

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

To: Coventry City Council Planning Department

From: Giles Rees

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Introduction

I am submitting this response in relation to the Coventry City Council Local Plan under the Regulation 19 Consultation. I have significant concerns regarding many aspects of the Plan, which I believe fail to comply with national planning policies, overstate the housing demand, and overlook vital environmental and infrastructure considerations.

The primary objections I wish to raise are as follows:

1. Inaccuracies in the Housing Need Assessment
2. Over-allocation of Land and Insufficient Focus on Brownfield Sites
3. Lack of Comprehensive Infrastructure Planning
4. Failure to Address Affordable Housing Needs
5. Lack of a Dispersed Housing Strategy
6. Potential Negative Impact on Environment and Biodiversity
7. Breach of Duty to Cooperate
8. Justification for Returning Land to the Green Belt

These concerns are supported by relevant policies, up-to-date data, and established planning principles.

1. Inaccuracies in the Housing Need Assessment

- The Council's estimated housing need of 1,455 dwellings per annum (dpa) does not align with the latest New Standard Methodology (NSM), which indicates a need for only 1,388 dpa.
- The ONS 2021 Census data highlights that previous population estimates were overly inflated, particularly due to inaccurate assumptions regarding the student population.

- According to the National Planning Policy Framework (NPPF, Paragraph 61), local plans must be based on the most current and reliable evidence available.

Conclusion: The housing need figure in the Plan is inflated and should be revised to reflect Coventry's true demographic trends.

2. Over-allocation of Land & Insufficient Focus on Brownfield Sites

- The Plan allocates 31,493 dwellings, whereas only 27,760 dwellings are necessary for the plan period.
- When factoring in additional windfall sites and adjustments for student housing, there is an excess of 7,933 dwellings, meaning additional land allocation is unnecessary.
- NPPF Paragraph 119 emphasizes the importance of prioritizing brownfield land before developing greenfield sites. The Plan fails to prioritize this approach.

Conclusion: The over-allocation of land in the Plan contradicts national policy and must be reduced to reflect the actual housing need.

3. Lack of Comprehensive Infrastructure Planning

- The Plan lacks a detailed strategy for the necessary infrastructure to support the proposed large-scale housing developments.
- Key infrastructure concerns include:
 - Increasing road congestion and the lack of sustainable transport options.
 - Strained healthcare services (e.g., GP capacity, hospital services, emergency care).
 - Inadequate school facilities to accommodate the new population.
- NPPF Paragraph 20 requires that local plans ensure the provision of infrastructure, but Coventry's plan lacks a clear and coordinated approach.

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

4. Failure to Address Affordable Housing Needs

- The Plan does not adequately address the housing needs of low-income families and essential workers.

- The focus on high-profit housing developments by private developers exacerbates the affordability crisis.
- NPPF Paragraph 62 mandates that local plans must meet the housing needs of various income groups, which the Coventry Plan fails to do.

Conclusion: Coventry City Council must revise the Plan to prioritize the development of affordable housing.

5. Lack of a Dispersed Housing Strategy

- The Plan's emphasis on large-scale developments leads to:
 - Overloaded infrastructure in certain areas.
 - A disconnect between new housing and established communities.
 - Increased reliance on national developers at the expense of local builders.
- A more dispersed housing strategy would:
 - Distribute development across multiple smaller sites.
 - Relieve pressure on local infrastructure.
 - Benefit local businesses and construction firms.

Conclusion: The Plan should incorporate a more distributed housing model to ensure more balanced, sustainable growth.

6. Potential Negative Impact on Environment and Biodiversity

- The Plan proposes development on environmentally sensitive areas, such as:
 - Keresley Mere, a rare wetland habitat vital for local biodiversity.
 - The Alders and Bunsons Wood, both ancient woodlands containing protected species.
 - Pikehorn Wood, an important long-established woodland.
- NPPF Paragraph 174 calls for the protection and enhancement of biodiversity, a requirement the Plan fails to meet.

Conclusion: Development in these environmentally sensitive areas contradicts national policy and should be reconsidered.

7. Breach of Duty to Cooperate

- Coventry City Council should not absorb additional housing requirements from Warwickshire if it results in the loss of Green Belt land.
- Additional housing demand must be met within Coventry's existing urban areas.
- The South Warwickshire development proposals (SGO1-3) should be reassessed, given Coventry's surplus housing supply.

Conclusion: The Plan must avoid using Coventry's Green Belt to accommodate housing demands from Warwickshire.

8. Justification for Returning Land to the Green Belt

- The 2021 Census data reveals that the initial rationale for removing land from the Green Belt was flawed.
- NPPF Paragraph 138 allows for the reinstatement of Green Belt land when the original removal was unjustified.
- Areas suitable for reinstatement include:
 - Hounds Hill, a natural buffer zone.
 - The Alders & Pikehorn Wood, irreplaceable ancient woodlands.
 - Keresley Mere and surrounding fields, which are vital for biodiversity.

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

Final Recommendation: Revision of the Plan

The current Local Plan is unsound and must be revised to:

1. Align housing need calculations with the New Standard Methodology.
2. Reduce the over-allocation of land.
3. Prioritize the use of brownfield sites over greenfield expansion.
4. Ensure that infrastructure is planned and funded prior to development.
5. Guarantee that new developments include a substantial proportion of affordable housing.

6. Adopt a dispersed housing strategy for more sustainable development.
7. Reinstate key areas to the Green Belt to safeguard biodiversity.

Giles Rees

