

1. Overall Levels of Growth and the Duty to Cooperate

Introduction

After a period of population decline during the 80's, 90's and early 00's 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 Plan's 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

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 has 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

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

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 centre's 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 Litchfield 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.
4. 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

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:

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.

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.

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.

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.