



Residential Density Policy H9 Background Paper

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Introduction

Located within tight administrative boundaries, Coventry has a finite amount of undeveloped land, set alongside environmental and greenbelt designations as per the 2017 adopted Local Plan as such there are relatively limited opportunities for significant new development. It is therefore critical that new development is provided in a sustainable way which looks to maximise the use of this finite resource. Construction of new residential development which makes the best use of this limited land resource will be critical in ensuring that the City can meet its own housing needs.

This background paper contextualises a review of the current residential development density policy (Policy H9 of the Coventry Local Plan 2017), articulating the issues identified at regulation 18 consultation, the received consultation responses which pertain to the issue of residential density in the City, and the rationale for revision to the current local plan policy.

The main benefits for using and measuring density on developments include ensuring that:

- housing is available for the population
- what is built is appropriate to its location
- households can easily access services, infrastructure and employment, and
- available services and infrastructure are effectively used and can help planning for the provision of facilities and services in the future.

By measuring density, development can be appropriately planned in order to make the most efficient use of land available. Housing density can be measured as follows:

- Number of habitable rooms
- Quantity of floor area (in sq metres)
- Number of Dwellings per hectare (dph)

Dwellings per hectare (dph) is the most widely used density measure nationwide and is considered to be the most appropriate means of measuring density for the purposes of informing policy, this is also the measure applied to the currently adopted plan policy H9. Housing density can be assessed as either a measure of dwellings per hectare of the site's gross area or its net area. The term 'gross site area' is defined as the total land area of which the development will form part. The term 'net site area' is defined as the land that is available for development, otherwise known as the developable area.

In planning practice, it is common to determine the net site area as a percentage of the gross site area, known as the gross to net ratio. However, as individual sites developable areas can vary, net site areas can be broadly established through analysis of known site constraints and any designations affecting the site. Existing policy H9 clarifies that the

density minimums stated are in the context of a 'net' density figure and this approach is carried forward within the developed policy, therefore maintaining consistency of application.

It would not be appropriate to identify an upper limit to density, due to site specific design characteristics and differing local character profiles. To ensure that appropriate densities are achieved as far as possible, the applicant's design and access statement should clearly explain the rationale of the design and layout to justify the proposed density with reference to the accessibility to services and the compatibility with local character.

National Policy Context

Paragraph 128 of the National Planning Policy Framework (December 2023) entitled 'Achieving Appropriate Densities' states that planning policies and decision should support development which makes effective use of land, taking into account :

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed and beautiful, attractive and healthy places.*

Additionally, paragraph 129 reinforces the importance of making effective use of land through higher density development, stating that "Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site."

Coventry City Council have therefore identified that a review of the residential density policy H9 is required and proportional to form part of the Local Plan Review, with NPPF paragraph 129 further stating that :

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards*

should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;

b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and

c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

Emerging National Policy Context

At the time of writing, National Government has undertaken consultation upon proposed revisions to the NPPF, being undertaken between 20th July and 24th September 2024. In regard to residential density, the consultation proposes the omission of paragraph 130, identifying that para 130's current inclusion may suppress density levels. National government's narrative at Chapter 3 paragraph 11 of the consultation states that *"By restricting density, the existing policy is likely to have longer term negative impacts on achieving sustainable patterns of development and on meeting expectations on future housing supply. Alongside this reversal, we propose strengthening expectations that plans should promote an uplift in density in urban areas."*

Further, in introduction the Government states at Chapter One states an aim of revision to the NPPF to be to "broaden the existing definition of brownfield land, and set a strengthened expectation that applications on brownfield land should be approved, and that plans should promote an uplift in density in urban areas" The review of Policy H9 of the adopted Local Plan therefore aligns both to the existing and emerging policy context which seeks to make most efficient use of development land to deliver housing supply, whilst also recognising the proposed NPPF revisions to promote uplifts in density in urban areas.

Density alongside other Local Policies

The Coventry Local Plan policy H9 has established minimum density requirements for new residential development whilst also ensuring compatibility with the quality, character and amenity with the surrounding area. The Plan Review proposes to retain this cross referencing to other plan policies when engaging density policy in the development management process.

Alongside the reviewed policy, reference should also be made to the City Councils proposals to incorporate Nationally Described Space Standards (NDSS) into a local plan policy requirement. By following good urban design principles and the formation of residential layouts in an efficient manner, the requirement for internal space standards are anticipated to be achievable whilst achieving an appropriate optimal density. It should also be noted that where higher density development is promoted within the city centre and its local transitional zone, it is likely that the built form in these areas may deliver 3+ storey development, and would therefore further support the requirements for increased density, alongside housing mix and internal space standards.

Regulation 18 Consultation

Within the Issues and Options Consultation (regulation 18) policy H9 was noted as being subject to possible revision, however the consultation also recognised that with these standards being minimums, the policy could remain unchanged and remain up to date. The consultation also stated that there may be opportunity to revise minimum density standards in areas outside of the ring road.

The responses to the topic with the consultation showed a split of responses between those who felt the policy was up to date, and those who felt it should be updated. Several respondents felt that some areas outside the ring road (but still 'city centre') were appropriate for densification whereas other commented that they thought the current figure of 200dph within the ring road area was already high. Comments also noted that that there needs to be flexibility within the policy, as other factors may impact on being able to deliver a specified density minimum.

Policy H9 Evolution

Further to consultation responses at Issues and Options, the Council assessed that it would be proportionate to undertake a review of recent development precedents of density across the city, in a number of varied contexts, this study sought to inform if the current policy is in alignment to development proposals which have gained approval through the planning process and have therefore been assessed to have satisfied other plan policies. Additionally, the Council has also referred to National best practice examples of residential development, establishing an evidence base which was both referential to recently consented and constructed residential development in the authority area, and looking ahead to emerging residential typologies and what these may represent in regard to residential density precedents which may emerge over the forward plan period.

The findings of this precedent study have informed the minimum density standards now proposed within the local plan review, whilst maintaining that these minimum standards must be read within the context of other plan policies to ensure contextual compatibility whilst promoting effective use of development land. To further ensure contextual

compatibility of residential development, the Local Authority will also be developing Design Codes, to support and guide the highest quality and most contextually responsive development in the City.

Sustainability Appraisal

The authority has undertaken a Sustainability Analysis in support of the plan review which has specifically referenced the topic of residential density, testing impacts against a range of areas. The SA tested a range of options and found that the policy proposed to be the preferred, further to analysis against a number of areas. Key to the findings of the SA on this matter was the identified benefits of the policy approach in the delivery of vibrant and inclusive communities, access to services, increase in availability of sustainable travel choices and alongside other plan policies, the protection of character of townscapes and landscapes. Crucially the SA also notes the policy's role in the delivery of housing for all and providing greater certainty to the authorities delivery of its housing needs.

Conclusion

Further to undertaking this density study, it has been established that planning approvals have often been seen to exceed the density minimums set out in the adopted plan policy H9, whilst existing residential housing stock showed a range of development densities, reflecting the wide variety of contexts which are present authority wide. The study also identified that current plan policy H9 establishes a sharp distinction in density guidance from the city centre to those sites which lie outside of the ring road, including those in close proximity to the city centre and still within an urban context.

Given the wide variety of contexts to which the 35Dph figure currently then applies, it is not felt that setting a consistent density figure from very central, urban contexts to those to the edge of the authority boundary in sub-urban and semi rural contexts delivers a positive policy responsive to the aims of the NPPF in uplifting density in sustainable locations. Furthermore this policy position may indeed promote uncomfortable relationships of building scale, and an establishment of a density transition to and from the City Centre would yield more successful inter-relationship and positive policy response, whilst also being more reflective to the prevailing urban character of the area surrounding the defined city centre and delivering a policy with greater alignment to the aims of the NPPF.

The City Council have therefore developed a modified residential policy H9 which seeks to promote transitions in density between the city centre and those immediately adjacent, whilst also updating density guidance across the city to be reflective of development precedents and national best practice precedents. Local Plan Policy H9 is therefore proposed to be revised to include a 'transitional zone' area around the City Centre which will be identified within Appendices to the Local Plan, whilst also modifying

density expectations in greenfield, brownfield and City Centre development sites to help ensure the most efficient use of development land to meet the Cities housing needs.

Reviewed Policy H9: Residential Density

1. Residential development, including conversions, must make the most effective and efficient use of land, and national policy promotes the uplifting of development density in sustainable locations.
2. Proposed development density should be informed by a site's local character and context, in alignment with other plan policies.
3. To ensure that the most effective use of land, new developments, with relevant consideration to Part 2 of this policy, should seek to deliver the following densities:
 - Greenfield sites – 35Dph
 - Brownfield Sites – 45Dph
 - Sites within the City Centre Transition zone* – 125Dph
 - Development within the defined City Centre boundary* - 250Dph

**City Centre boundary and Transition Zone as defined in Appendix 9d*