neighbouring areas in the East and West Midlands. This approach recognises the established economic travel to work area and reinforces opportunities to enhance business connectivity and supply chains.

The Coventry and Warwickshire LEP, through its Strategic Economic Plan (SEP), acknowledges the important role transport plays in supporting economic growth proposals and the strong interactions which exist on the Coventry and Warwickshire north-south corridor, and those with the West Midlands, East Midlands, Northamptonshire and Oxfordshire. These interactions have also been identified by the initial findings of the Midlands Connect programme which is seeking to improve the strategic connectivity to support growth objectives.

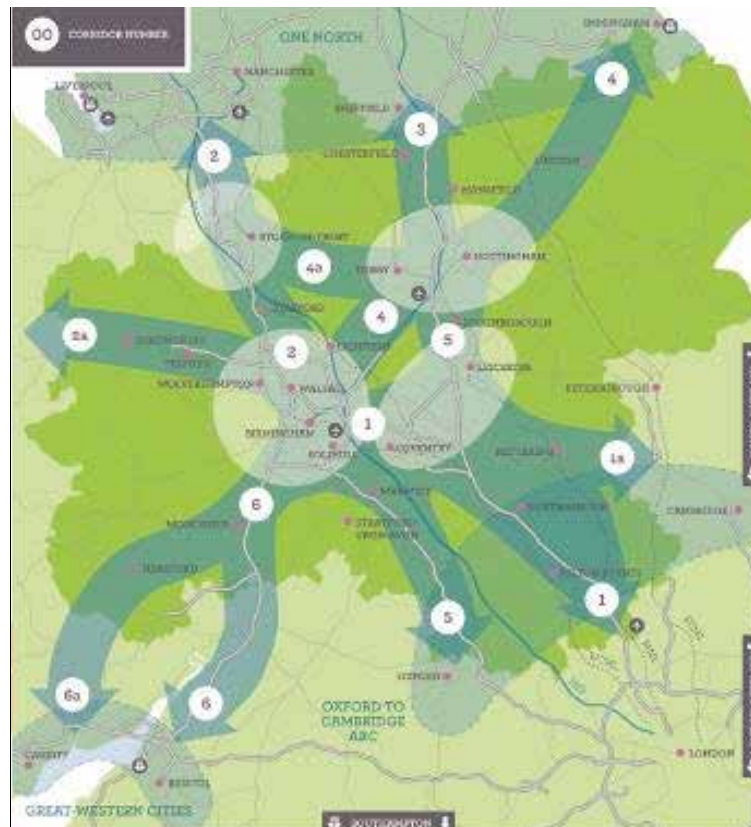
The approved Strategic Transport Plan for the West Midlands Metropolitan Area "Movement for Growth" sets out the overarching transport strategy for the West Midlands Metropolitan area. The plan's approach of a metropolitan tier with a metropolitan rail and rapid transit network, key route network and metropolitan strategic cycle network will help deliver a transport system which boosts our economy and improves the environment.

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<sup>6</sup> [http://www.coventry.gov.uk/downloads/file/13783/air\\_quality\\_management\\_area\\_aqma\\_order](http://www.coventry.gov.uk/downloads/file/13783/air_quality_management_area_aqma_order)

<sup>7</sup> [http://www.coventry.gov.uk/downloads/download/618/air\\_quality\\_in\\_coventry](http://www.coventry.gov.uk/downloads/download/618/air_quality_in_coventry)

**Figure 10.1** - Midlands Connect – Strategic Growth Corridors and Hubs



## An Accessible Transport Network

In order to create a prosperous and attractive city, local people must have good access to the jobs and services they need. This can only be achieved if the transport network offers a wide choice of convenient, affordable and reliable transport modes which meet the needs of the varying types of trips which people need to make.

The principles adopted in this development plan promote the utilisation of accessible brownfield sites with additional housing being met through the development of Sustainable Urban Extensions (See Policies H1-H3).

The use of brownfield sites will:

- Make sustainable travel options, such as walking and cycling more attractive options for local trips;
- Help to focus development towards accessible locations making it easier for local people to access employment, education and skills, shops and leisure facilities and reduce the distance people need to travel;
- Support higher density development proposals which will help support the viability of public transport services

It is essential that major housing and employment sites are appropriately linked to the local and strategic road network. The provision of high quality transport infrastructure associated with the development of Sustainable Urban Extensions (SUE's) will be crucial to their success as an environmentally and economically sustainable approach to meeting housing need. SUE's and other major development sites will need to be seamlessly integrated into wider transport networks to encourage the uptake of walking, cycling and public transport.

## Transport Infrastructure Hierarchy

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A modal hierarchy has been developed to guide the types of infrastructure required to fulfil the needs of a growing and manageable sustainable transport network.

- **Local trips** – Shorter trips within and between local neighbourhoods,
- **City trips** – citywide and some cross boundary
- **Strategic trips** – Cross-boundary, regional and national

### Local Trips

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For shorter, local trips to amenities such as to schools and local shops, walking, cycling and public transport should be developed to the point of being the most attractive modes of travel. These modes are more feasible for shorter journeys as well as being more sustainable in terms of reducing local congestion, improving air quality, reducing carbon emissions and have significant added health benefits. At present approximately 60% of all trips within the city are less than 2 miles, a distance which can be easily made by these modes.

Local walking and cycling networks must be of a sufficiently high quality and be safe in order to encourage their use by a wide variety of people with different mobility needs.

### City Trips

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For longer trips within the city, such as access to peripheral employment sites and the city centre, a mix of walking, cycling and public transport should remain as the preferred and most viable options, particularly for trips to school and work. Car use will remain an important part of the transport network, especially for trips involving the movement of goods or for people with more limited mobility.

### Strategic Trips

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For long distance trips to destinations outside of the city, car, rail, rapid transit and air will be the preferred modes of travel. It will be important that everyone in the city has a good level of access to major public transport hubs such as Coventry Station and Pool Meadow Bus Station to boost the attractiveness of public transport services. Opportunities to enhance access to Birmingham Airport, the new high speed rail interchange and proposals for UK Central located in Solihull will also be sought to strengthen national and international connectivity. The road network will continue to cater for a largest proportion of strategic freight, business and leisure trips including the M6, A45/M1 and A46/M40. Opportunities will be sought to meet the rising demand for rail trips in accordance with the Council's Rail Investment Strategy.

## Equality and Choice

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In order to ensure opportunities for travel are equitably available, the needs of everyone in the community should be considered, including those with physical and sensory disabilities, people with special needs, the elderly and young children.

Due to the increasing number of older people in Coventry, the Council is working in partnership with Coventry University and Age UK Coventry to help the city become more age-friendly . Transport has been identified as one of three priority areas to address. To support the achievement of this objective, new development proposals should consider the specific needs of an Age Friendly City.<sup>8</sup> The needs of these groups must be considered and accommodated where possible within new development proposals and associated transport infrastructure.

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<sup>8</sup> <http://democraticservices.coventry.gov.uk/documents/s18644/Age%20Friendly%20City%20Programme.pdf>

## Intelligent Mobility

Coventry is rapidly establishing itself as a test-bed for intelligent mobility. Established links with the car manufacturing sector and Coventry's two universities offers a unique opportunity to develop a high-tech low carbon transport technology industry which could support increased jobs, and provide the opportunity to develop a truly sustainable, integrated and accessible transport network.

### Policy AC1: Accessible Transport Network

1. Development proposals which are expected to generate additional trips on the transport network should:
  - a. Integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes.
  - b. Consider the transport and accessibility needs of everyone living, working or visiting the city. Special attention should be paid to the needs of disabled people, young children, and people with special needs. Special attention should be paid to the needs of an aging population to make Coventry an Age Friendly City.
  - c. Support the delivery of new and improved high quality local transport networks which are closely integrated into the built form. This includes networks which support access to strategic growth corridors. The scale of measures required should be appropriate to the scale and impact of the proposed development.
  - d. Actively support the provision and integration of emerging and future intelligent mobility infrastructure, including electric vehicle charging points, Car Club schemes and bicycle hire.
2. Further guidance will be contained in the Coventry Connected SPD.

## Local Road Network

Coventry is well connected to the national road network having good access to the A46/M40, M69, M6, M45/M1 and M42. Highways England manage the strategic road network which surrounds Coventry and is crucial to its national connectivity needs. This includes the A46 corridor which has been designated as an Expressway in the Highways England Road Investment Strategy. This busy corridor is already benefitting from major investment at Tollbar Island to introduce a grade separated underpass. Further improvements are planned at Brandon Road and Walsgrave near the B4082 to introduce grade separation to improve traffic flow. Further enhancements are likely to be necessary within the plan period, such as the A46/Stoneleigh Road junction located in Warwickshire, which supports access to several major employment sites within Coventry including the University of Warwick and Westwood Business Park. Future capacity enhancements on the strategic highway network which support Coventry's economic growth proposals will be supported.

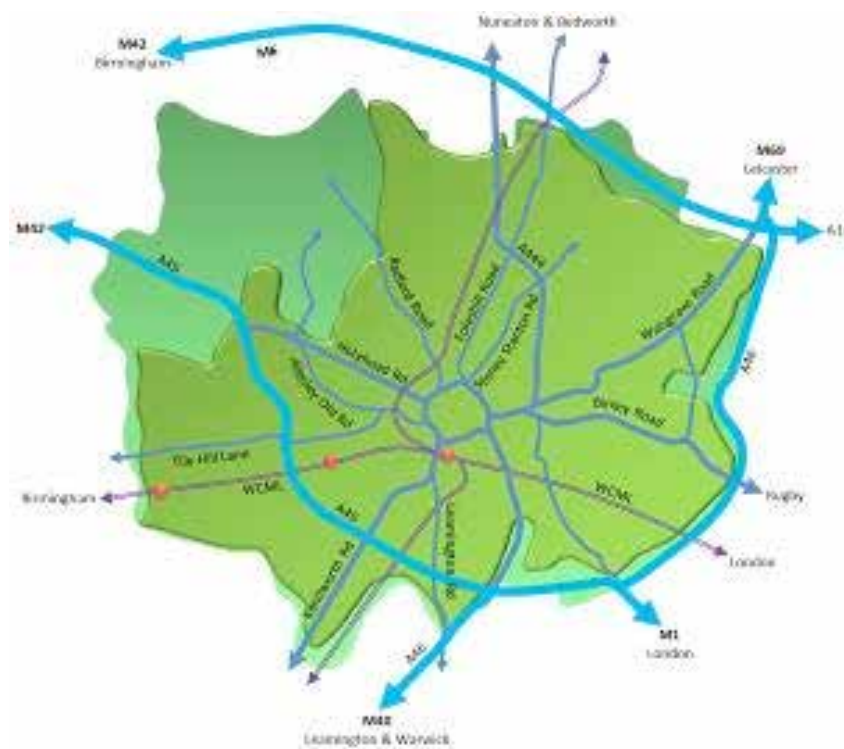
Coventry's well maintained and managed local highway network is considered to be an asset for the city which should be protected. The historic evolution of the city has left a legacy of a concentric web of radial roads enabling direct linkages between the strategic road network and the Coventry ring road. Recent improvements to the road network as part of a major Pinch Point programme has helped to address local congestion hotspots and improve traffic flows, most notably on the A45 and A4600 corridors.

The emerging Key Route Network as highlighted in the West Midlands Strategic Transport Plan will be made up of main metropolitan roads - operating at agreed performance standards. This network will serve the main strategic demand flows of people and freight across the metropolitan area, and provide



connections to the national strategic road network. It will also serve large local flows which use main roads and provide good access for businesses reliant on road based transport and will use highway capacity effectively to cater for movement by rapid transit and core bus routes, the Metropolitan Cycle Network, Heavy/Light Goods vehicles and private cars to support growth on key corridors.

**Figure 10.2** – Highway Connectivity



A major programme of public realm works in the city centre has helped to achieve a step change in the quality of the city centre environment and pedestrian connectivity. On-going works will be promoted in the CCAAP and will seek to enhance the quality of the adjacent public realm, increase the efficiency of traffic flows and improve the permeability of routes which cross the ring road for pedestrians and cyclists. Changes to the ring road may also support opportunities to facilitate the creation of new development sites. Where appropriate, new developments should seek to support and accommodate these proposals.

## Impact of Growth on the Road Network

A comprehensive and independently developed strategic transport model has been carried out by WSP Planning Consultants to assess the impact of planned development proposals on the highway network over the plan period. The appraisal is based on the outputs of the highway element of the Coventry Area Strategic Model (CASM). The model has assessed the impact of the expected additional trip generation from planned residential and commercial development on the local highway network.

The model was used to firstly assess the proposed growth on a 2013 road network plus ‘committed’ schemes (i.e. those which are either completed, under construction or have committed funding). This was referred to as a ‘Do Minimum Scenario’. Following this, a selection of ‘Do Something’ scenarios were modelled to understand the impact of various additional highway capacity improvement schemes on the network which are considered necessary to mitigate the impact of new development up to 2031. The model was also run to consider the total impacts of the growth planned within this Local Plan (by location) having specific regard to the impacts of the proposed SUE’s. Finally, the model has also been used to test the impact of potential growth in other local authority areas adjacent to the city, primarily in Warwickshire and Solihull and the impact this could have on the city’s highways.



The schemes of greatest significance included:

- **Keresley:** Proposal for a new distributor link road connecting Long Lane and Winding House Lane, delivered as part of a wider strategic highway upgrade between the M6 Junction 3 and the A45
- **Eastern Green:** Proposed new grade separated junction from the A45 to provide primary site access;
- Highway improvements at the A45, A46 and A444 to support improved access to Whitley Business Park. This will also include a new road bridge across the A45 to support access to the Whitley South development site (in Warwick District); and
- **Walsgrave:** Proposed inclusion of a new blue light access linking the A46 to the University Hospital as part of a new grade separated junction to replace the existing Clifford Bridge Road roundabout.

All scenarios have been run on a 'worst-case' basis to understand the potential impacts from additional vehicular traffic. Therefore, no adjustments for demand management, higher than average public transport patronage or increased walking and cycling have been made to the vehicle trip generation assumptions. The adoption and promotion of sustainably focused policies to achieve a real and sustained shift from private car use will be a priority for the Council; but equally it is important to know that the road network has the capability and resilience to accommodate the maximum additional demands placed upon it; within acceptable tolerances.

If all Local Plan development proposals are delivered within the plan period, it is estimated that the overall number of vehicle trips on Coventry's road network might increase by around 42% in the AM peak and 37% in the PM peak between 2013 and 2031, see table 10.1. Network delays per vehicle might be expected to increase by similar amounts, but due to the generally resilient highway network and relative lack of congestion compared to other major urban areas, modelling suggests that this would result in only a 1.4 minute increase in journey times per trip during the peak time.

**Table 10.1** - Cordoned Coventry Network CASM Highway Demand / Trip Rate Changes

	2013 AM Peak	2031 Local Plan Growth AM Peak	% change	2013 PM Peak	2031 Local Plan Growth PM Peak	% change
Cars	71,633	102,046		77,973	106,361	
HGVs	4,511	5,213		2,970	3,392	
LGVs	7,040	10,909		5,899	9,032	
<b>Total</b>	<b>83,185</b>	<b>118,169</b>	<b>+42%</b>	<b>86,842</b>	<b>118,786</b>	<b>+37%</b>

The further modelling work which takes account of all Local Plan growth proposals and planned road infrastructure measures reduces delay in the network to 33% in the AM peak and 28% in the PM peak. This equates to a reduction of over 20% when compared to only the do minimum scenario. Although total vehicle kilometres increase, the overall uplift in journey making is indicative of the improved connectivity across Coventry which will support increased economic growth and activity.

The most affected routes and junctions are primarily focused in the northwest of the city close to the periphery of the city centre, and to a lesser extent on major strategic corridors in the south and east of the city including the A45 and A46 corridors. This correlates with the anticipated increase in trips associated with the SUE sites in the west and northwest of the city at Eastern Green and Keresley and with planned employment growth in the south and east of the city including the University of Warwick, Whitley and Ansty Park. The greatest expected impacts on the highway network are primarily focused on the following routes:

- A4114 - Holyhead Road
- B4106 – Allesley Old Road / Spon End / Butts
- Coundon Road
- B4098 – Radford Road
- B4119 - Foleshill Road
- A4600 Walsgrave Road
- A428 Binley Road
- A45 corridor between Broad lane and the A46
- A444 north/south corridor
- A46 eastern bypass towards Ansty
- Stoneleigh Road on approach to the A46  
(not in Coventry)

To complement this, a set of sustainable development and travel policies have been developed which are designed to enable a greater availability of viable travel choices that can also promote healthier lifestyles, improved air quality and increased access to services, training, skills and education. These, along with high technology solutions to enable agile and home/remote working, can be expected to reduce the car mode share for all trip purposes from 61% to 51% in the morning peak period, a 10% reduction (table 10.2).

**Table 10.2** - Targeted 10% Reduction in Single Occupancy Car Use

Mode of Travel	Current Mode share	2031 Mode Share	% Change in Mode Share
Car Driver	44.6%	34.6%	-10%
Car Passenger	16.8%	17.8%	+1%
Cycle	1.8%	3%	+1.2%
Walk	26.6%	29.5%	+2.9%
Bus	8.9%	11.2%	+2.3%
Train	0.8%	1.5%	+0.7%
Other / increased home working	0.7%	2.4%	+1.7%
<b>Total</b>	<b>100%</b>	<b>100%</b>	

(Note. minor variations due to rounding)

Furthermore the general increase in trips, combined with changing working practices and advances in technology, is also likely to encourage an uptake in more agile and flexible working arrangements; thereby reducing the number of trips taking place during peak periods.

Achieving a change in behaviour will be most relevant to commuting trips; and if just 10% of all car borne commuters over the plan period were to change their time of travel to before or after the peak hour period, 4,500 trips would be removed from the network in the morning peak. The West Midlands 1,500 Point Survey (2015) shows that Coventry currently has a more concentrated morning peak period than any other local authority area in the West Midlands.

If the impact of change in time of travel is combined with outcomes achieved through targeted modal shift interventions (as outlined in table 10.2) this would reduce the overall increase in the number of trips as a result of Local Plan development as follows:

**Table 10.3** – Changes in Trips with Local Plan interventions

Travel Time Period	Total increase in trips as a result of Local Plan development	
	Worst-case scenario	With planned mitigation and behaviour changes
Morning Peak Hour	42%	24%
Evening Peak Hour	37%	19%

In addition to the above measures, the city is actively pursuing a programme of technology led transport improvements which focus on increasing journey time reliability, improved traveller confidence and travel information and streamlining payment systems. This is expected to make travel by different modes a more attractive and realistic option for a wider spectrum of the local population. Preliminary studies have suggested that on a corridor basis using technology to fine tune the performance of the transport network can release at least a 5-10% reduction in congestion benefits.

The IDP sets out the full package of measures which are considered to be essential to support the successful delivery of the Local Plan. With the delivery of these measures in combination with the delivery of sustainable transport policies and infrastructure, the predicted level of increase in traffic is considered to be manageable.

## Policy AC2: Road Network

1. New development proposals which are predicted to have a negative impact on the capacity and/or safety of the highway network should:
  - a. Mitigate and manage the traffic growth which they are predicted to generate to ensure that they do not cause unacceptable levels of traffic congestion, highway safety problems and poor air quality. Highway mitigation and management measures should focus firstly on demand management measures (Policy AC3) including the promotion of sustainable modes of travel, and secondly on the delivery of appropriate highway capacity interventions. Highway capacity interventions should be appropriate to the scale of development and expected impact and will be determined through the associated Transport Assessment.
  - b. Developments should seek to support and accommodate, where appropriate, measures which facilitate enhancements to the wider transport network including those set out in the Infrastructure Delivery Plan.
  - c. Be served by routes which are suitable for that purpose. Where this is not achievable, proposals will only be considered acceptable if appropriate interventions can be applied to suitably mitigate any negative impacts, including the construction of new access link roads.
2. The Infrastructure Delivery Plan sets out specific measures and funding sources for the transport network improvements which are required to support the delivery of the Local Plan. The level of financial contributions that will be sought from developers for highways infrastructure will be set out in the Council's Community Infrastructure Levy Charging Schedule. The Council may also seek to secure the provision of transportation infrastructure through planning conditions and legal agreements.
3. Further guidance will be contained in the Coventry Connected SPD.

## Network and Demand Management

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Highway resilience and journey time reliability are essential to supporting the needs of local businesses and the economic prosperity of the city. Coventry's existing highway network generally copes well with traffic incidents and peak flows; however congestion still exists in some areas during the peak period.

Evidence shows that a large proportion of existing peak car traffic consists of trips which start and finish within the city and are over relatively short distances, often less than two miles. As a priority, sustainable modes of travel will be promoted to reduce single occupancy car use for short journeys. However, it is recognised that as the city grows and the population and the number of jobs increase, other demand management measures will become increasingly important to maintain the integrity of the network.

The primary tools to achieve this are:

- Transport Assessments;
- Travel Plans;
- Car parking standards; and
- Urban Traffic Management and Control.

**Transport Assessments** - New developments will need to be considered on a case by case basis to determine the accessibility requirements by all transport modes, the anticipated levels of traffic generated and the impact this would have on the highway network. Transport Assessments will be required for larger developments which create significant additional trips on the network, and will be used to determine the severity of the impact, including congestion and road safety, and the appropriate type and level of mitigation required.

**Travel Plans** - Travel Plans play an essential role in encouraging sustainable transport and flexible and agile working practices to support the management and generation of traffic associated with trip attractors such as local businesses, schools, universities, hospitals, railway stations and new residential developments. They are the first step in mitigating transport related issues before implementing physical road infrastructure measures.

Travel Plan support can be provided by the Council and TfWM on the cheapest and most sustainable ways to travel including journey planning, ticket advice and any travel support.

Travel Plans should be updated regularly and monitored to maximise their effectiveness against agreed objectives and targets. Where applicable, these should be closely linked to Transport Assessments to act as a monitoring tool and action plan.

**Car Parking** – The provision of car parking can influence:

- The generation of traffic and the potential for congestion.
- Occurrences of inappropriate on-street parking which can:
  - Block access routes for emergency, refuse and delivery vehicles;
  - Block footways preventing access for pedestrians;
  - Impact negatively on the street scene; and
  - Reduce visibility for all users at junctions causing safety issues.
- The ability to encourage sustainable transport modes.
- The visual impact of car parking on the built environment

New developments will therefore be expected to provide appropriate levels of car parking in order to address these issues. Local car parking standards are set out in the Local Plan appendices. They have been developed based on NPPF criteria, locally determined accessibility criteria and benchmarking of other Local Authorities.

Detailed standards have been developed for areas outside of the city centre including car parking standards for new residential and business development. The provision of car parking in the city centre will be determined on a site-by-site basis. The objective of this approach is to discourage the excessive provision of private car parking in the city centre because:

1. Adequate levels of publicly available car parking are already provided across the city centre.
2. The city centre is highly accessible compared to other parts of the city, so can be easily accessed by more sustainable non-car modes of transport.
2. Development in the city centre is proposed to be of a much higher density; but this would not be achievable if high levels of private parking are provided.

The car parking standards also include requirements for the provision of electric car charging and cycle parking infrastructure.

Proposals for publicly available car parking in the city centre are set out in the CCAAP. This proposes a plan, monitor and manage approach to the provision of public car parking to ensure that a consistent and appropriate supply of parking is maintained to support new development proposals without having an unsustainable oversupply. This includes proposals to replace some existing surface level car parks with multi-storey car parking.

Urban Traffic Management Control (UTMC) - The on-going development of the UTMC system combined with the application of Intelligent Transport System (ITS) technologies will continue to be used to manage traffic on the highway network. Any new traffic control infrastructure required to support new developments must be compatible with, and where appropriate, link into the established UTMC network.

## Policy AC3: Demand Management

1. Transport Assessments will be required for developments which generate significant additional trips on the transport network. Thresholds for their requirement will be based on locally determined criteria set out in the Coventry Connected SPD.
2. Travel Plans will be required for new developments which generate significant additional traffic movements. Detailed guidance on the requirement for Travel Plans will be set out in the Coventry Connected SPD.
3. Proposals for the provision of car parking associated with new development will be assessed on the basis of parking standards set out in Appendix 5.
4. New development proposals which require changes to the highway network will be required to integrate with any existing UTMC and ITS infrastructure and strategy and development of the Key Route Network.
5. Further guidance will be contained in the Coventry Connected SPD

## Walking and Cycling

Walking and cycling offer a range of benefits, for example, they are highly cost effective, do not emit carbon or harmful pollutants which affect air quality, and do not contribute significantly to road traffic congestion. Perhaps the most significant advantages which are offered by these active travel modes are the physical and mental health benefits. However, approximately 60% of all trips in the city are currently made by car, yet only 2% are made by bicycle.

Coventry has a reasonably well-developed cycling and walking network which has benefited from recent initiatives including the city centre public realm programme and the Cycle Coventry project. These schemes have helped to make a positive contribution towards the creation of an environment which encourages sustainable and active modes of travel. The Council will build on the successes and momentum gained from these projects and intends to implement additional phases of them in tandem with the growth of the city.

The expansion of safe cycling and walking networks will be complemented by a hierarchy of inter-connected “quiet streets”. This will be achieved through the physical control of through-traffic, where appropriate, and implementing measures to minimise vehicle speeds through high quality urban and highways design and infrastructure. This concept will be prioritised through the development of SUE sites. Further guidance will be set out in the Coventry Connected SPD.

## Cycling

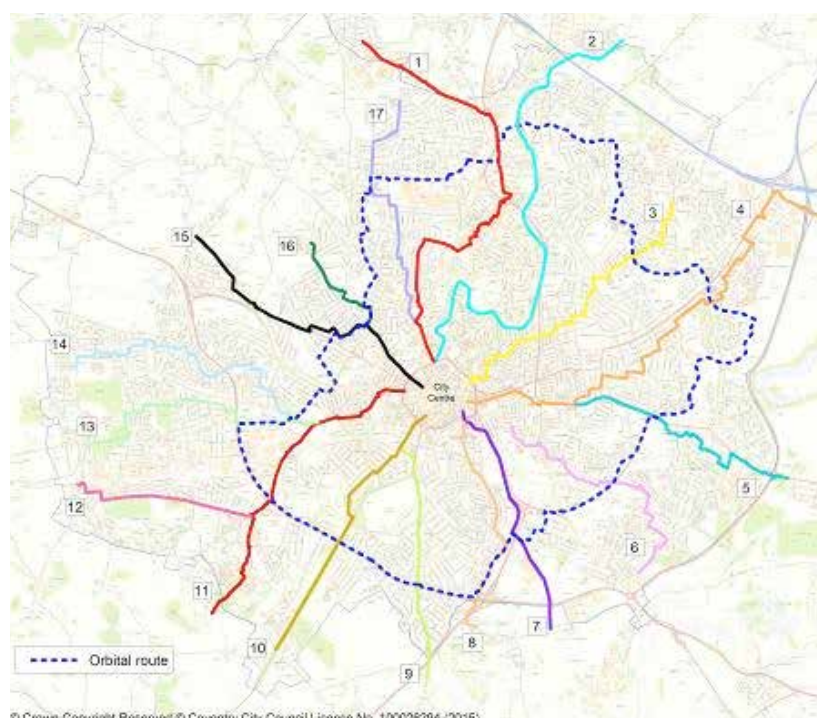
The first phase of the Cycle Coventry project helped local people to take up cycling through the delivery of seven new cycle routes in the north and south west of the city which were supported by a package of training and practical support. This has helped to deliver the first stages of the wider Cycle Coventry cycle network which is made up of 17 strategic cycle routes linked by an orbital route.

The West Midlands Cycle Charter also aims to raise cycling levels, and deliver change. The charter sees cycling as playing an important role in addressing the challenges the West Midlands face, which include reducing congestion, carbon and pollution, supporting economic growth and employment, tackling obesity and creating places where people want to live, work, learn, shop and do business.

The Cycle Charter also supports a Metropolitan Cycle Network which will be integrated with local cycle networks.

Opportunities will be sought to deliver additional phases of the network as part of new development proposals. For larger developments, financial contributions may be required which support the enhancement of cycle routes on the wider highway network which are consistent with the IDP and local cycling strategy. High quality cycle parking should also be provided at new sites and along the wider public transport network at interchanges and stations.

**Figure 10.3** - Proposed Cycle Coventry Cycle Network





New developments must consider the needs of cyclist and where appropriate, provide dedicated high quality, safe and direct cycle routes and infrastructure which integrate with the established cycle network. This may require the upgrading of existing cycle facilities to a more appropriate standard which is relative to the scale of development. For example, the widening of existing cycle routes and footways, the addition of street lighting or new/upgraded priority crossings.

In accordance with the Manual for Streets, cyclists should generally be accommodated on the carriageway in areas with low traffic volumes and speeds. Dedicated off-carriageway infrastructure will be required alongside more heavily trafficked routes and at intersections. Opportunities will also be sought to develop cycle routes through areas of greenspace which provide opportunities for leisure cycling and direct quiet routes to surrounding areas and amenities. Other supporting measures such as advanced stop lines, directional signage and lighting form an important part of the cycle network and will be expected to be integrated into all major development proposals.

Cycle parking, in combination with shower/changing and clothing storage facilities are an essential part of supporting the needs of cyclists and should be catered for. Cycle parking standards are set out in the car parking standards in Appendix 5. The Coventry Connected SPD includes a local strategy for cycling which includes guidance on requirements for cycle route provision, and other supporting infrastructure requirements.

## Walking

In addition to being healthy and sustainable, walking is perhaps the cheapest and most accessible mode of transport and forms at least part of every journey. Development proposals which are expected to generate additional trips on the transport network must consider the needs of pedestrians and where appropriate provide convenient and safe pedestrian routes to and through the site which link seamlessly to the existing pedestrian route network.

The type of provision should be determined based on the expected level and speed of traffic and the location and type of development proposal. In many circumstances off-carriageway footways will generally be the preferred option. However, in quieter residential areas, within the city centre and areas where the ratio of pedestrians to traffic is high it may be appropriate to provide shared pedestrian / vehicle surfaces which encourage higher levels of interaction between different travel modes. On more heavily trafficked routes, pedestrian priority measures such as controlled crossing points will be required to make walking as safe and convenient as possible.

## Policy AC4: Walking and Cycling

1. Development proposals should incorporate appropriate safe and convenient access to walking and cycling routes. Where these links do not exist, new and upgraded routes will be required and these must appropriately link into established networks to ensure that routes are continuous. The expected type of provision will depend on the scale, use and location of the site. For larger developments, financial contributions may be required to support improved pedestrian and /or cycling routes on the wider network. Further details will be set out in the Coventry Connected SPD.
2. A complementary network of connected Quiet Streets will be developed which include physical measures to control and restrict certain traffic movements and vehicle speeds to create an environment where walking and cycling are the preferred modes of transport. These will prioritised through the development of SUE sites, but will also be considered within existing areas of the city which are negatively affected by increased traffic associated with new development. Financial contributions will be sought to deliver those proposals where the predicted impact of development traffic is significant and measures are needed to support an improved pedestrian and cycle environment.



3. Further details will be set out in the Coventry Connected SPD.
4. High quality cycle parking and associated facilities, such as changing, shower and storage, as part of new development proposals. The expected level of provision should be based on the cycle parking standards set out in the Appendix 5.

## Public Transport

### Bus Services and Infrastructure

Buses offer a realistic modal choice for many local trips, and particularly those into the city centre. Bus network coverage across the city is generally good although there are some examples of where service frequencies are inadequate to provide an attractive and realistic option, such as more peripheral edge of town employment sites.

Coventry's Bus Network Development Plan and bus policies as highlighted in the Strategic Transport Plan demonstrate the importance of a partnership approach with TfWM. This will be vital in providing high quality bus services to new developments.

To ensure bus travel is an attractive and convenient option, new development must comply with TfWM access standards and be expected to have access to a bus stop within 400m, with regular service patterns serving the city centre. It is accepted that this may not be practicable for small scale development proposals in more remote parts of the city but developers will be encouraged to liaise with the Council and TfWM to ensure access standards are fully met. For larger development sites, in particular those in more peripheral locations, it will be important that bus services are fully integrated into the whole sites footprint with provision made to accommodate appropriate bus infrastructure including bus shelters and passenger information. Through routes for buses along with suitable bus priority measures should also be provided wherever possible and the Council will work in consultation with developers, bus operators, TfWM and the Passenger Transport Executive to achieve this.

The existing bus network primarily follows the radial network of roads across the city, and whilst this supports good access to the city centre, it does not necessarily support the demand for orbital trips such as those between residential and edge of town employment sites. More recently operators have introduced orbital services which have helped to address this issue.

The West Midlands Strategic Transport Plan sets out a strategy for a core bus network which is closely integrated with a high frequency rail and rapid transit network to enhance connectivity to other strategic centres across the West Midlands.

### Interchange, Information and Ticketing

One of the major barriers to encouraging public transport is the need to interchange between different modes and services, often paying separately each time at the point of use, and often with inadequate prior knowledge of when and where the next service will be. A step change is required in the quality of public transport provision which will require complementary measures to:

- Improve the ease of access to interchange facilities and to the quality of the waiting environment within them;
- Provide quality and timely information, both at bus stops and remotely via mobile devices, that can reduce uncertainty for travellers;
- Make payment quick and convenient through the introduction of integrated ticketing systems and cashless smart payment methods which work across all modes and services.

## Rapid Transit

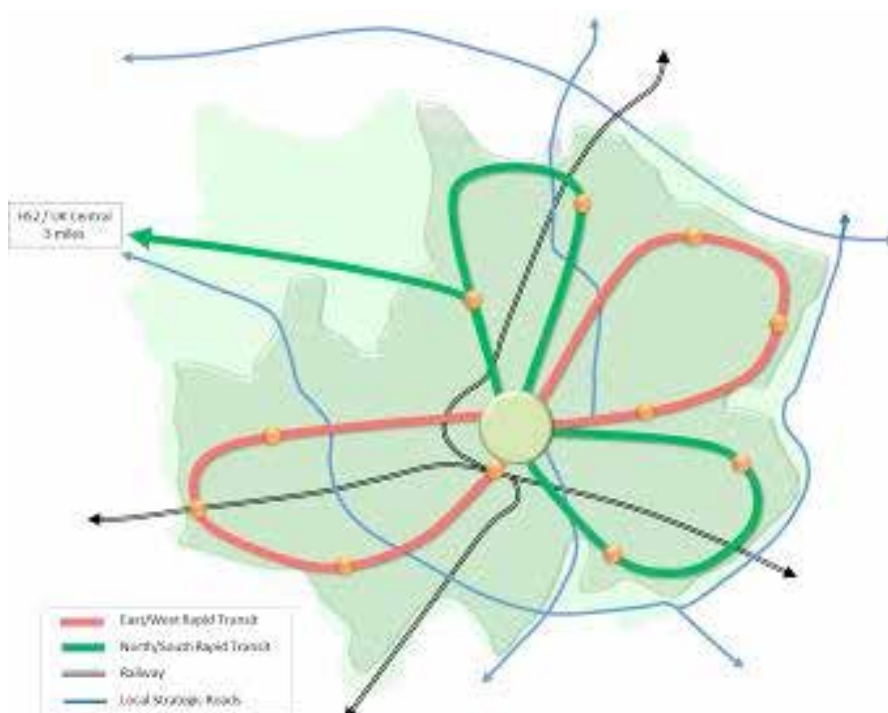
In order to manage congestion to acceptable levels and maintain network resilience throughout the plan period, additional public transport provision will be required. To support jobs-led growth in the city, it is apparent that the current public transport network will not adequately address all of additional demands, or meet the expectations of the modern business sector. It is clear that a step change is required to remedy this, and the development of a high quality rapid transit system provides an appropriate and viable solution.

The West Midlands Strategic Transport Plan sets out comprehensive network of rail and rapid transit routes across the Metropolitan area including a new Rapid Transit network for the Coventry area.

Major trip generators such as the city centre, Ansty Park, Whitley Business Park, the Universities and the Hospital will be a priority for the provision of high quality rapid transit services. Routes will also serve Coventry main railway station and other transport interchanges to enable close integration with local and national transport networks. Options are also being considered for improved public transport connectivity to proposed HS2 interchange and the UK Central proposal in Solihull through the HS2 Connectivity Package. The identification and feasibility of individual routes will be subject to further study and delivered through the Coventry Connected Transport Strategy and the West Midlands Strategic Transport Plan.

In addition to supporting the needs of existing employment sites, rapid transit also provides a way of unlocking potential development growth sites by significantly improving accessibility. The high quality, fast and reliable nature of rapid transit increases the viability and attractiveness of services and offers a realistic alternative to local car journeys.

**Figure 10.4** - Indicative Coventry Rapid Transit Network



## Policy AC5: Bus and Rapid Transit

1. New major development proposals should have safe and convenient access to the existing bus network and comply with the TfWM access standards. In areas where this is not achieved, new development may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.
2. The development of a rapid transit network will be supported to improve accessibility to existing and new major trip attractors. Major development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to make provision for those routes, including new infrastructure to facilitate the integration of the rapid transit network into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.
3. Further details will be set out in the Coventry Connected SPD, the West Midlands Strategic Transport Plan and Coventry's Bus Network Development Plan.

## Rail Services

Building on its core rail connectivity assets, including excellent rail links on the West Coast Main Line (WCML) between Coventry, London and Birmingham, the Council has developed an ambitious evidenced based rail investment strategy. The strategy sets out a clear case for the need to radically improve rail services which support the economic travel to work area such as services on the north-south corridor between Coventry, the Thames Valley, Warwickshire and the East Midlands<sup>9</sup>. Allied to this, the Council is investing in the delivery of the Coventry Station Masterplan which will result in improved integration between rail and other modes of transport and the adjacent Friargate regeneration scheme.

The delivery of the Coventry Station masterplan redevelopment will improve transport interchange facilities and enable the predicted growth in rail passengers to be accommodated. The scheme includes improvements to pedestrian accesses, car parking, bus interchange facilities, cycle parking and a new bay platform to facilitate the delivery of the NUCKLE rail scheme.

Existing stations at Tile Hill and Canley predominantly cater for local rail services between Coventry and Birmingham, although Tile Hill offers some longer distance journey options as far as London. Both stations also act as rail Park and Ride facilities, although the car parks continue to operate at, or near capacity. Measures which address capacity issues will be supported including better integration with bus and rapid transit networks, walking and cycling routes and appropriate capacity enhancements to station car parking.

Additional local rail stations on the WCML to the east of the city serving Willenhall and Binley would allow some of the strong local rail service demand to be met and support the regeneration and economic growth of this part of the city. However, this will need to be considered in the context of wider strategic rail industry plans which plan for capacity on the busy WCML. Options are also being explored for a new station in the south of the city to support new development growth. These stations are also identified in the West Midlands Strategic Plan.

Line capacity between Coventry and Birmingham is constrained which causes competition between fast long distance and local stopping services. It is clear that major infrastructure improvements will be required to meet the growing demands to support the growth of the city. Proposals to expand capacity on the WCML which support Coventry's rail connectivity objectives will be supported.

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<sup>9</sup> Coventry Rail Investment Strategy (2013)

## High Speed Rail (HS2) and West Coast Main Line (WCML)

The government is proposing to construct a new high speed railway between London and the north called HS2. The first phase of this scheme includes a new station located close to Birmingham International station approximately four miles from the western boundary of Coventry. Solihull Metropolitan Borough Council is promoting a masterplan called UK Central (UKC) which includes plans to create up to 100,000 new jobs and new housing growth.

It will be important that Coventry is well connected to UK Central and able to form part of a broader UK Central Plus economic offer supported by excellent highway and public transport services. This will enable Coventry to continue to develop and be a major sub-regional hub for growth supporting services and economic activity across the whole area. For example, significant benefits could be gained through improved connectivity to high profile employers and development sites which are located on linked economic growth corridors including the A45 / A46 and M6 including the University of Warwick, Jaguar Land Rover and the area around Whitley and Coventry airport. Existing constraints along these corridors may impede the demands of potential growth and it is likely therefore that measures may be required to improve connectivity along new and improved transport corridors in or adjacent to Coventry. Proposals which enhance that connectivity will be supported.

The construction of HS2 is likely to affect service patterns on the WCML to reflect the introduction of new high speed services. It will be important that existing services which support the local growth agenda are protected, and opportunities are seized which support improved connectivity objectives in the Coventry Rail Investment Strategy.

### Policy AC6: Rail

1. Proposals which improve the quality of local rail services and access to stations and rail interchange facilities will be supported. These include:
  - a. Improved access to rail stations, including HS2, by all modes of travel;
  - b. Improved interchange facilities between rail and other modes; and
  - c. Enhancements on the rail network which increase the frequency and quality of rail services which serve Coventry.
2. Measures which support the delivery of objectives in the Coventry Rail Investment Strategy for improved rail connectivity will be supported. This includes measures which facilitate improved rail services and supporting rail infrastructure on the Coventry north-south corridor between Leamington, Kenilworth, Coventry, Bedworth, Nuneaton and Leicestershire.
3. Proposals for additional local railway stations on the east-west and north/south rail corridor within Coventry will be supported where they are proven to be viable, support growth objectives and are consistent with the relevant national, regional or local rail strategies.
4. Further details are set out in the Coventry Connected SPD, Coventry Rail Investment Strategy and the West Midlands Strategic Transport Plan

## Freight

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### Road Freight

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The efficient movement of freight is essential to support economic growth. In addition to supporting existing businesses, freight movements provide opportunities to generate additional employment through the creation of logistical and freight industries. The central location of Coventry and its high level of access to the strategic route network strengthens this opportunity.

On-street lorry parking, particularly around major employment and distribution sites, can create highway safety issues. These issues arise through a combination of factors such as specific delivery slots resulting in vehicles waiting on-street, and a lack of dedicated onsite HGV parking. Where new developments are expected to require large numbers of lorry movements, appropriate parking and turning facilities must be provided onsite to minimise disruption on the public highway.

### Rail Freight

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There is currently limited scope for additional rail freight access within the city. Opportunities for additional facilities which arise within the plan period will generally be supported, but will need to be assessed on their individual merit and be consistent with the relevant rail industry plans.

### Air Freight

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The role and usage of Coventry airport has fluctuated over time but it continues to cater for business/general aviation, air mail, bulk freight and other niche functions. Having good local access to air freight facilities offers opportunities to improve supply chains and therefore attract new investment into the area.

## Policy AC7: Freight

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1. New developments on sites which generate or are likely to generate significant HGV movements must accommodate appropriate on-site lorry parking and turning facilities to minimise disruption and safety issues on the public highway.
2. New development which supports the use of rail and air freight facilities will be supported where there is an evidenced demand, proposals are consistent with the relevant air and rail industry plans, have an acceptable environmental impact and do not significantly compromise the capacity and safety of the local highway network.

# 11. Environmental Management, Minerals and Waste

## Relevant Evidence Base

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- West Midlands Climate Change Partnership Climate Change Adaptation and Resilience Study Summary Report - Halcrow (2010).
- Coventry City Council Low Carbon Energy Study – AECOM (2010)
- Coventry City Council Climate Change Strategy (2012)
- Delivering a More Sustainable City Supplementary Planning Document. (2009)
- Evidence base to support planning policies relating to sustainable buildings and low carbon/ renewable energy (2015)
- Additional evidence; Coventry District Energy City Centre Phase 1 district network (2015)
- West Midlands Low Emissions Towns and Cities Programme (2014)
- Draft Surface Water Management Plan Risk Assessment (2012)
- Draft Local Flood Risk Management Strategy (2016)
- Preliminary Flood Risk Assessment, Coventry City Council (2011)
- Strategic Flood Risk Assessment Report - JBA Consulting (2015)
- Water Cycle Study – AMEC (2015)
- Coventry University, SuDs Technical Feasibility Report (2012)
- A GIS based decision to support methodology at local planning authority scale for the implementation of sustainable drainage, Coventry University - Dr. Warwick, F (2014).
- Coventry Municipal Waste Management Strategy, 2008-2020.
- Guide for Mineral Safeguarding in England' produced by the British Geological Survey (BGS) (2007)
- Draft West Midlands Local Aggregates Assessment (2015)

## Introduction

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**Climate change and its potential impact on the urban and natural environment is recognised as one of the most significant challenges facing all communities across Coventry and beyond. In the Coventry context, it is essential that the way in which the city develops over the plan period and beyond is set within the context of mitigating the impacts of climate change and adapting to the effects on the local environment.**

The key components of how Coventry can develop a more sustainable future include the following policy areas:

- Planning for Climate Change;
- Water Quality and Flood Risk;
- Air Quality;
- Minerals and Waste.

Coventry's Climate Change Strategy sets out several objectives to reduce carbon emissions. Objective 1 directly relates to how all future development in the city must contribute to achieving this which states:

*"to have a joint programme, working with other organisations in the city, to reduce carbon dioxide*

*emissions by 27.5% by 2020. The 27.5% target is based upon a 2005 baseline and is equivalent to the national carbon dioxide emissions target of 34% by 2020 which has a 1990 baseline leading to the difference in percentages”.*

## Planning for Climate Change

Infrastructure and buildings are the key components of a successful city. As the effects of climate change become more apparent, these important elements of the city will need to be adapted to work in equilibrium with more pronounced extreme weather conditions. Planning for climate change adaptation should therefore become part of every development. Adaptation methods can include, but are not limited to:

- Using materials so they can adapt to extreme weather, for example, using lighter coloured materials to reflect sunlight thus cooling buildings;
- Incorporating thermal mass, shading devices and night time cooling strategy into building design in order to prevent overheating;
- Installing sustainable drainage systems such as permeable paving and infiltration devices. These reduce the risk of flash flooding. Depending on the particular type used, SUDS can also have other benefits such as a reduction in water pollution and a decrease in the urban heat island effect.

National planning policy acknowledges that planning has a key role to play in minimising vulnerability and providing resilience to the impacts of climate change and that local authorities should adopt proactive strategies to mitigate and adapt to climate change. It is important that buildings are designed to ensure resilience not just in the short term but throughout the anticipated lifetime of the building. This should include designing buildings to keep cool and warm without using power through the use of appropriate construction materials, layout and building orientation and the use of green infrastructure for urban cooling, shading, heating and night time cooling. Consideration should also be given to the need for water conservation through a range of water efficiency measures such as the use of low water sanitary equipment, grey water recycling systems and rain water harvesting from water butts to large storage systems.

### Policy EM1: Planning for Climate Change Adaptation

1. All development is required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of the following adaptation measures:
  - a. using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures;
  - b. optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading,
  - c. incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment
  - d. minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SUDS in accordance with Policy EM4;
  - e. Where applicable, maintain and enhance the canal network to reflect the canals' role in urban cooling.
  - f. seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change.
2. Applicants will be required to set out how the requirements of the policy have been complied with including justification for why the above measures have not been incorporated.
3. Where justification for non-compliance with the requirements is based on viability, this will need to be clearly demonstrated through an open book financial appraisal.



Some of the measures identified in this policy also fulfil other functions. For example, the appropriate provision of green infrastructure also has an important recreational and ecological role. This supports the provision of multi-functional green spaces and supports the most efficient use of developable land. Adapting to the future climate should therefore be seen as important in the delivery of well-designed sustainable communities.

It is recognised that the scale and nature of certain developments may mean some of the adaptation measures listed would not be suitable. For example, extensions or change of use proposals may not present the opportunity to incorporate green infrastructure. Where this is the case, applicants should demonstrate that they have sought to maximise resilience to the impacts of climate change in other ways, particularly in respect of Building Regulation requirements and water conservation.

## Policy EM2: Building Standards

1. New development should be designed and constructed to meet the relevant Building Regulations, as a minimum, with a view to:
  - a. Maximising energy efficiency and the use of low carbon energy;
  - b. Conserving water and minimising flood risk including flood resilient construction;
  - c. Considering the type and source of the materials used;
  - d. Minimising waste and maximising recycling during construction and operation;
  - e. Being flexible and adaptable to future occupier needs; and
  - f. Incorporating measures to enhance biodiversity value.
2. In meeting the carbon reduction targets set out in Building Regulations, the Council will expect development to be designed in accordance with the following energy hierarchy:
  - a. Reduce energy demand through energy efficiency measures.
  - b. Supply energy through efficient means (i.e. low carbon technologies).
  - c. Utilise renewable energy generation.
3. A Sustainable Buildings Statement should demonstrate how the requirements of Climate Change policies in this Plan and any other relevant local climate change strategies have been met, and consider any potential coal mining legacy issues including land stability.
4. A comprehensive update of the Delivering a More Sustainable City SPD incorporating the approach to Building Sustainability Standards will be developed.

The Council intends to take a leading role in identifying new and existing opportunities for Decentralised Energy Networks (or DENs for short) through heat and energy recovery. The construction methods and standards of all buildings can help reduce local climatic effects and ensure better adaptability to changing circumstances. The Government has identified this issue as a priority through the National Planning Policy Framework, Para's 93-95.

In meeting the requirements of this policy developers should, where relevant and applicable, demonstrate the performance of their proposals against the relevant national standard or code. Currently, there is not a non-domestic equivalent of the Code but the Building Research Establishment Environmental Assessment Method (or BREEAM for short) is a voluntary assessment scheme that covers areas ranging from management, health and well-being, energy, transport, water, materials and waste, land use and ecology, and pollution aspects of non-residential building performance. This is the most comprehensive assessment tool available to assess non-residential buildings and its standards range from Pass to Good, Very Good, Excellent and Outstanding.

The built environment remains the largest single contributor of carbon dioxide at 40% of the city's total with homes and transport having emissions of 36% and 24% respectively. It will be the case that the strategic sites designated on the Policies Map will have a major role to play in achieving an increase in the level of decentralised low and zero carbon energy supplies that can be made available.

Any prospective developers investing in the identified strategic sites should consider bringing forward development schemes that could take advantage of any existing and planned decentralised energy network. Developments that would be expected in these areas would offer the economies of scale necessary to include combined heat and power generation or a network connection to an existing energy network. The indicative route of the phase 1 heat network is shown on the Policies Map. The Council will encourage applicants to connect to the network, wherever practicably possible or demonstrate how the objectives of this policy have been met through alternative equivalent carbon solution in the Sustainable Buildings Statement.

Consideration of the city's coal mining legacy should also be included within the Sustainable Building Statement having regard to maps and information published by the Coal Authority.

## Policy EM3 Renewable Energy Generation

1. Proposals for the installation of renewable and low carbon energy technologies, including both building-integrated and standalone schemes will be promoted and encouraged, provided that:
  - a. any significant adverse impacts can be mitigated;
  - b. where biofuels are to be utilised, they should be obtained from sustainable sources and transportation distances are minimised;
  - c. any energy centre is suitably located and designed to a high quality such that it is sympathetically integrated with its surroundings;
  - d. all proposals are consistent with any relevant Policies in this Plan.

Renewable energy can be supplied at a national level from sources such as large, off shore wind farms, solar farms or hydroelectric schemes. Although not a source of renewable energy, nuclear power is a major low carbon source. Locally, smaller and on-site renewable energy schemes include solar photovoltaic, solar thermal, ground source and air source heat pumps and, where fuelled by biomass or biogas, district energy schemes and combined heat and power plants (CHP). Due to the lack of large areas of open space within the city, on-site and neighbourhood-scale renewable energy schemes are the most effective way for Coventry to contribute to renewable energy targets set out by the Government.

Although wind turbines are a good example of a renewable energy source, around 90% of Coventry is unsuitable for wind turbines due to insufficient wind speeds, and the density of development. This has been evidenced through a local wind mapping study carried out in 2010. As such, Policy EM3 does not apply to any proposals for wind turbines or wind farms. Instead any such proposals will be considered in accordance with the most up to date national policy.

The indications from the evidence base identify there will be a greater need to encourage and support a wider spectrum of renewable energy technologies to help deliver the energy supply that would be placed on the grid as a result of the levels of growth planned for the city. Therefore, as part of the strategic sites detailed in this Plan, any proposed development schemes will be expected to consider and incorporate, where viable, renewable energy generation technologies as part of the overall suite of energy supply.

## Water Quality and Flood Risk

It is important to apply this policy in the context of the Council's Local Flood Risk Management Strategy and Surface Water Management Plan to ensure that all links are made to the aims and objectives of these plans. This will help ensure that the areas identified as at risk of flooding, either fluvial or surface water, are fully considered where applications in such areas are received.

### Policy EM4 Flood Risk Management

- 1.** All major developments must be assessed in respect of the level of flood risk from all sources. If development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where all of the following criteria are met:
  - a.** the type of development is appropriate to the level of flood risk associated with its location with reference to Coventry's Strategic Flood Risk Assessment (SFRA) flood zone maps and advice on appropriate uses within these zones from the Environment Agency and/or Lead Local Flood Authority;
  - b.** it is provided with the appropriate minimum standard of flood defence and resilience to aid recovery (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development;
  - c.** it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity;
  - d.** in the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk;
  - e.** in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events.
- 2.** All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage. In this instance reference should be made to the Council's IDP or Regulation 123 list. In order to achieve this:
  - a.** the functional floodplain (Flood Zone 3b) should be protected from development and reinstated in brownfield areas wherever possible;
  - b.** single storey buildings, basements and buildings on stilts will not be acceptable in Flood Zone 3;
  - c.** all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged;
  - d.** unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m (from the top of bank or toe of a flood defence) of Main Rivers and 5m from Ordinary watercourses for maintenance access. This includes existing culverted watercourses.
  - e.** finished floor levels must be set a minimum of 600mm above the 1% AEP (1 in 100 year) plus climate change flood level.

Where a development benefits from an existing or proposed flood defence scheme, the development should contribute towards the capital and/or maintenance of these defences over its lifetime.

- 3.** For sites in Flood Zone 3a, development should not impede flow routes, reduce floodplain storage or consume flood storage in a 'flood cell' within a defended area. If the development does result in a loss of storage, compensatory floodplain storage should be provided on a 'level for level' and 'volume for volume' basis.

4. For sites in Flood Zone 3a, all types of new development behind flood defences should be avoided, where possible, due to the residual risks of breach and overtopping. Development should ensure that it would not prevent the water bodies' ability to reach good status or its potential to do so as set in the Severn River Basin Management Plans and should support, where possible, to improving the status class.
5. A sequential, risk-based approach to the location of suitable development will be undertaken by the Council based on the Environment Agency's latest flood maps, SFRA flood zones and Vulnerability Classification to steer new development to areas with the lowest probability of flooding avoiding, where possible, flood risk to people and property and managing any residual risk.
6. The Exception Test (for use when there are large areas in Flood Zones 2 and 3, where the Sequential Test alone cannot deliver acceptable sites, but where some continuing development is necessary) will apply where development will provide wider sustainability benefits that outweigh flood risk, fully informed by an appropriately scaled Flood Risk Assessment (FRA) which indicates that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible reducing flood risk overall.
7. Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme they may be expected to contribute towards the cost of delivery and/or maintenance of that scheme in accordance with Policy IM1.
8. A Flood Risk Assessment is required, appropriate to the scale and nature of the development proposed, where the development is:
  - a. within a river floodplain, as defined by the Coventry SFRA indicative flood zone maps;
  - b. within 20 metres of any watercourse;
  - c. adjacent to, or including, any flood bank or other flood control structure;
  - d. within an area where there may be surface water issues and drainage problems;

In accordance with the National Planning Policy Framework, the overall aim of this policy is to direct development away from areas of high flood risk and avoid inappropriate development in areas at risk of fluvial and pluvial flooding. Where development cannot take place in areas of low flood risk, a sequential test should be applied in which it is acknowledged that extensive areas of built development fall into the high risk areas and that the re-use of previously developed land may be needed to avoid economic stagnation. Where in the wider overall interest, development is supported as an exception to this policy with high risk areas, applicants will need to demonstrate that they strictly comply with all criteria of the policy.

The Environment Agency has produced flood zone maps for local and other watercourses, as well as surface water. The maps are based upon the approximate extent of flooding and are indicative only, being based on the best information available at the time. These maps should be used as a basis for consultation and not for decision making. The most up to date indicative flood zone maps are available from the Environment Agency. Additional information may be obtained by contacting the Council's Flood Risk Management and Drainage team, in addition to the maps that accompany the 2015 SFRA.

SFRA maps show both fluvial flood zones and areas subject to surface water flooding in the city. The flood zone maps show the level of risk and appropriate uses within them. The fluvial flood zones are, Zone 1, being the low probability zone where all land uses are considered acceptable; fluvial Zone 2 which carries medium risk and essential infrastructure and where water compatible uses which are less vulnerable are appropriate; fluvial Zone 3 which is the flood plain and only suitable for water compatible and less vulnerable uses. The surface water flooding indicates the areas of the city that are subject to predicted pluvial flood risk within formerly defined fluvial flooding Zone 1. The Council has undertaken a level one

and level two Strategic Flood Risk Assessment (2015), which has provided the evidence to directly inform the allocation of land for new development over the plan period. This has also provided a basis for a strategic policy to set a framework for more site-specific Flood Risk Assessments (FRAs) by:

1. choosing sites outside flood risk zones as far as practicable;
2. controlling development within flood risk areas and the types of development which may be considered;
3. assessing opportunities to facilitate the relocation of development;
4. incorporating measures to address flood risk from all new developments, such as sustainable urban drainage systems (SuDs), as set out in policy EM5.

## **Policy EM5 Sustainable Drainage Systems (SuDS)**

1. All development must apply SuDS and should ensure that surface water runoff is managed as close to its source as possible.
2. SuDS are the preferred way of managing and conveying surface water. All developments will consider and demonstrate how the following hierarchy for the discharge of surface water from a site will be applied:
  - a. Discharge by infiltration and water reuse technologies.
  - b. Discharge to a watercourse allied with water reuse technologies.
  - c. Discharge to surface water sewer allied with water reuse technologies.
3. All development should carry out infiltration tests and a ground water risk assessment, including seasonal groundwater monitoring, to demonstrate whether infiltration is possible and that ground water would not be polluted to Environment Agency and Lead Local Flood Authority requirements. Where it is proven that infiltration is not possible, allied with water reuse technologies, surface water should be discharged into a watercourse (in agreement with the Environment Agency and Lead Local Flood Authority) at a rate no greater than Qbar greenfield runoff, or an appropriate minimum rate for small sites, agreed by the Lead Local Flood Authority. If there is no watercourse available then, allied with water reuse technologies, surface water should be discharged to a surface water sewer at a rate no greater than Qbar greenfield runoff.
4. In exceptional circumstances, where a sustainable drainage system cannot be provided, it must be demonstrated that it is not possible to incorporate sustainable drainage systems, and an acceptable means of surface water disposal is provided at source which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation with a reduction in peak and total discharge.
5. The long-term maintenance arrangements for all SuDS must be agreed with the relevant risk management authority. A separate SPD will be produced to detail how SuDS schemes will be designed in accordance with the technical standards set out by the Coventry Lead Local Flood Authority and by the Department for Environment, Food and Rural Affairs.

SuDS involve a range of techniques that mimic the way that rainfall drains in natural systems and avoids any increase in flood risk and improves water quality. Many existing drainage systems can cause problems of flooding, pollution or damage to the environment and are not proving to be sustainable in the long term. The key objectives in the use of SuDS are:

- reducing flood risk and mitigating the impacts of climate change;
- maintaining and restoring natural flow routes together with the rate and volume of surface runoff to reduce the risk of flooding;

- improving the water environment quality;
- minimising diffuse pollution;
- reducing pressure on the sewerage network;
- improving habitat, biodiversity and local amenity;
- harness opportunities to incorporate multi-functional uses such as green space play areas.

The Council is also the Lead Local Flood Authority (or LLFA for short) with responsibility for developing, maintaining and monitoring a Local Flood Risk Management Strategy in partnership with other relevant bodies in the area. In addition, the LLFA is a statutory consultee on all major planning applications and a consultee on a non-statutory basis on all minor applications whilst also advising on the approval of all sustainable drainage and related systems, surface flooding and ground water for all planning applications.

In respect of SuDS, it is important to emphasise the need for a management train where drainage techniques can be used in series to change the flow and quality characteristics of the runoff in stages. For a management train to work effectively the train must contain the right type of SUDS. The detail for this would be set out in the SPD, but all consideration should be given to the principle by ensuring developments implement source controls as part of the management train. In environmental terms this approach is good for water quality. With respect to future maintenance, it places the responsibility with the development owner and reduces or eliminates runoff from the small rainfall events which constitute the majority of rain events.

## Policy EM6: Redevelopment of Previously Developed Land

1. Development will be permitted where proposals do not have a negative impact on water quality, either directly through pollution of surface or ground water or indirectly through the treatment of waste water by whatever means.
2. Prior to any potential development, consultation must be held with Severn Trent Water to ensure that the required wastewater infrastructure is in place in sufficient time. In line with the objectives of the Water Framework Directive, development must not affect the water bodies' ability to reach good status or its potential as set in the Humber and Severn River Basin Management Plans and should support, where possible, to improving the status class.
3. Developers and operators must provide adequate information when submitting their proposals so that the potential impact on groundwater resources and quality can be adequately assessed'. This should include a risk assessment demonstrating there would be no adverse effect on water resources.
4. Development will not be permitted within a groundwater Source Protection Zone 1 which would physically disturb an aquifer. This will include situations where proposed waste water infrastructure could pose an unacceptable risk of pollution of the underlying aquifer or receiving watercourse.

When promoting land affected or potentially affected by contamination developers and site promoters are actively encouraged to engage with the Environment Agency as early as possible in the planning process to follow the risk management framework provided in CLR11 - Model Procedures for the Management of Land Contamination (2004). Furthermore, it is advised to refer to the Environment Agency's Guidance on Requirements for Land Contamination Reports (2005) for the specific type of information that we require to assess the risks to Controlled Waters.

The Environment Agency require the risk to groundwater of any significant contamination to be considered by a desk study, site investigation and subsequent conceptual model and risk assessment, where necessary leading to suitable remedial action and related method statement. This is in accordance with the NPPF (Para 109 -112), which indicates that where development is proposed on land that is known or



suspected to be affected by contamination then the risks to human health and the wider environment should be assessed by the applicant for consideration by the LPA prior to determination.

The assessment should provide such information as is necessary to determine whether the proposed development can proceed. Where such assessment shows that remediation is required then the standard of remediation that should be achieved through the grant of planning permission for new development is the removal of unacceptable risk and making the site suitable for its new use, including the removal of existing pollutant linkages. All receptors relevant to the site should be protected to an appropriate standard. As a minimum, after carrying out the development and commencement of its use, the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

Development proposals will need to comply with the Environment Agency publication 'Groundwater Protection: Policy and Practice' (GP3) which may require development to be restricted at certain locations with a need to give careful consideration given to the potential water quality risks and impact on flooding and surface water drainage.

## Air Quality

As previously highlighted in the Accessibility chapter of this Plan, the whole of Coventry is designated as an Air Quality Management Area and has been since 2009. Emissions from road transport are the major source of pollution in Coventry, with emissions from industry also contributing. It must be recognised that transport requirements associated with the construction phase itself has a negative impact upon air quality. Under Part IV of the Environment Act 1995, the Council carries out annual review and assessment of air quality in the city, within the context of national air quality standards and objectives.

As a partner of the Low Emissions Towns and Cities programme (LETCP), the Council is working together with its West Midlands neighbours to improve air quality and reduce emissions from road transport. This is alongside the emerging 'West Midlands Metropolitan Transport Emissions Framework' which sets out transport's role in tackling air quality issues and has proposed a range of policies. The intention is to do this by promoting the uptake of low emission fuels and technologies, establishing and sharing best practice policies, and developing various tools and resources. The objectives of the programme are to investigate and produce various regional strategies designed to improve air quality, with a view to meeting national air quality objectives.

Funded through the DEFRA Air Quality Grant, the aims of the LETCP and West Midlands Transport Emissions Framework are to:

- Improve air quality through the reductions in road transport emissions, and simultaneously reductions in carbon emissions;
- Establish best practice policies and measures for the West Midlands, creating transferable models for other towns and cities;
- Improve health; and
- Maximise opportunities for economic development through the transition to a green economy

## Policy EM7 Air Quality

1. Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development will be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality and be in accordance with the West Midlands Transport Emissions Framework and associated policies.



2. Major Development proposals will require the submission of an air quality assessment, as they may lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address:
  - a. The existing background levels of air quality;
  - b. The cumulative background levels of air quality (related to the cumulative impact of developments in an area);
  - c. The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of the air quality deterioration.
3. A Supplementary Planning Document will be developed to support this Policy.

To support the improvement in the city's air quality this policy should be applied in conjunction with the Low Emissions Strategy and Good Practice Guidance on Planning and Procurement for the West Midlands (2014) developed by the LETCP. All major developments will therefore be required to undertake full air quality assessments. Where appropriate exposure assessments will also apply to smaller developments in accordance with this guidance.

Exposure assessments will need to include an understanding of potential exposure to pollutants, as well as a proposal for mitigation measures such as:

- designing buildings to ensure local people are less exposed;
- green areas are incorporated into development to help create barriers to pollutants;
- that building layout and design prevents the creation of wind tunnels and canyons to help the dispersal of pollutants.
- This policy should be applied in conjunction with the Low Emissions Strategy and Good Practice Guidance on Planning and Procurement for the West Midlands.

Specific attention should be paid to location of sensitive developments, e.g. schools, hospitals, residential areas.

Detailed methodology for full air quality and exposure assessments should however be agreed with the Council. Mitigation and compensation measures, ensuring that all developments are sustainable from an air quality perspective, should be submitted with all proposals. Where appropriate, such measures may be secured through a legal agreement. Recommended measures for all types of developments can be found in the LETCP Air Quality Planning Guidance.

## Minerals and Waste

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### Introduction

**The Council recognises the importance of sustainable waste management both locally and in co-operation with its neighbours to ensure that all the waste management needs of the area are met. The key challenges for future growth in waste will be balancing economic prosperity and associated growth with the financial strains of providing necessary infrastructure.**

### Waste Management

The predominant residual municipal solid waste (MSW) treatment method within Coventry is incineration within an Energy from Waste (EfW) facility. Around 92% of residual MSW is sent to the existing EfW plant, with the remainder going direct to landfill. The EfW plant operates by burning residual municipal waste,

under controlled conditions, and utilising the heat from the combustion to raise steam. This steam is then used to generate electricity using two turbines and to provide heat to Coventry's district energy network (Heatline). The heat is transported using a network of underground pipes to heat eight major buildings in the city centre including the Council House, the Cathedral, the Herbert Art Gallery and Museum, and the Sports Centre. Buildings within the new business district at Friargate will also be served by Heatline for their heating and cooling needs.

The EfW plant is operated by Coventry and Solihull Waste Disposal Company, an 'arm's length' company jointly owned by Coventry, Solihull and Warwickshire Councils. The development proposed by the Plan will inevitably lead to a rise in all waste production. Residual municipal waste will continue to be delivered to the EfW plant at the same proportion (i.e. 92% of total tonnage). However, it is also recognised that recycling levels will also need to be maintained and increased throughout the Plan period in line with the Council's Waste Management Strategy.

The challenge to Coventry will be building upon existing recycling and composting arrangements, and raising the city's ambitions to become amongst the highest recycling cities in the UK. By doing this we will ensure that we meet the recycling targets set out in the national waste strategy and deliver the associated climate change and other environmental benefits of conserving raw materials and energy for the people of Coventry. Coventry's Municipal Waste Strategy 2008-2020 has outlined the city's ambition to achieve a 50% recycling rate by 2019/20.

The NPPF requires each community to take responsibility for their own waste and to adopt the principles of the waste hierarchy – prevent, reduce, reuse, recycle / compost, recover and then finally disposal. Coventry will require a sufficient number of waste treatment centres to cater for its needs. Where this involves newer methods of waste treatment, this can often take place in completely enclosed, controlled environments and does not constitute bad neighbour uses. Facilities at the EfW plant will also be expanded to support the management of the city's waste and generate heat and power for local homes and business.

Existing waste treatment facilities, however, have often been located in older industrial areas. As these areas continue to regenerate, the existing uses may not be considered compatible with new, or expansions to existing waste management facilities. In this context, and in order to ensure Coventry's waste treatment needs are met, existing waste treatment facilities will either need to be improved where necessary and safeguarded.

## Policy EM8 Waste Management

1. The Council's Waste Management Strategy will be supported through:
  - a. encouraging less consumption of raw materials through the reduction and re-use of waste products;
  - b. a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles;
  - c. encouragement of new methods of processing and recycling at waste management sites;
  - d. supporting recycling proposals for aggregate materials subject to the criteria in part 2 of this policy;
  - e. Existing waste management facilities or land allocated for waste management uses being protected from encroachment by incompatible land uses that are more sensitive to odour, noise, dust and pest impacts; and
  - f. Proposals for waste management facilities only being permitted where they would not have an unacceptable impact on the quantity or quality of surface or groundwater resources.
2. Proposed new or expanded waste management facilities will be assessed against the following criteria:
  - a. The effect of the proposed waste facility upon the environment and neighbouring land uses;

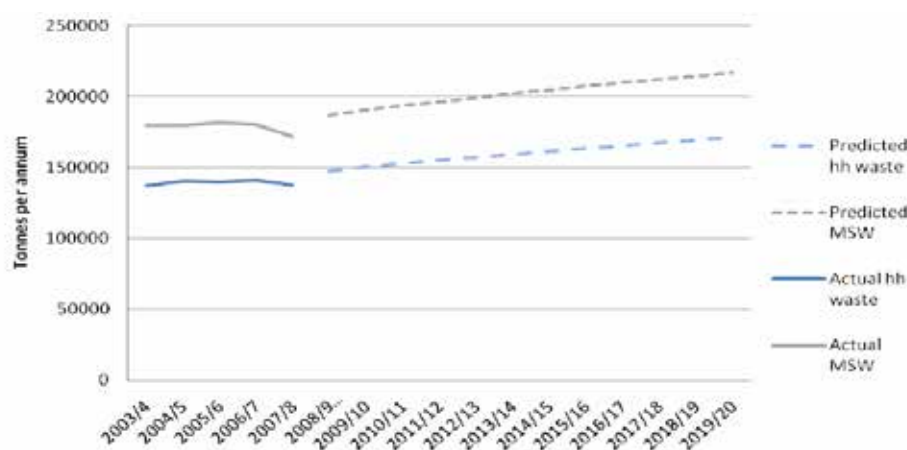
- b.** The impact of traffic generated by the proposal and the availability of alternative transit modes, such as rail and waterways;
  - c.** The need for pollution control measures appropriate to the type of waste to be processed or handled;
  - d.** The impact of proposals on residential amenity. New waste facilities will not normally be approved adjacent to existing housing and proposals for anaerobic digestion will not be approved in close proximity to existing housing;
  - e.** The effect of proposals on aircraft safety; and
  - f.** The design of the proposal. Careful consideration should be given to the need to minimise environmental and visual impact. Wherever feasible, waste operations should be enclosed within buildings or sealed structures in order to minimise impacts on adjacent uses from noise, ordure, vermin and wildlife. Proposals advocating open air unenclosed storage of organic odour producing material will not be supported.
- 3.** Proposals will be supported where it is demonstrated that these criteria are satisfied.
  - 4.** Development proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting.

Residual waste treatment capacity operational or in construction in the West Midlands is currently at 1.3 million tonnes per annum. Allocations for waste management sites and areas suitable for new or enhanced waste management facilities will be assessed against the criteria in this Policy.

The Council adopted its Municipal Waste Strategy 2008-2020 in 2009 in response to the Environmental Protection Act (EPA) and Waste (England and Wales) Regulation 2011 and associated national policy. The strategy outlines the Councils commitment to reducing both the quantity of waste, and to increase waste minimisation and reuse of unwanted goods, recycle and compost more waste, with the least amount of waste being sent to landfill as possible. This will be achieved through the development and support of proactive education, engagement, enforcement, higher levels of waste prevention, reuse, recycling and composting consistent with national standards of good practice for an urban environment.

Coventry is one of the highest performing authorities for diversion of municipal waste away from landfill. During the year 2014/15 the Council sent 8.3% of municipal waste to landfill, the proportion of this waste purely from household sources was 3%. Of the remaining household waste, 34.1% was recycled and 60.84% was used to generate electricity at the Energy from Waste Plant.

**Figure 11.1:** Actual and projected growth of households and municipal waste (MSW) in Coventry

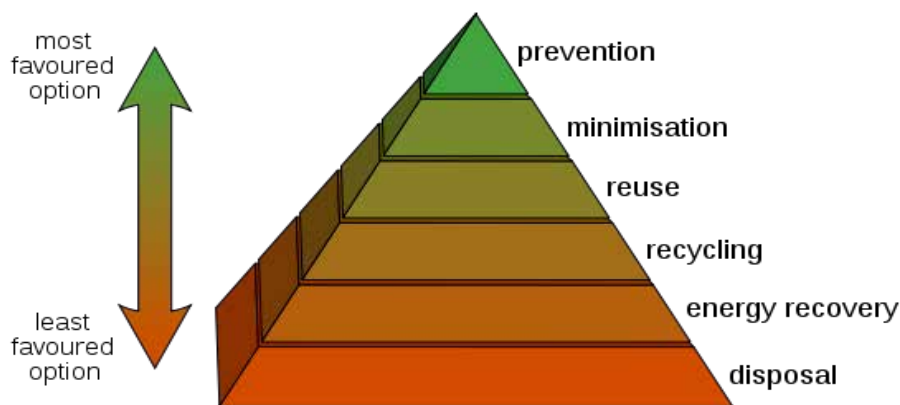


Source: Coventry Waste Strategy, 2008-2020

The estimates from the data show a fall in arisings as shown by figure 11.1. As demonstrated through this Plan, there is a significant planned increase in housing provision and the associated increase in population up to 2031. Future growth in prosperity and dwellings within the city will see a growth in overall waste produced in Coventry.

Therefore it is important to recognise the significance of effective waste prevention to provide a safe, clean and green environment where people will want to live and invest. Supporting residents to minimise the amount of waste produced, maximising reuse, recycling and recovery of energy from the remaining waste, to reduce the impact on the environment and encourage more sustainable use of resources for the benefit of all.

**Figure 11.2:** The Waste Hierarchy



## Existing Waste Management Facilities

The urban nature of Coventry and the absence of active quarrying activity means there is no opportunity for existing or future development landfill capacity in the city. Therefore, the city will continue to rely upon landfill capacity in surrounding authorities for the life of the plan period to manage wastes that cannot be reduced, re-used, recycled, composted or recovered. Whilst the total volume of waste landfilled is likely to fall over the life of this plan it should be considered that an increasing percentage of waste that is landfilled will be classed as hazardous waste, e.g. asbestos.

However, Coventry hosts a number of other waste management facilities for the treatment of both commercial and municipal wastes, including:

- 1 x Energy from Waste facility, Bar Road
- 1 x Civic Amenity Site at Bar Road;
- 1 x municipal waste transfer station at Whitley Depot London Road;
- a number of metal treatment / recycling facilities; and
- Numerous privately operated Waste Transfer, Bulking, and Material Sorting facilities – (used by Coventry, neighbouring authorities, and private businesses).

## New Waste Management Facilities

The Council will support the distribution of new waste facilities across the city providing the sites and facilities meet the specified criteria in Policy EM8. Where proposals for waste facilities can demonstrate they are sustainably located and meet waste management requirements and fulfil a need they will be supported. Modern well-run waste management facilities may present no more noise or loss of amenity than a typical industrial use and are essential to managing waste in a sustainable and efficient way.

Industrial areas with existing and complementary waste and industrial uses are well placed to specialise in new waste and sustainable energy technologies. There is an opportunity for the development of such technologies at the Bar Road facility which has potential to cluster complementary waste and sustainable energy uses. The Council will actively encourage and promote appropriate recycling and CHP energy generation schemes.

The Jobs and Economy section of this Local Plan makes provisions for a minimum reservoir of 58ha of employment land to be available at all times. This can include proposals for the management and treatment of waste and should ensure that there is a constant supply of suitable sites for waste-related uses. Coventry recognises that the future sustainable management of waste is an area of growth and has significant potential for job creation. To support the implementation of both the city's Climate Change and Waste Management Strategies, Coventry would support the development of facilities that recycle and recover value from waste. In particular, facilities that are developed along with supporting infrastructure that make use of the materials recovered through the waste management process in specific localities that reduce transport journeys will be encouraged. For example, a Materials Recycling Facility (MRF) that is co-located with a paper mill or plastic manufacturer along with an Anaerobic Digestion facility that powers and heats the other buildings to develop an eco-park.

## Safeguarding Mineral Resources

The continued supply of aggregates and other material, including recycled and secondary materials is required to meet current and future needs of the development and construction industry. Promoting the use of recycled and secondary materials will help to minimise both primary extraction and waste and so is reflected in Policy EM8.

The National Planning Policy Framework requires local planning authorities to define Mineral Safeguarding Areas (or MSAs for short) in Local Plans in order that proven mineral resources are not needlessly sterilised by non-mineral development, although there is no presumption that resources defined in MSAs will be worked.

MSAs are required to identify what are considered to be economic deposits of mineral. The purpose of MSAs is to ensure that mineral resources are adequately taken into account in all spatial planning decisions. They do not automatically preclude other forms of development taking place, but highlight the presence of economic minerals so that it is considered, and not unknowingly or needlessly sterilised.

In areas where extraction is permitted or is planned, Mineral Consultation Areas will be designated. None are proposed for Coventry during this plan period as there are no anticipated active mineral sites that are being brought forward during the plan period. This has been evidenced through the British Geological Society's Mineral Safeguarding Project, which has been undertaken for the Coventry, Solihull and Warwickshire authorities.

### Policy EM9 Safeguarding Mineral Resources

1. Mineral Safeguarding Areas are defined for mineral reserves that are considered to be of current or future economic importance. Where developments are proposed in these areas, the application needs to acknowledge the presence of these mineral reserves. The extent of Mineral Safeguarding Areas are defined on the Policies Map.

In Coventry, the predominant economic mineral resource is coal. MSAs for this mineral have been identified having had regard to advice in the 'Guide for Mineral Safeguarding in England' produced by the British Geological Society (BGS) in November 2007. The former coal mining site at Daw Mill (which lies outside Coventry's boundaries) previously had a direct impact on the extensive concealed coal reserves that extend across the southern coalfield. These areas lie in the north western areas of Coventry's administrative boundary. Following the closure of the site however, the mining of this area is now highly unlikely.

Local authorities are required to prepare a Local Aggregate Assessment (LAA) to assess the capacity and outputs from existing sources, and to assess future supply options. The 2015 draft LAA has been prepared collaboratively by the seven West Midlands Metropolitan Authorities in order to address cross boundary mineral planning issues. The Council will continue to proactively work with its neighbours through joint working and collaborative efforts via the West Midlands Aggregate Working Party.

The draft report identifies that the requirement from the West Midlands Sub-national apportionments were last undertaken in 2009. They suggested that 165 million tonnes of sand and gravel were required over the 16 year period from 2005 to 2020 along with 82 tonnes of crushed rock. The most recent (2011) annual apportionment to the West Midlands Metropolitan Area is for the production of 0.55 million tonnes of sand and gravel per year. There is no crushed rock apportionment. These apportionments have informed the most recent guidelines for the purposes of minerals planning in the area and are reflected in the Solihull Local Plan which, notwithstanding the legal challenge to its housing policies, was adopted in December 2013. This sets out a requirement for 7.5 million tonnes of sand and gravel production over the plan period.

## **Policy EM10 Non Mineral Development in Mineral Safeguarding Areas**

All non-mineral development proposals in the designated Mineral Safeguarding Areas should assess and evaluate the legacy of past mining heritage and should consider this in accordance with Policy EM2. It should also ensure that development does not entirely sterilise any potential future mineral extraction should this become viable and desirable. This should be considered in partnership with the Coal Authority.

The policy aims to take a balanced approach to protecting minerals resources in Coventry against the need to attract investment and urban regeneration to a primarily built up area.

This policy ensures that all proposals for non-mineral working within the designated MSAs are properly considered and evaluated in partnership with the Coal Authority. The Policy also aims to ensure that development proposals within the Plan are deliverable without complete sterilisation due primarily to the extensive deep cast coal reserves to the West and North West of the city. Within this location this has been further emphasised by the closure, and planned redevelopment of the Daw Mill Colliery, which would have provided the primary access point for the extraction of such reserves. Development identified within policies H2 and/or JE2 would not therefore be subject to this policy.

## 12. Connectivity – Telecommunications, Broadband and Mobile Internet

### Relevant Evidence Base

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- BDUK Broadband Delivery Project - Local Broadband Plan: Coventry, Solihull & Warwickshire Superfast Broadband (2011-2015)
- Coventry Broadband Coverage Map
- West Midlands Strategic Infrastructure Advice Paper (PBA) 2015

### Introduction

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**The Government is committed to securing a world-class communication system. The importance of facilitating this through the Local Plans is identified within the NPPF (para 43) as well as the Digital Communications Infrastructure Strategy and the Digital Agenda for Europe. Currently, one of the main barriers to this is the availability of super-fast and ultrafast broadband<sup>10</sup>, especially in more rural areas and within new developments, in particular those on previously undeveloped land.**

The NPPF recognises the role of advanced, high quality communications infrastructure in creating sustainable economic growth. The development of high speed broadband technology and other communications networks will also play a vital role in enhancing the provision of local community facilities and services.

Communication infrastructure includes telephone systems (both wired and mobile) and broadband. The benefits of having a modern and accessible system of telecommunications, wireless and electronic methods of communication across Coventry and its surrounding area will be significant both in terms of economic growth, inward investment and sustainable living environments. As such, the city aspires to be a superfast broadband city and wherever possible will look to invest directly in projects to help deliver this aspiration. This is also recognised within the Council's IDP and forms the basis for policy C1.

### Broadband Connectivity

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A digitally accessible city will allow people enhanced freedom of choice about where and how they work, how they interact with services and facilities and how they promote and operate their businesses. It will also support the city centre and its role within Coventry's electric city initiatives and its position as a Gigabyte City. A connected community is a more sustainable one, as it represents the opportunity for a reduction in car-based commuting and a commensurate reduction in carbon outputs and traffic congestion. It also promotes Coventry as a suitable place for high technology activities and employment to take place, especially in accordance with the growth and continued success of the city's two universities.

At this time however there is no legal requirement to provide such facilities as standard, although recent proposed changes to Building Regulations could change this position. Despite the nationwide installation programmes of major suppliers there is a genuine risk that gaps will continue to remain within the market, especially within new developments that grow and expand the existing urban area. Indeed the Council is aware of recent developments across Coventry where superfast broadband has not been installed from the outset and as a result is incurring greater cost and disruption to introduce retrospectively compared to inclusion alongside wider utilities provision or highway construction at the outset of development.

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<sup>10</sup> Superfast broadband is defined as delivering speeds of 25mbps+, whilst ultrafast broadband is equivalent to 100mbps+



In 2015, Peter Brett Associates undertook an overview of Strategic Infrastructure on behalf of the Metropolitan Authorities. This included a section on telecommunications infrastructure and highlighted the importance of incorporating such provisions at the initial development stage. It also highlighted that within predominantly urban areas where existing networks can be connected and enhanced the cost of delivering such provisions is highly unlikely to have an impact on development viability when delivered from the outset in partnership with a specific provider.

To support the delivery of superfast broadband across Coventry, the Council has a strong track record in procuring and implementing advanced wide area network services, working closely with both JANET(UK) and the Cabinet Office in relation to the Public Services Network (PSN) programme.

The Council is also a member of the CSW Broadband Project, which has been supporting the delivery of broadband upgrades across Coventry and Warwickshire since 2011 and which aims to upgrade existing infrastructure to deliver the government and European connectivity targets. The project is supported by the Coventry & Warwickshire and Greater Birmingham & Solihull LEPs.

The project mapping developed by the CSW Broadband Project highlights a range of areas that continue to lack super-fast broadband connections across the city. These locations are predominantly situated around the edges of the city, including the largely undeveloped or low developed areas to the North West corner of the city. There are other notable locations though, especially around the current regeneration areas in Lower Stoke and Canley as well as parts of the city centre. This highlights the importance of continuing to promote the benefits of super-fast broadband and the principles of the CSW project throughout the plan period as part of new developments as and when they happen. This will not only support the viability of such infrastructure but will also support urban regeneration and sustainable development principles.

In addition to Broadband connectivity, the provisions of mobile internet services are becoming increasingly important. The CSW Broadband Project identified that Coventry has 100% coverage of 3G capabilities; however there is an on-going roll-out of 4G technologies, which will seek to maximise provisions and access across the city.

## Policy C1: Broadband and Mobile Internet

1. Developers of new developments (residential, employment and commercial) will be expected to facilitate and contribute towards the provision of broadband infrastructure suitable to enable the delivery of broadband services across Coventry to ensure that the appropriate service is available to those who need it.
2. Developers must make sure that broadband services that meet the ambitions of the Digital Communications Infrastructure Strategy and the European Digital Agenda are available, wherever practicable, to all residents of the development at market prices and with a full choice of all UK service providers.
3. Developers are required to work with a recognised network carrier to design a bespoke duct network, for the development.
4. Other forms of infrastructure, such as facilities supporting mobile broadband and Wi-Fi, should be included, wherever possible and viable and should be designed in a sympathetic and appropriate way in order to reflect the character of the surrounding area.

Key to this plan is ensuring that new developments deliver broadband services that meet the ambition of the governments Digital Communication Strategy and the European Digital agenda. Notable targets of these strategies are:

#### **The digital communications infrastructure strategy:**

- By 2017, superfast coverage will have reached 95% of premises, and we expect mobile operators to have achieved 4G coverage to 98%.
- The ambition that ultrafast broadband of at least 100Mbps should become available to nearly all UK premises.

#### **Digital Agenda for Europe:**

- Download rates of 30 Mbps for all of its citizens and at least 50% of European households subscribing to internet connections above 100 Mbps by 2020.

Through this Local Plan the Council will adopt these targets for Coventry. In relation to the ambition for ultra-fast broadband, the Digital Communications Infrastructure Strategy did not set a timeframe for achieving this target. In adopting this for Coventry, the Council will therefore aim to support the delivery of ultrafast broadband to 95% of all homes across the city by 2021 and 100% by the end of this plan period. Any opportunity to accelerate or increase connectivity across Coventry however will be supported.

In relation to point 4 of Policy C1, specific regard should be given to the delivery of new infrastructure to support mobile internet within Conservation Areas or on/adjacent to heritage assets. Such infrastructure should not be intrusive and should not have a negative impact on the character, integrity or setting of such assets and/or areas.

In terms of actual connections and intended providers, applicants should engage with network providers from the outset to ensure the needs of the service (including new ducting) can be introduced alongside other on site infrastructure works as part of new developments to ensure the most efficient and viable approach is taken to securing connectivity.

This approach should be clearly identified within the Planning Statement that supports a relevant planning application and should outline who the intended network provider(s) will be and how the connection will be secured to each property. Every opportunity to future proof broadband provision and infrastructure should also be taken. This should ensure that ducting can be utilised to support ever increasing broadband speeds and caballing with minimum disruption to the highway network.

## **Telecommunications**

In terms of general telephone communications, there is a legal requirement that copper wire telephone services are provided to all new developments. It is therefore assumed that there will be no issue with the provision of telephone services to new development.

### **Policy C2: Telecommunications**

1. When considering notifications, planning applications and prior approval applications, regard will be given to the following factors:
  - a. a) operational requirements of the telecommunication networks and the technical limitations of the technology, including any technical constraints on the location of telecommunications apparatus;
  - b. b) the need for the ICNIRP Guidelines (and any other relevant guidance in place at the time of the application) for safe emissions to be met;
  - c. c) the potential for sharing existing masts, buildings and other structures;

- d. the impact of the development on its surroundings with particular regard to the following criteria:
  - i. the visual amenity, character or appearance of the surrounding area.
  - ii. apparatus and associated structures sited on a building should be sited and designed in order to seek to minimise impact to the external appearance of the host building.
  - iii. development should not have an unacceptable effect on conservation areas or buildings of architectural or historic interest or areas of ecological interest or areas of landscape value or sites of archaeological importance.
  - iv. iv. the proposed provision of landscaping.
2. Telecommunications equipment that has become obsolete or that is no longer in use should be removed as soon as practicable and the site restored to its former condition.

Detailed evidence and justification for any new site should accompany any application made to the local planning authority. To support this, the Council will update its existing Telecommunications SPG.

## 13. Infrastructure Delivery, Implementation and Monitoring

### Introduction

**The Local Plan sets out how the city will develop over the period to 2031, identifying where homes, jobs, services and infrastructure will be delivered and the type of places and environments that will be created.**

Having set out a clear direction for how the city will develop, and the planning policies and proposals that will help achieve this, it will be important that there are tools in place to help implement these and ensure the successful delivery of the overall vision for Coventry.

This chapter identifies the processes by which the infrastructure necessary to support the level of planned development within the city would be secured and delivered. It links to other Local Plan policies and supporting text to identify key strategic infrastructure as well as summarising broad requirements throughout the city.

### Delivery of infrastructure

#### Partners

The delivery of infrastructure to support the growth identified in the Local Plan will require a partnership approach. As a Local Authority, Coventry City Council has a number of responsibilities and obligations it has to meet and therefore has a pivotal role as an infrastructure and service provider. The roles the Council currently fulfils include:

- Local Planning Authority
- Local Highway Authority
- Local Education Authority
- Waste and Minerals Authority
- Strategic Housing Authority
- Social Care Service Provider
- Lead Local Flood Authority
- Public Health

The Council has an important role to play in setting the level of and securing developer contributions, including CIL, to deliver the necessary infrastructure to support development. In line with its role and responsibilities, the Council will have a lead role in coordinating and delivering infrastructure in Coventry to support growth. The Council will work closely and in partnership with a number of organisations across both the public and private sector to achieve this. As a major landowner within Coventry, the Council will play a leading role in bringing sites forward for development.

There are close links between Coventry and the rest of the West Midlands and Warwickshire. This includes both Local Authorities, Local Enterprise Partnerships and the West Midlands Combined Authority, and on-going discussions have taken place on a number of key issues, including housing and economic growth. The Council will work with these neighbouring authorities and organisations to ensure that cross boundary infrastructure issues are addressed to help deliver growth and development in the area.

Organisations in the public sector as well as other agencies are also responsible for meeting their statutory obligations and responding to growth.

The Council will continue to work closely with these agencies to maximise funding opportunities and to identify the most effective and timely delivery mechanisms for the necessary infrastructure.

## Definition of Infrastructure

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The Planning Act 2008 provides a wide definition of the infrastructure which can be funded by the CIL and other sources. This definition allows the CIL to be used to fund a broad range of facilities and can be grouped under 3 specific categories:

- Physical infrastructure covers: transportation networks (roads, public transport, footpaths and cycle ways); water; drainage; flood prevention; and utility services such as electricity, gas and telecommunications.
- Social infrastructure covers: education (primary, secondary, higher and special needs); health facilities (hospitals and primary care providers); social services; emergency services (police fire and ambulance); and other community facilities, such as indoor sports, cultural facilities, libraries, cemeteries and community halls
- Green infrastructure covers: parks; allotments; footpaths; cycle paths; natural spaces; sports and cultural facilities; and play areas

This list of specific infrastructure has been developed through a robust and credible evidence base, joint working and focused consultation. The list should not be considered exhaustive and will be monitored on an annual basis, to highlight any changes to needs within the city that require attention and investment.

## Infrastructure Requirements

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The Local Plan has been developed alongside continued consultation with the bodies responsible for infrastructure delivery in order to ensure that required infrastructure will be delivered in a timely manner where appropriate. The views of these bodies have been used in testing and underpinning the strategy, although there remain some areas, which will require on-going consultation with the responsible bodies and agencies to identify future, unforeseen needs. This reflects the on-going importance of continuous engagement and monitoring to ensure the Plan is kept up to date and fit for purpose.

A key aspect of this policy will be the Infrastructure Delivery Plan (IDP). This will set out what infrastructure is required, when it is required, how much it will cost and what part of the overall cost will require contributions from development. It is important that this is kept up to date along with the evidence base that informs the IDP. The following areas of infrastructure will be considered through the IDP:

- Highways and public transport;
  - Cycling and walking routes
  - Water supply and sewage treatment;
  - Flood risk and drainage;
  - Utilities and energy supply;
  - Fuel poverty and energy efficiency;
  - Health provisions;
  - Community facilities;
  - Education;
  - Sports facilities;
  - Green infrastructure;
  - Emergency services;
  - Waste treatment and management; and
  - City centre infrastructure including public realm and accessibility.

In addition, the City's IDP will be managed to reflect strategic cross boundary infrastructure that is to be delivered within Warwickshire but with a view to supporting the growth of the City (in part at least) and the delivery of the homes and employment land that have been redistributed through the Housing and Employment MoU's. This reflects the strategic importance of such infrastructure and the Councils on-going commitment to its Duty to Cooperate responsibilities with its neighbouring authorities.

## Policy IM1: Developer Contributions for Infrastructure

1. Development will be expected to provide, or contribute towards provision of:
  - a. Measures to directly mitigate its impact and make it acceptable in planning terms;
  - b. Physical, social and green infrastructure to support the needs associated with the development
2. Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Plan.
3. The Council will, where appropriate, seek to secure site-specific infrastructure investments and/or contributions as well as off-site contributions and/or investments. The nature and scale of these will be related to the form of development and its potential impact on the site and surrounding area. The cumulative impact of developments will also be taken into account.
4. Developer contributions in the form of Planning Obligations and/or Community Infrastructure Levy (CIL) will contribute towards strategic infrastructure required to support the overall development in the Plan. This will focus primarily on category 1 infrastructure as identified in the IDP and/or Regulation 123 list.
5. Where site specific issues generate viability concerns, applicants should discuss these with the Council at the earliest possible stage in the development process. Proposals that are unable to comply with the Plan's policies on viability grounds must be accompanied by a detailed Viability Assessment.
6. The Council will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan to ensure an up to date evidence base regarding infrastructure requirements and costs is maintained.

The NPPF requires that careful attention is given to viability and costs of development. For plans to be deliverable, development must be viable and should not therefore be subject to obligations and policy burdens that undermine viability. Development should provide competitive returns to a willing landowner and willing developer.

The Council has developed viability evidence to support its Local Plan, having regard to affordable housing and development standards. The viability assessment work will be developed further through the Council's Community Infrastructure Levy Charging Schedule.

The work to date suggests that as a whole, the Plan's proposals are viable and, in the main development proposals should be able to comply with the policies of the Plan and contribute to the costs of infrastructure through CIL and Section 106 contributions without threatening viability.

However, there may be specific circumstances which mean the planning obligations and policies make a development, which otherwise positively contributes to the delivery of the Local Plan, unviable. In these cases, applicants will be expected to demonstrate how planning obligations and policies result in the development being unviable by preparing a Viability Assessment. The Viability Assessment should be undertaken in accordance with the RICS Guidance Note on "Financial Viability in Planning" or any updates of this guidance. The Viability Assessment will be reviewed by the Council, however where conflicting views remain an independent viability specialist may be appointed by the Council at the applicant's expense in order to reach an agreed position.

## Implementation

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In implementing the policies and proposals within the Local Plan it is recognised that the private sector will have a key role to play in both the funding and delivery of development. Equally, the Council will have an important role to play and will make use of all appropriate mechanisms including:

- Use of Government grants, European funding and prudential borrowing;
- Working in partnership with other statutory delivery agencies (e.g. the WMCA, the Environment Agency, the Homes and Communities Agency, Sport England, and utility Companies) to ensure that essential infrastructure is provided;
- Working in partnership with landowners/developers and other private sector organisations including Business Improvement Districts to secure deliverable development proposals and investment;
- Engaging with education providers and other organisations to support skills and training initiatives;
- Preparation of Local Development Orders (LDOs), Area Action Plans (AAPs) and Supplementary Planning Documents (SPDs) and other more detailed frameworks to provide context and support for site specific delivery;
- Application of the Development Management and other regulatory functions;
- Use of the Council's Compulsory Purchase powers to assist with site assembly;
- Use of Section 106 agreements to secure affordable housing and other benefits;
- Support for Neighbourhood Planning and other local initiatives;
- Use of tariff-based systems such as the Community Infrastructure Levy for infrastructure delivery where appropriate;
- Use of other funding sources such as the landfill tax, the aggregates levy, the lottery fund, development incentives and other initiatives as they arise; and
- Where appropriate pro-active use of the Council's land holdings to assist delivery.

Over the lifetime of the plan it is likely that new initiatives, partnerships and sources of funding will emerge that will play a new role in helping to implement proposals and deliver growth. Some of the specific mechanisms that are currently and will continue to play a key role in the short to medium term are identified below.

National Guidance does however place greater certainty on short term infrastructure needs in order to ensure development can be supported in a sustainable way from the outset of the plan. The Council's current 5 year housing land supply comprises 75% of homes which already have planning consent or have started construction (at April 2016). In addition, a further 15% is covered by sites allocated under policy H2, adding further certainty to the delivery of these schemes and their supporting infrastructure. The remaining 10% comprises sites within the SHLAA that are predominantly smaller sites within the existing urban area and which will have a lesser impact on infrastructure needs, with greater opportunity to access and utilise existing provisions.

In terms of employment land, the works currently on-going at Toll Bar Island have supported the access to Whitley Business Park, whilst land at Browns Lane, Friargate and Sutton Stop have extant planning permissions meaning infrastructure considerations have already been taken into account. Alongside the remaining land at Ansty Park and Ryton the Council is clearly able to demonstrate a deliverable reservoir of employment land supported by achievable infrastructure programmes.

## Local and National Grant Funding

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One of the key aspects for the successful delivery of the Local Plan will be the provision of infrastructure to enable and support development. There are a range of funding options that can be utilised to support the infrastructure and environmental improvements that are required to enable the delivery of the overall strategy and support sustainable growth.

To support the delivery of Infrastructure across Coventry the Council have been proactive, efficient and successful at drawing down significant levels of grant funding from a variety of sources including:

- The European Regional Development Fund (ERDF);
- The Regional Growth Fund (RGF);
- Growth Deal and City Deal;
- Strategic Economic Plan funding streams;
- Other Local Enterprise Funding;
- Heritage Lottery Fund; and
- Department for Education Capital Grant funding.

Such funding has helped deliver infrastructure projects that have and continue to unlock growth across the city. In the last 3 years grant funding has delivered in excess of £64m, with a further £73m committed and secured to fund schemes over the next 5 years. These funds contribute towards a total grant funding pot of in excess of £224m that will support infrastructure delivery across Coventry over the course of the plan period. These funds have successfully delivered schemes such as:

- NUCKLE rail upgrades;
- Far Gosford Street regeneration;
- Transport Museum expansion;
- Redesign of Whitley Junction;
- School expansions and refurbishments e.g. Edgewick, Little Heath, Whitley Abbey, Corpus Christi and Hollyfast Schools;
- Commencement of Friargate;
- Redevelopment of the Ring Road Junction 6;
- Cycling initiatives across the city;
- Highway upgrades at the A4600; and



- Enhancements to public green spaces and play areas e.g. Canley, Primrose Hill and War Memorial Park.

The Council recognises that grant funding is likely to change significantly over the course of the plan period, with different sources and amounts of funding becoming available. The Council does however have a proven track record and substantial experience in both securing and spending grant funding in order to support improvements to the city's infrastructure. Indeed, the Council are already progressing plans to invest money secured through the Devolution Deal as part of the West Midlands Combined Authority, including significant contributions towards rail and highway infrastructure. As such, grant funding is expected to continue to contribute towards delivering the infrastructure needs of this Plan. Where possible and appropriate opportunities to 'match fund' grant funding alongside other funding streams such as developer contributions or council budgets will be supported to ensure the sustainable delivery of infrastructure.

## Developer Contributions

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Development will be expected to provide, or contribute towards the provision of:

- Measures to directly mitigate its impact and make it acceptable in planning terms
- Physical, social and green infrastructure to support the needs associated with the development.

These contributions will be sought in line with the CIL regulations and appropriate 'tests' or successor regulations/guidance. The Council will, where appropriate, seek to secure site specific measures through planning obligations. The nature and scale of any planning obligations sought will be related to the form of development and its potential impact on the site and surrounding area. Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Local Plan, and will ensure any new developments will provide the infrastructure, facilities, amenities and other planning benefits which are necessary to support and serve the development, and to offset any consequential planning loss to the local area which may result from the development. Developer contributions in the form of the CIL will contribute towards strategic infrastructure to support the overall development in the Plan.

## Planning Obligations and Community Infrastructure Levy (CIL)

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Section 106 agreements will continue to be used to secure affordable housing and on site infrastructure, ensure the development or use of land occurs in specific ways; and requires specified operations or activities to be carried out.

As of June 2016, the Council had secured in excess of £6m in developer contributions to support the sustainable delivery of sites already with planning permission or currently being developed. This includes money for new school places, new play areas, highway improvements and general maintenance of parks and green spaces. In addition to this money current developer contributions have secured land set aside for education provision and parks and green spaces.

The CIL came into force nationally in April 2010 and allows local authorities to raise funds from developers undertaking new building projects in their area. The CIL is a set levy based upon the type of use and floor space proposed and provides a standardised method for calculating contributions. The Council expects to adopt its own CIL in 2018.

## Inward investment

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Alongside securing funding for infrastructure the ability to attract private sector investment will be central to the overall success of the Local Plan. The Council will continue to take a proactive and constructive approach to potential investors. The Council will continue to work actively in promoting Coventry and the opportunities on offer. Indeed the Local Plan supports this approach by providing a degree of certainty over site allocations and proposals. Furthermore the city finds itself at the forefront of an upturn in the local and national economy and through this Local Plan and its supporting documents will be very well placed to respond to this upturn with a varied and flexible supply of developable land to facilitate inward investment.

## Partnership working

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While the Council has a key role to play in delivering the policies and proposals, responsibility does not rest solely with the Council and it will require the combined efforts and investment of a range of stakeholders working together.

The CWLEP will have a central role in supporting the delivery of the overall growth agenda for Coventry. They provide the vision, knowledge and strategic leadership required to drive sustainable private sector growth and job creation in their areas. The CWLEP was formed in 2011 and is a business led initiative with local authority, the business community and educational providers represented.

## Duty to Co-operate

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To support the alignment of sub-regional development and strategic infrastructure a Spatial Plan for Recovery and Growth is being progressed by the CWLEP, in partnership with the 6 local authorities and WCC. The County Council are also coordinating a compendium of infrastructure Plans across the sub-region to support the alignment of strategic growth areas and infrastructure provisions. This will be supported by the regular updating of the Council's live IDP which will identify key cross boundary schemes linked to the delivery of the city's unmet needs within Warwickshire. In addition a West Midlands Strategic Infrastructure Advice Note has been prepared to support the Combined Authority process and inform key infrastructure issues that need to be overcome to support the delivery of new homes and jobs. Both areas of work support the DtC process in so far as it relates to the delivery of strategic infrastructure.

## Use of Council powers

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The Council has a range of powers that are available to help support delivery. This will not just be confined to those of the planning system but also the housing, education and highway functions it provides.

## Compulsory Purchase Powers

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These are an important tool for local authorities and other public bodies to assemble land to help deliver social and economic change. The Council has a strong track record in utilising these powers to support urban regeneration schemes and the delivery of infrastructure and will continue to apply these powers where the acquisition of land is necessary to enable comprehensive schemes that deliver economic, social and environmental benefits.

## Use of Council Land

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The Council has extensive landholdings within Coventry and will seek to use these to take forward the strategy where appropriate and possible. This will include the promotion of land for development and through the protection and improvement of social and environmental assets.

## Wider Planning

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The preparation of more detailed plans to guide delivery in areas of change has proved to be successful in the past and will continue. Wherever possible the Council will aim to make use of Supplementary Planning Documents, Area Action Plans, Neighbourhood Development Plans and regeneration frameworks to provide local and site specific policy and promote a comprehensive approach to development initiatives. The Development Planning and Development Management roles of the Council will remain an important delivery mechanism.

## Monitoring

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The Council will measure the performance of the Coventry Local Plan by assessing how effective its policies are in delivering the vision and objectives.

The main mechanism for reporting on the performance of the Plan will be the Authorities' Annual Monitoring Report.

## Monitoring and Performance

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Appendix 8 of the Local Plan identifies a range of monitoring requirements linked to the policies of this Plan. These requirements will be assessed through the Council's Annual Monitoring Report process to test the delivery and performance of the Local Plan and Supporting Documents.

The Monitoring Framework has been appended to the Local Plan to reflect the fact that it is a 'living document'. Many of the Local Plan policies will require assessment over time to understand appropriate trends and impacts on development. This reflects the changing face of planning policy in recent years and the increasing need to consider the impacts of climate change and sustainable development in particular. Where trends become apparent through monitoring, this Framework will be updated through the Annual Monitoring Report process.

The Monitoring Framework will therefore be regularly reviewed and kept up to date. It will also be an integral evidence platform for determining the need to review the Plan, either in full or part, in accordance with Policy DS1.





# LOCAL PLAN

## Appendices

## Appendix 5 - Car and Cycle Parking Standards for New Development

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### 1. Introduction

- 1.1 This appendix sets out standards for levels of car and cycle parking associated with new development in Coventry. The standards include requirements for electric car charging points and the provision of parking for people with disabilities.
- 1.2 These standards should be applied in combination with the main policies set out in the Coventry Development Plan, and specifically policy Acc 3 which deals with car parking. The City Centre Area Action Plan also contains policies relating to the provision of public car parking in the city centre.

### Relevant Local and National Car Parking Policy

- 1.3 The National Planning Policy Framework (NPPF) (2012) sets out the Government's approach to car parking standards stating that in setting local standards, local planning authorities should take into account:
  - the accessibility of a site
  - the type and mix of the proposed development
  - the availability of and opportunities for public transport
  - local car ownership levels
  - an overall need to reduce the use of high-emission vehicles
- 1.4 In March 2015 the government provided additional detail on the NPPF parking policy which stated that, "Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network".
- 1.5 There is very clear evidence locally that the under provision of car parking can be attributed to road safety and congestion issues in numerous areas across the city. Most notably, inadequate levels of car parking have been shown to cause unacceptable levels of on-street parking causing obstructions to other road users including refuse and emergency vehicles. A review of the current parking situation is outlined in more detail below.
- 1.6 It has been determined that the provision of car parking standards is required locally to address those issues whilst also providing additional guidance to developers to help maintain appropriate and consistent levels of car parking across the city and with surrounding areas.

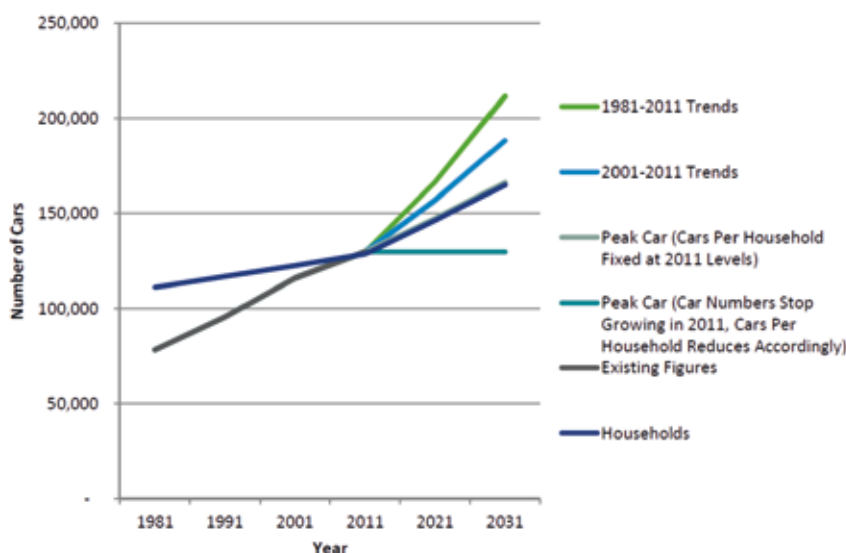
### Background

- 1.7 Coventry is a compact highly accessible city with a well-developed and maintained road network. The density, type and accessibility of housing varies greatly across the city, but typically Coventry is made up of large areas of terraced and semi-detached housing, in many cases with little or no off-street car parking. In more suburban lower density areas of the city, levels of car ownership levels are typically higher, but even with an increased availability of off-street parking, levels of on-street parking frequently remain high.
- 1.8 Patterns of commercial development over the past twenty years have seen an increase in out of town businesses and retail sites. In some cases there has been an overspill of car parking into local residential areas necessitating the introduction of residents parking zones. This overspill effect is also an issue in residential areas located around the periphery of the city centre. It is considered that the application of appropriate levels of car parking and the completion of a ring of residents parking zones around the edge of the city centre alongside a continued programme of promoting sustainable travel modes will help to address this.

- 1.9 The City Council has undertaken a review of current car parking issues to inform the formulation of these standards. The review considered:
- The existing parking situation in a variety of areas across the city in terms of on-street parking, and associated highway safety and traffic management issues
  - The effectiveness and impact of recent car parking provision on new development
  - Car parking standards adopted by other local authorities including those with comparable characteristics to Coventry and those in the locality
  - Other relevant planning and transportation policies related to car parking
  - Car ownership levels and usage levels in different parts of the city
  - The availability of public transport
- 1.10 The review has shown that the provision of inadequate levels of car parking, most notably in residential areas, has increased occurrences of inappropriate and obstructive informal on-street car parking. This indicates that restricting levels of car parking does not necessarily have a material impact on reducing levels of car ownership. The location and design of car parking also appears to have an impact on its usage and occurrences of on-street parking.
- 1.11 The increase in on-street parking has caused a variety of issues including:
- Blocked access routes for emergency, refuse and delivery vehicles
  - Blocked footways preventing access for pedestrians
  - Reduced visibility for all road users at junctions and for pedestrians crossing the road
  - Negative impacts from parking on the overall visual appearance of the street scene
- 1.12 Over recent years, the typical standard applied has been to restrict parking to two spaces per dwelling, not necessarily linked to the number of bedrooms. There is also evidence which indicates that a high proportion of garages, counted as part of the total parking provision, are frequently used for general storage rather than for parking vehicles.

### Accessibility and Car Ownership

- 1.13 The City Council continues to promote a number of positive initiatives to encourage an uptake in walking, cycling and public transport usage. There is also evidence that overall levels of vehicular mileage in the city have reduced slightly over recent years. Despite this, over the past 30 years levels of car ownership in Coventry have continued to increase. Projecting this forward, it is expected that this trend will continue in line with an increase in the number of households.





## Approach of these Standards

- 1.14 As outlined above, the availability of car parking can have a major impact on local traffic management and safety issues. It is therefore essential to try and get the balance right of ensuring that adequate levels are provided to manage inappropriate parking without providing excessive levels which dominate the built environment and overtly encourage car use.
- 1.15 The Local Plan includes policies setting out a balanced approach to supporting the movement needs of local residents and businesses in a growing city. Those policies recognise the role of the car in supporting connectivity to areas in and around Coventry, but also actively encourage sustainable and active modes of travel to help address traffic congestion, air quality and health issues.
- 1.16 The quality and accessibility of public transport, walking and cycling routes to key services can influence how people travel, for example, people living in or near the city centre are less likely to be reliant on car use, hence there will be a reduced need for car parking compared to less accessible areas of the city. The City Council is also exploring options for the introduction of car clubs, with a focus on the City centre, which support more efficient and flexible models of car ownership.
- 1.17 2011 census information clearly shows a wide variance in levels of car ownership in different parts of the city.

City centre	
0 cars or vans in household	69.1%
1 car or van in household	24.6%
2 cars or vans in household	5.2%
3 cars or vans in household	0.9%
4+ cars or vans in household	0.2%

Ward in the south of the city	
0 cars or vans in household	7.8%
1 car or van in household	35.3%
2 cars or vans in household	43.2%
3 cars or vans in household	10.2%
4+ cars or vans in household	3.5%

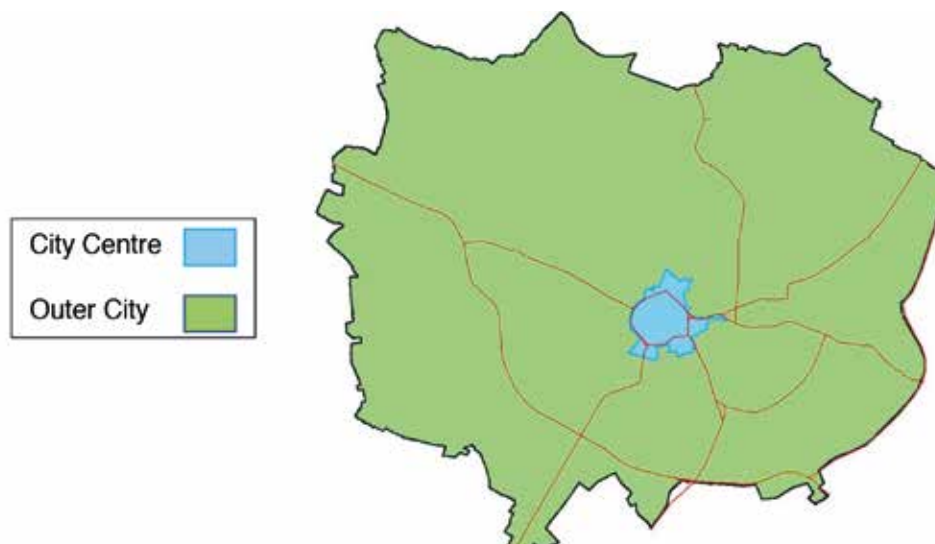
- 1.18 Recognising the variances in car ownership and accessibility across the city, the standards set out in this document are based on two distinct zones:

1) **City Centre** (all sites within the defined city centre)

The level of car parking permitted for applications within the City Centre will be determined on a site by site basis on the merits of the application and criteria in the NPPF, as set out in para 1.3 above.

2) **Outer City** (all other areas within the city boundary)

The level of car parking permitted for applications in the Outer City will be determined on the basis of the standards set out in table 1 below.





- 1.19 The car parking standards in this document should be considered as a maximum. However it is recognised that in exceptional circumstances there may be occasions when it could be appropriate to have a lower or higher level of parking depending on the specific details of the application. In all cases, any departures from the parking standards should be fully and appropriately justified with detailed supporting evidence. In most cases this should be included within the associated Transport Statement or Assessments which should include:
- Surveys of parking capacity and occupancy levels on surrounding streets and parking areas
  - Consideration of likely trip generation and parking accumulations for the proposed development with supporting evidence
  - Details of how the parking will be managed and how that will mitigate any under or over-provision
- 1.20 This is not considered to be an exhaustive list, and there may be other factors associated with the specific characteristics of each site which may need to be considered. In all cases, where an applicant is considering a departure from the standards, the Council encourages early pre-application discussions.
- 1.21 Where a reduction in parking could lead to a transfer of parking into other locations, appropriate financial contributions may also be required for the introduction or expansion of Residents Parking Zones.

## **2. Car Parking Standards**

- 2.1 The standards set out in Table 1 below show the detailed car parking standards expected for each type of land use. These should be treated as maximum standards and applied in accordance with the supporting guidance notes provided below.
- 2.2 Care should be taken to ensure that parking is well designed, easily accessible and is sympathetic to the surrounding environment, particularly in residential areas. Unallocated parking spaces required for visitor parking in residential areas should be seamlessly integrated into the public realm to reduce the visual impact, and be suitably located so that they do not cause obstructions to the highway.

### **Car Parking in the City Centre**

- 2.3 The level of privately allocated car parking for applications within the city centre will be determined on a site by site basis on the merits of the application and criteria in the NPPF.
- 2.4 The provision of private car parking will not generally be promoted within city centre as it is highly accessible by a range of transport modes and there is already an adequate supply of publicly available car parking. However it is recognised that in some cases a small allocation may be appropriate. The justification of any provision should be set out in the accompanying Transport Assessment or Statement as appropriate. In cases where private car parking is provided, opportunities should be sought to provide parking as part of the building, underground, or as a multi storey arrangement to maximise the density of development.
- 2.5 The promotion of Travel Plans (where required) will be expected to support the promotion of demand management measures including public transport, walking and cycling and the encouragement of communal car facilities such as publicly available car parking and car clubs. This helps to reduce the impact of car parking on the local environment and increase the overall density of development in the city centre. For residential developments in the city centre, it is recommended that the purchase of long-term car parking passes for public car parks is promoted through the relevant Travel Plan.

## Parking for Electric Vehicles

- 2.6 As set out in policy Acc 3, the City Council is supportive of an uptake in low emission and electric vehicles. In order to ensure that all new developments are equipped with the necessary infrastructure, new developments will be expected to include, where practical, appropriate provision for electric car charging points. Electric vehicle parking should be counted as part of the total parking provision, and bays should be clearly marked.
- 2.7 5% of all new parking spaces should include provision for electric car charging points. In cases where the provision of this allocation is demonstrated to be impractical, 5% of spaces should have the capacity to easily retrofit recharging points. This should include the provision of ducting to accommodate a suitable power supply which facilitates high speed recharging.
- 2.8 For larger developments, details of how electric vehicle charging will be allocated, located and managed should, where applicable, be included within the relevant Transport Assessments or Transport Statement. The management of the charging points, including the mechanism/procedure for charging, will be the responsibility of the developer/occupier.
- 2.9 In cases where charging points, including infrastructure to enable retrofitting, cannot be provided within the development site, developer contributions may be sought to enable those facilities to be suitably provided in other locations including public car parks or on-street parking spaces.
- 2.10 The West Midlands Good Practice Air Quality Planning Guidance (2014) provides details on a recommended technical specification for electric charging points and should therefore be referred to in conjunction with these standards.

## Parking for People with Disabilities

- 2.11 In accordance with the City Council's objectives to promote equality, accessibility and to be an Age Friendly City, new developments must incorporate provision for blue badge holders. New developments, excluding individual dwellings with private off street parking, will be expected to allocate 5% of the total parking provision for blue badge holders. These spaces should be appropriately designed to meet the requirements of people with reduced mobility in accordance with good practice such as the Department for Transport's Inclusive Mobility (2005).

## Parking for Goods Vehicles

- 2.12 In accordance with Local Plan Policy Acc 7 appropriate off-street parking, loading/unloading, waiting and turning areas should be provided for HGVs to prevent obstructions to the highway causing delays and road safety issues. Each application will be assessed on its own merits.
- 2.13 It will be necessary to demonstrate in the application and through Transport Statements / Transport Assessments how goods vehicles will be managed as part of the proposed development, particularly in areas where the presence of HGVs has the potential to cause traffic management and road safety issues.

## Drop-Off and Loading Areas

- 2.14 Parking for coaches to set passengers down and pick them up will be considered appropriate and necessary for certain uses and developments, most notably those which are leisure related. However, this requirement will be unique to each site and therefore will be considered on a case by case basis.
- 2.15 For class D1 education establishments, appropriate provision for safe drop-off facilities should be considered to discourage inappropriate on-street parking. The level of provision will be determined on the merits of the application and the characteristics of the site and surrounding area.

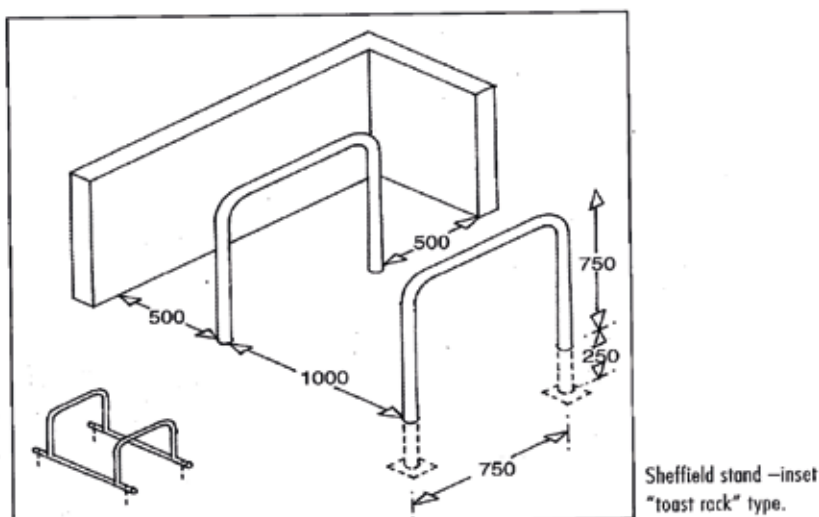
### 3. Cycle Parking Standards

- 3.1 Fear of theft or damage to the cycle is often cited as a major deterrent to cycling. Well- planned and secure cycle parking is therefore an essential element in increasing the level of cycle use. The provision of cycle parking must be considered early in the planning and design process.
- 3.2 The standards in table 1 apply to all areas in the city, and specify different requirements for staff, residents, pupils/students and customers or visitors. This is because staff, residents and pupils/ students require cycle parking that is more secure for long-stay use whereas customers or visitors will usually be parking for a shorter period.
- 3.3 It should usually be possible to provide cycle parking spaces within the development site. In cases where this is not possible, a commuted sum (secured through a legal agreement) may be required by the City Council which will be used to provide appropriate cycle parking facilities off-site.
- 3.4 To increase the attraction of commuting by cycle, it is important to provide facilities for cyclists at their destinations. These facilities should include changing areas, storage areas for personal items and space to dry wet clothing and showers.
- 3.5 For large developments, or in exceptional circumstances, the cycle parking allocation can be open to negotiation. In these cases the applicant will be required to provide justification regarding the level of expected provision bearing in mind the characteristics of the development site and the nature of the proposed development. The phasing of provision may be appropriate in some instances.

#### Design Details

- 3.6 To discourage theft or vandalism, cycle parking should be secure, well lit, clearly signed and situated in prominent, accessible and convenient locations that benefit from casual surveillance by passers-by and more formal surveillance by staff or CCTV. It should also be located within a short distance of the main entrance(s) to the building(s).
- 3.7 The use of 'Sheffield' stands is recommended as a minimum and is especially suitable for customer or visitor parking. The 'Sheffield' stand is a single 50mm diameter tube with two right angle bends and provides for two cycles. A detailed specification is shown at Figure 1 below.
- 3.8 At any site where 10 or more spaces are provided, they should be covered, well-lit and clearly signed. The detailed design and lighting of these facilities must have regard to the locality and setting of the proposed development.

Figure 1: Sheffield Stand design specification (copyright Institution for Highways and Transportation)



- 3.9 Cycle parking equipment which only holds one wheel of a bicycle e.g. 'butterfly' clips or concrete slots will not be acceptable. They provide inadequate security and can damage the wheels of a bicycle.
- 3.10 For long-stay parking for residents, staff and pupils/students, more secure provision will be expected. This should be in the form of cycle lockers, a locked compound with Sheffield Stands provided that they are under cover or Sheffield Stands located within an area that is already secure (access restricted to staff or similar). Design specifications for cycle lockers and locked compounds are shown in Figures 2 and 3.

Figure 2: Cycle Lockers Design Specification

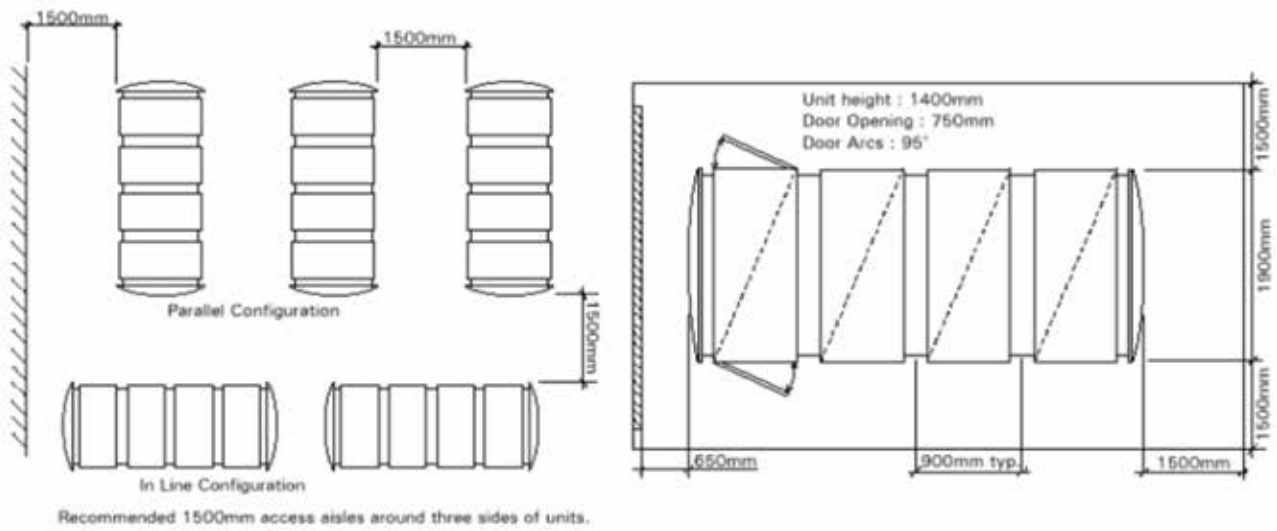
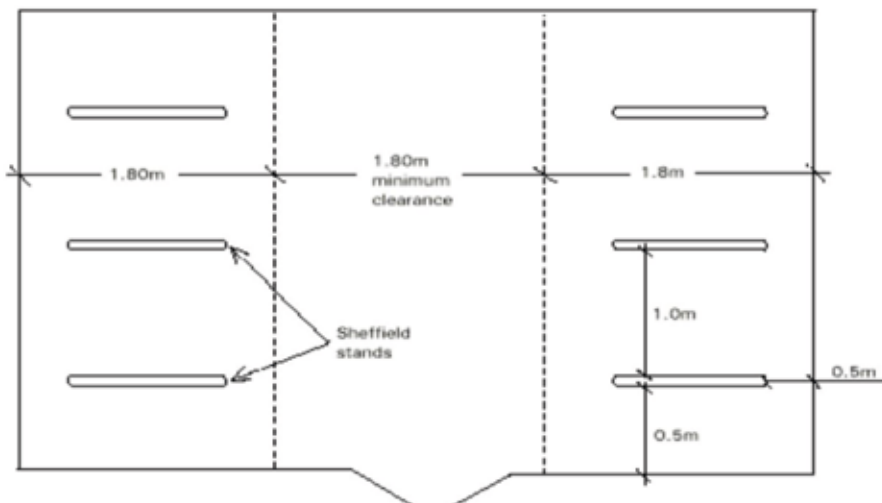


Figure 3: Locked Compound Design



## Notes for Table 1

### Car Parking Standards

1. All standards should be calculated on external gross floor space (m<sup>2</sup>) unless otherwise stated.
2. In order for garages in residential developments to qualify as part of the parking provision they must be a minimum of 3m x 6m internally.
3. Unallocated visitor car parking for C3 residential dwellings should be provided in the form of appropriately marked publicly available spaces. In cases where this is provided as part of the highway, spaces must be seamlessly integrated into the public realm to reduce the visual impact, and be suitably located so that they do not cause obstructions to other highway users.
4. FTE means Full Time Equivalent.
5. Where it is calculated that part of a space is required, this should be rounded up.
6. Provision should be allocated for Blue Badge holders, in accordance with para 2.11 above.
7. Provision should be allocated for electric car charging in accordance with paras 2.6 to 2.10 above.
8. 5% of the total car parking provision should be allocated for people with disabilities / blue badge holders.
9. Parking spaces for people with disabilities should be at least 3.6 metres wide and 6.0 metres long. This is equivalent to 2.4m x 4.8m, with an additional 1.2 metres at the side and end of the bay.

### Cycle Parking Standards

10. A Sheffield type stand (see Figure 2 below) is capable of allowing two bicycles to be parked if correctly installed (2 spaces).
11. In most residential developments, the use of suitably sized garages or sheds will be acceptable as cycle storage provision. A method of securing the cycle to a solid wall is encouraged.
12. For flats, maisonettes and managed schemes, secure communal space(s) should be provided on the ground floor or in a basement area provided that ramped access is available.
13. FTE means Full Time Equivalent.
14. All standards should be calculated on external gross floor (m<sup>2</sup>) space unless otherwise stated.

**Table 1 - Car and Cycle Parking Standards**

Use Class	Outer City Car Parking spaces	Inner and Outer City Cycle Parking spaces
<b>A1 - Shops (m<sup>2</sup>) Food</b>	1 per 25m <sup>2</sup>	<b>Under 2,500m<sup>2</sup></b> 1 per 200m <sup>2</sup> for customers 1 per 400m <sup>2</sup> for staff Minimum of 2 spaces
		<b>Over 2,500m<sup>2</sup></b> 1 per 400m <sup>2</sup> for customers 1 per 600m <sup>2</sup> for staff
<b>A1 - Shops (m<sup>2</sup>) Non-food</b>	1 per 35m <sup>2</sup>	1 per 400m <sup>2</sup> for customers 1 per 400m <sup>2</sup> for staff Minimum of 2 spaces
<b>A2 - Financial and Professional Services</b>	1 per 30m <sup>2</sup>	1 per 400m <sup>2</sup> for customers 1 per 400m <sup>2</sup> for staff A minimum of 2 spaces
<b>A3 - Restaurants and Cafés (dining area m<sup>2</sup>)</b> <b>A4 - Drinking Establishments (bar area m<sup>2</sup>)</b> <b>A5 - Hot Food Takeaways (public area m<sup>2</sup>)</b>	1 per /10m <sup>2</sup>	1 per 10 staff members (FTE) 1 per 200m <sup>2</sup> for customers Minimum of 2 spaces
<b>B1- Business/Research &amp; Development</b>	1 per 45m <sup>2</sup>	1 per 400m <sup>2</sup> for staff 1 per 400m <sup>2</sup> for visitors Minimum of 2 spaces
<b>B1/B2 - Light or General Industrial</b>	1 per 60m <sup>2</sup>	<b>Under 4,000m<sup>2</sup></b> 1 per 400m <sup>2</sup> for staff 1 per 750m <sup>2</sup> for visitors Minimum of 2 spaces
		<b>Over 4,000m<sup>2</sup></b> 1 per 500m <sup>2</sup> for staff 1 per 1,000m <sup>2</sup> for visitors
<b>B8 - Storage and Distribution</b>	1 per 100m <sup>2</sup>	<b>Under 4,000m<sup>2</sup></b> 1 per 400m <sup>2</sup> for staff 1 per 750m <sup>2</sup> for visitors A minimum of 2 spaces
		<b>Over 4,000m<sup>2</sup></b> 1 per 500m <sup>2</sup> for staff 1 per 1000m <sup>2</sup> for visitors



Use Class	Outer City Car Parking spaces	Inner and Outer City Cycle Parking spaces
<b>C1- Hotels</b>	1 per 2 bedrooms + parking provision for any A3 and D2 uses	1 per 10 staff members (FTE) 1 per 8 bedrooms for customers Minimum of 2 spaces
<b>C2 - Residential Institutions Care &amp; Nursing Homes</b>	1 per 4 bed spaces + 1 per 2 staff members (FTE)	1 per 10 staff members (FTE) 1 per 8 bedrooms for visitors Minimum of 2 spaces
<b>C2 - Hospital</b>	1 per 2 staff members (FTE) + and 1 per 2 bed spaces	1 per 10 staff members (FTE) 1 per 20 beds for visitors Minimum of 2 spaces
<b>C2A - Secure Residential Institutions</b>	Parking provision will be considered on a site by site basis.	
<b>Student Accommodation (Halls of Residence) &amp; Residential Schools/Colleges</b>	1 per 4 bedrooms	1 per 4 bedrooms for students 1 per 20 bedrooms for visitors (See note 12 above)
<b>C3 - Residential Dwellings (per unit) 1 bedroom house/flat</b>	1 per dwelling + 1 unallocated space per 5 dwellings for visitors (See note 3 above)	1 per dwelling (See notes 11 & 12 above)
<b>C3 - Residential Dwellings (per unit) 2 bedroom house/flat</b>	2 per dwelling + 1 unallocated space per 10 dwellings for visitors (See note 3 above)	1 per dwelling (See notes 11 & 12 above)
<b>C3 - Residential Dwellings (per unit) 3 or more bedroom house/flat</b>	2 per dwelling + 1 unallocated space per 5 dwellings for visitors (See note 3 above)	2 per dwelling (See notes 11 & 12 above)
<b>C4 - Houses in Multiple Occupancy (HiMOs)</b>	0.75 per bedroom	1 per 3 bedrooms (See notes 11 & 12 above)
<b>D1 - Medical or Health Services (Non Residential)</b>	Parking provision will be considered on a site by site basis.	1 per 6 staff members (FTE) 0.5 per treatment room for visitors Minimum of 2 spaces
<b>D1 - Creche, Nursery</b>	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE), 1 per 15 children for visitors Minimum of 2 spaces
<b>D1 - Education Establishment Primary schools</b>	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE) and 1 per 500 students for visitors 1 per 5 students for student use

Use Class	Outer City Car Parking spaces	Inner and Outer City Cycle Parking spaces
<b>D1- Education Establishment Secondary Schools</b>	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE) and 1 per 500 students for visitors 1 per 5 students for student use
<b>D1- Education Establishment Further / higher education (Colleges and Universities)</b>	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE) and 1 per 500 students for visitors 1 per 5 students for student use
<b>D1 - Art Gallery/ Museum/ Library/Public Hall</b>	1 per 30m <sup>2</sup>	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
<b>D1 - Place of Worship</b>	1 per 10m <sup>2</sup>	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
<b>D2 - Assembly and Leisure Cinema</b>	1 per 8 seats	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
<b>D2 - Assembly and Leisure Gym/ Fitness Centre</b>	1 per 15m <sup>2</sup> public areas	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
<b>D2 - Assembly and Leisure Sports Hall</b>	1 per 20m <sup>2</sup> public areas	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
<b>D2 - Assembly and Leisure Concert / Bingo Hall</b>	1 per 8 seats	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
<b>Sui Generis</b>	Parking provision will be considered on a site by site basis.	