

Subject: Objection to Coventry City Council Local Plan – Regulation 19 Consultation

To: Coventry City Council Planning Department

From: Sally Rees

Date: 3rd March 2025

Introduction

I submit this document in response to the Coventry City Council Local Plan under the Regulation 19 Consultation and object to much of the content on the grounds that it fails to meet the requirements of national planning policy, overestimates housing need, and disregards environmental and infrastructure concerns.

My key objections are as follows:

- 1. The Housing Need Assessment is Flawed**
- 2. Excessive Land Allocation and Failure to Prioritize Brownfield Sites**
- 3. Lack of Infrastructure Planning and Coordination**
- 4. Neglect of Affordable Housing Priorities**
- 5. Failure to Consider a Dispersed Housing Strategy**
- 6. Significant Environmental and Biodiversity Impact**
- 7. Failure to Adhere to the Duty to Cooperate**
- 8. Exceptional Circumstances Warrant Returning Land to the Green Belt**

These points are substantiated by policy references, recent data, and legal planning principles.

1. The Housing Need Assessment is Flawed

- The Council's housing need figure of 1,455 dwellings per annum (dpa) is inconsistent with the latest New Standard Methodology (NSM), which requires only 1,388 dpa.
- ONS 2021 Census data confirms past population estimates were significantly overstated, largely due to incorrect assumptions about student populations.
- The National Planning Policy Framework (NPPF, Paragraph 61) mandates that local plans be based on the most up-to-date and reliable evidence.

Conclusion: The Plan is based on an exaggerated housing need figure that does not reflect Coventry's actual demographic trends and should be revised accordingly.

2. Excessive Land Allocation & Failure to Prioritize Brownfield Sites

- Coventry's plan allocates 31,493 dwellings, despite only 27,760 dwellings being needed over the plan period.

- With additional windfall developments and student housing adjustments, there is an excess of 7,933 dwellings, making further land allocations unnecessary.
- NPPF Paragraph 119 requires councils to make the best use of brownfield land before developing greenfield sites. Coventry's plan ignores this requirement.

Conclusion: The Council's over-allocation of land contradicts national policy and must be reduced to align with actual housing need.

3. Lack of Infrastructure Planning and Coordination

- The plan fails to provide a clear strategy for infrastructure to support large-scale housing development.
- Key areas of concern include:
 - Road congestion and lack of sustainable transport options.
 - Overstretched healthcare services (GPs, hospitals, and emergency care).
 - Limited school capacity to support new residential areas.
- NPPF Paragraph 20 mandates that local plans include infrastructure planning, yet Coventry's plan lacks a coherent strategy.

Conclusion: The Plan is legally unsound due to insufficient infrastructure planning.

4. Neglect of Affordable Housing Priorities

- The Plan does not ensure that new housing developments cater to low-income families and key workers.
- Developers prioritize high-profit developments over social housing, exacerbating affordability issues.
- NPPF Paragraph 62 states that plans must ensure housing meets the needs of different income groups, which this plan fails to achieve.

Conclusion: Coventry City Council must amend the plan to prioritize affordable housing.

5. Failure to Consider a Dispersed Housing Strategy

- The Plan focuses too heavily on large developments, causing:
 - Infrastructure overload in concentrated areas.
 - Disconnection from existing communities.
 - Reliance on national developers rather than supporting local builders.
- A dispersed housing approach would:
 - Spread development across multiple smaller sites.

- Reduce strain on local services.
- Support local businesses and construction firms.

Conclusion: The Plan should incorporate a dispersed housing model to ensure more balanced and sustainable development.

6. Significant Environmental & Biodiversity Impact

- The Plan proposes development on environmentally sensitive sites, including:
 - Keresley Mere, a rare wetland habitat with fluctuating water levels essential for biodiversity.
 - The Alders and Bunsons Wood, which are ancient woodlands with protected species.
 - Pikehorn Wood, classified as an important long-established woodland.
- NPPF Paragraph 174 requires planning authorities to protect and enhance biodiversity, yet the Plan fails to do so.

Conclusion: Development on these sites violates national policy and should be reconsidered.

7. Failure to Adhere to the Duty to Cooperate

- Coventry City Council should not absorb excess housing requirements from Warwickshire if it means sacrificing Green Belt land.
- Any additional housing demand must be accommodated within Coventry's existing urban areas.
- South Warwickshire development proposals SGO1-3 should be reconsidered in light of Coventry's surplus housing supply.

Conclusion: The Plan must not use Coventry's Green Belt to offset Warwickshire's housing obligations.

8. Exceptional Circumstances Warrant Returning Land to the Green Belt

- The 2021 Census confirmed that the original basis for Green Belt removal was flawed.
- The NPPF (Paragraph 138) allows for Green Belt land to be reinstated when the original removal was unjustified.
- Specific areas for reinstatement:
 - Hounds Hill – a natural buffer zone.
 - The Alders & Pikehorn Wood – irreplaceable ancient woodlands.
 - Keresley Mere & adjacent fields – crucial for biodiversity.

- Restoring this land to the Green Belt aligns with national policy and environmental obligations.

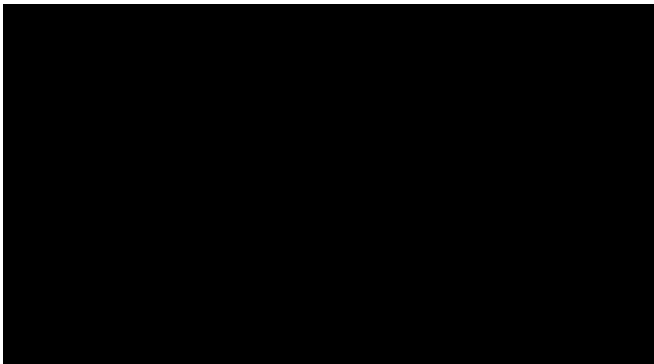
Conclusion: Land previously removed from the Green Belt should be reinstated to protect Coventry's natural heritage.

Final Recommendation: Plan Must Be Revised

The current Plan is unsound and requires the following revisions:

1. Adjust housing need calculations to align with the New Standard Methodology.
2. Reduce excessive land allocations.
3. Prioritize brownfield development over greenfield expansion.
4. Ensure infrastructure is planned and funded BEFORE major development.
5. Guarantee that new developments include a significant proportion of affordable housing.
6. Implement a dispersed housing strategy.
7. Reinstatement key areas to the Green Belt to protect biodiversity.

Signed:



Sally Rees

