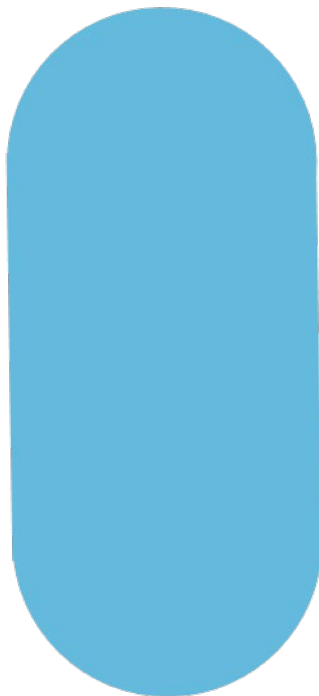


Representations

Coventry Local Plan Review –
Regulation 19 Proposed Submission (Publication) Stage
Consultation

Richborough

February 2025





1. The following representations are made in response to the Coventry Local Plan Review (CLPR) Regulation 19 Proposed Submission (Publication Stage) Consultation document (December 2024) on behalf of Richborough, in respect of their land interest at Land at Fivefield Road, Keresley, Coventry. As the Plan has reached Regulation 19 stage before 12th March 2025, the Plan will be assessed against the policies of the December 2023 Framework.

Policy DS1: Overall Development Needs – Plan Period

Not Sound

2. Policy DS1 is not positively prepared, justified, or consistent with national policy.
3. Policy DS1 1. defines the Plan period as 2021-2041. The Local Plan will not be adopted until at least 2026, five years into the Plan period. There is no justification for a Plan period that starts five years before the Plan is adopted, and there is no support for adopting such an approach in the NPPF or NPPG.
4. NPPF paragraph 21 requires strategic policies to look ahead over a minimum 15 year period. There is no requirement for strategic policies to also look backwards 5 years.
5. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement.
6. Policy DS1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351 completions¹. Therefore, there were 2,986 completions in excess of the proposed Local Plan requirement (7,351 - 1,455 x 3). The inclusion of supply between 2021-2024 means that the housing requirement for the 15 years ahead from 2026-2041 will not be met (total capacity 31,493² – 2,986 = 28,507 which is less than the minimum of 29,100 homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected.

¹ Table 5 of the HELAA November 2024

² Total projected completions up to 2041 in Appendix 3 Housing Trajectory



7. The December 2023 NPPF paragraph 60 clearly states the Government's objective is to significantly boost the supply of homes. That has not changed with the change in Government. By adopting a Plan period that looks back 5 years, the Council is manipulating the figures to avoid meeting the housing needs of the City.
8. Further to the above point, Policy DS1 1. only plans to 2041. NPPF Paragraph 22 is clear that Local Plans should look ahead over a minimum 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged.

Policy DS1: Overall Development Needs – Housing Requirement

9. Policy DS1 1. also specifies the minimum housing requirement as 29,100 (1,455 dpa). This is based on the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022), minus 10,180 dwellings (509 dpa) based on removing 35%. The removal of 35% is a reference to the 'urban uplift' which should be applied to the Local Housing Need calculation using the Standard Method, and not the HEDNA method of calculating housing need.
10. Whilst the HEDNA approach to determining the appropriate level of housing growth to be planned for in Coventry is considered acceptable in principle, concerns are raised relating to the future job growth forecasts used in preparing the HEDNA being unduly pessimistic.
11. The HEDNA uses the Cambridge Econometrics (CE) March 2021 baseline economic growth forecast. This forecast was prepared during the COVID-19 lockdown when economic growth was far from certain and was informed by uncertain economic conditions. The CE forecast is for 0.44% per annum growth (820 jobs per annum) in Coventry over the CLPR Plan period, less than the 1.0% per annum growth (equivalent to 1,995 jobs per annum) experienced since 1981, and growth of over 2% per annum between 2011 and 2019 (3,338 jobs per annum). The CE forecasts were also based on 3.6% GDP in 2021 and a 2.8% increase in GDP in 2022. Reference to



the ONS' December 2022 GDP monthly estimate report states how GDP is estimated to have grown by 4.0% in 2022, following growth of 7.6% in 2021.

12. Furthermore, the HEDNA identifies how 551 hectares of logistics floorspace is needed across the housing market area to 2041. However, the location for this land has not been confirmed and so the job growth associated with it has not been considered.
13. As a minimum, 1.0% growth since 1981 should be assumed, which aligns with the 1,964 dwellings per annum established by the HEDNA and emphasises how the housing requirement of 1,455 dwellings per annum is inadequate.
14. It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure of 1,964 dwellings per annum represents the minimum number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with national guidance³; for example in order to address a significant affordable housing shortfall, support economic development or address strategic infrastructure requirements which are likely to increase the number of homes needed.
15. The HEDNA describes affordable housing need across the HMA as “*clearly acute*” and identifies a “*notable need*” for affordable housing. It also states how it is clear that provision of new affordable housing is an “*important and pressing issue in the area*”. Figure 8 of the AMR 2023/24 shows that 2,933 affordable homes have been delivered since 2011 compared to a Local Plan requirement of 4,176 dwellings for the same period.
16. The HEDNA calculates *significantly higher* affordable need in CCC of approximately 2,000 affordable dwellings per annum. This reflects the Council’s waiting list (over 13,000 households), a 68% increase in the number of households in temporary accommodation in only 24 months, a 114% increase in only five years in the number of households who are homeless and owed a relief duty, and the fact that Coventry

³ Paragraph: 010 Reference ID: 2a-010-20201216 of National Planning Practice Guidance



has the 12th highest ratio of homeless households per 1,000 population of over 300 local authorities in England.

17. Addressing affordable housing need in any meaningful way will require an uplift to the HEDNA's calculation of 1,964 dwellings per annum.
18. Further consideration should also have been given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan and which are not addressed within the Duty to Co-operate Statement.

Birmingham and the Black Country

19. There are strong functional relationships between Birmingham, the Black Country and Coventry, in terms of transport connections and commuting patterns, and development in Coventry can contribute towards meeting unmet needs. Whilst Coventry has historically not been seen as part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), Coventry was recognised within the HMA Strategic Growth Study commissioned by the local authorities as being a location that could contribute to addressing unmet needs given its strong functional links.
20. The most recent GBBCHMA Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings arising from the GBBCHMA with total contributions of only 18,181 dwellings committed. However, this is now out-of-date on account of Local Plan progress and revisions to the calculation of Local Housing Need derived from the Standard Method. Work is underway to update the Position Statement to 2025.

Birmingham

21. There are strong functional relationships between Birmingham and Coventry and the relationships across the wider area should be understood including the relationship between homes and jobs as a Functional Economic Market Area.



22. It is recognised that the shortfall arising from Birmingham is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum given the Local Housing Need derived from the Standard Method has decreased to 4,448 dwellings per annum. Indeed, based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Birmingham Local Plan period 2020 to 2042 and comparing with reported supply in the Birmingham Local Plan Preferred Options (July 2024), the shortfall arising from Birmingham will have been eradicated.

Dudley

23. The Dudley Local Plan was subject to Regulation 19 consultation in October and November 2024. It reports a housing need of 11,169 dwellings in the Plan period 2024 to 2041 with supply of 10,470 dwellings, resulting in a shortfall of 699 dwellings to be exported through the Duty to Cooperate.
24. It is noted that the housing requirement is based on the Local Housing Need derived from the previous Standard Method of 657 dwellings per annum; this has now increased significantly to 1,462 dwellings per annum.
25. Should the Dudley Local Plan be submitted for Examination before 12th March 2025 it will be captured by the transitional arrangements set out in the NPPF and able to continue on the basis of the lower Local Housing Need derived from the previous Standard Method. However, should the Dudley Local Plan not progress to Examination before 12th March 2025, the Council will be required to utilise the increased Local Housing Need derived from the Standard Method for plan-making. Based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Dudley Local Plan period 2024 to 2041 and comparing with reported supply in the Dudley Local Plan Publication Plan (October 2024), the shortfall arising from Dudley would increase to some 14,384 dwellings.

Sandwell



26. The Sandwell Local Plan was submitted for Examination in December 2024. It reports a supply of 10,434 dwellings compared with a housing need of 26,350 dwellings in the Plan period 2024 to 2041, resulting in a shortfall of some 15,916 dwellings to be exported through the Duty to Cooperate.

27. It is noted that Sandwell's Local Housing Need derived from the Standard Method has marginally reduced from 1,550 dwellings per annum to 1,346 dwellings per annum, however given the stage of preparation of the Sandwell Local Plan it is captured by the transitional arrangements in the NPPF. In any case, the shortfall in supply in Sandwell is significant.

Walsall

28. Further to the disbandment of the Black Country Plan in late 2022, Walsall Council have not yet made notable progress on a new Local Plan, with Issues and Options consultation is expected in 2025. Given the shortfall reported in the Black Country Plan and the increase in Walsall's Local Housing Need derived from the Standard Method since (now 1,148 dwellings per annum), it is likely that there will continue to be a shortfall arising from Walsall that requires consideration.

Wolverhampton

29. The Wolverhampton Local Plan was subject to Regulation 19 consultation in November 2024 to January 2025. It reports a housing need of 19,728 dwellings in the Plan period 2024 to 2042 with supply of 9,330 dwellings, resulting in a shortfall of some 10,398 dwellings to be exported through the Duty to Cooperate.

Contributions to Shortfall

30. The GBBCHMA Position Statement Addendum outlines contributions towards unmet needs committed at April 2023, however several of these commitments have now fallen away or been reduced.



31. 2,665 dwellings contribution from Lichfield are noted in the Position Statement Addendum, however the Lichfield Local Plan was withdrawn in October 2023. Initial work on a new Local Plan has commenced and was subject to Issues and Options consultation in October to December 2024. The Issues and Options document confirms commitment to the Duty to Cooperate but does not set a commitment to meeting unmet needs arising from the GBBCHMA.
32. 1,500 dwellings contribution from Shropshire are noted in the Position Statement Addendum. Whilst this is still maintained, the Shropshire Local Plan Review is currently under scrutiny at Examination with significant soundness concerns raised by the Inspectors. There is therefore potential for the Shropshire Local Plan Review to be withdrawn and the committed contribution to unmet needs to disappear.
33. 2,105 dwellings contribution from Solihull are noted in the Position Statement Addendum, however the Solihull Local Plan Review was withdrawn in October 2024, with no progress yet made on a new Local Plan.
34. 4,000 dwellings contribution from South Staffordshire are noted in the Position Statement Addendum, however this has been reduced to 640 dwellings in the South Staffordshire Local Plan submitted for Examination in December 2024.
35. The net result of the above is a reduction of some 8,130 dwellings in commitments to unmet needs arising from the GBBCHMA, with a further 1,500 dwellings committed also potentially falling away.
36. It is noted that the Telford and Wrekin Local Plan Review will be subject to Publication consultation from March 2025 and includes a commitment to 153 dwellings per annum towards unmet needs arising from the Black Country, however the total level of unmet needs to be met is not clear and it remains untested through Examination.

Conclusion on Unmet Needs

37. Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum,



the shortfall is still significant. In addition, the level of committed contributions towards unmet needs has decreased.

38. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry in the Duty to Co-Operate Statement. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF.
39. Policy DS1 1. should therefore be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country.

Policy DS1: Overall Development Needs – Review Mechanism

40. Separately, Policy DS1 4. fails to state that the Council will review its Local Plan policies within 5 years of the date of adoption, and therefore is not consistent with the NPPF paragraph 33 or the expectation within the Levelling-Up and Regeneration Act 2023 where Plans should be in place within 5 years of the previous Plan being adopted. Further, paragraph 33 requires strategic policies to be updated if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. This is not reflected in the criteria a-d. under 4. in DS1.
41. Policy DS1 4. should be amended to be consistent with paragraph 33 of the NPPF.

Policy H1: Housing Land Requirements – Plan Period

Not Sound

42. Policy H1 is not positively prepared, justified, or consistent with national policy.
43. Policy H1 1. defines the Plan period as 2021-2041. The Local Plan will not be adopted until at least 2026, five years into the Plan period. There is no justification for a Plan



period that starts five years before the Plan is adopted, and there is no support for adopting such an approach in the NPPF or NPPG.

44. NPPF paragraph 21 requires strategic policies to look ahead over a minimum 15 year period. There is no requirement for strategic policies to also look backwards 5 years.
45. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement.
46. Policy H1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351 completions⁴. Therefore, there were 2,986 completions in excess of the proposed Local Plan requirement (7,351 - 1,455 x 3). The inclusion of supply between 2021-2024 means that the housing requirement for the 15 years ahead from 2026-2041 will not be met (total capacity 31,493⁵ – 2,986 = 28,507 which is less than the minimum of 29,100 homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected.
47. The NPPF paragraph 60 clearly states the Government's objective is to significantly boost the supply of homes. That has not changed with the change in Government. By adopting a Plan period that looks back 5 years, the Council is manipulating the figures to avoid meeting the housing needs of the City.
48. Further to the above point, Policy H1 1. only plans to 2041. NPPF Paragraph 22 is clear that Local Plans should look ahead over a minimum 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged.

Policy H1: Housing Land Requirements – Housing Requirement

Not Sound

⁴ Table 5 of the HELAA November 2024

⁵ Total projected completions up to 2041 in Appendix 3 Housing Trajectory



49. Policy H1 1. also specifies the minimum housing requirement as 29,100 (1,455 dpa). This is based on the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022), minus 10,180 dwellings (509 dpa) based on removing 35%. The removal of 35% is a reference to the 'urban uplift' which should be applied to the Local Housing Need calculation using the Standard Method, and not the HEDNA method of calculating housing need.
50. Whilst the HEDNA approach to determining the appropriate level of housing growth to be planned for in Coventry is considered acceptable in principle, concerns are raised relating to the future job growth forecasts used in preparing the HEDNA being unduly pessimistic.
51. The HEDNA uses the Cambridge Econometrics (CE) March 2021 baseline economic growth forecast. This forecast was prepared during the COVID-19 lockdown when economic growth was far from certain and was informed by uncertain economic conditions. The CE forecast is for 0.44% per annum growth (820 jobs per annum) in Coventry over the CLPR Plan period, less than the 1.0% per annum growth (equivalent to 1,995 jobs per annum) experienced since 1981, and growth of over 2% per annum between 2011 and 2019 (3,338 jobs per annum). The CE forecasts were also based on 3.6% GDP in 2021 and a 2.8% increase in GDP in 2022. Reference to the ONS' December 2022 GDP monthly estimate report states how GDP is estimated to have grown by 4.0% in 2022, following growth of 7.6% in 2021.
52. Furthermore, the HEDNA identifies how 551 hectares of logistics floorspace is needed across the housing market area to 2041. However, the location for this land has not been confirmed and so the job growth associated it has not been considered.
53. As a minimum, 1.0% growth since 1981 should be assumed, which aligns with the 1,964 dwellings per annum established by the HEDNA and emphasises how the housing requirement of 1,455 dwellings per annum is inadequate.
54. It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure of 1,964 dwellings per annum represents the minimum number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement



in line with national guidance⁶; for example in order to address a significant affordable housing shortfall, support economic development or address strategic infrastructure requirements which are likely to increase the number of homes needed.

55. The HEDNA describes affordable housing need across the HMA as “*clearly acute*” and identifies a “*notable need*” for affordable housing. It also states how it is clear that provision of new affordable housing is an “*important and pressing issue in the area*”. Figure 8 of the AMR 2023/24 shows that 2,933 affordable homes have been delivered since 2011 compared to a Local Plan requirement of 4,176 dwellings for the same period.
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57. Addressing affordable housing need in any meaningful way will require an uplift to the HEDNA’s calculation of 1,964 dwellings per annum.
58. Further consideration should also have been given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan and which have not been addressed within the Duty to Co-Operate Statement.

Birmingham and the Black Country

⁶ Paragraph: 010 Reference ID: 2a-010-20201216 of National Planning Practice Guidance



59. There are strong functional relationships between Birmingham, the Black Country and Coventry, in terms of transport connections and commuting patterns, and development in Coventry can contribute towards meeting unmet needs. Whilst Coventry has historically not been seen as part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), Coventry was recognised within the HMA Strategic Growth Study commissioned by the local authorities as being a location that could contribute to addressing unmet needs given its strong functional links.
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2024 to 2041 with supply of 10,470 dwellings, resulting in a shortfall of 699 dwellings to be exported through the Duty to Cooperate.

64. It is noted that the housing requirement is based on the Local Housing Need derived from the previous Standard Method of 657 dwellings per annum; this has now increased significantly to 1,462 dwellings per annum.
65. Should the Dudley Local Plan be submitted for Examination before 12th March 2025 it will be captured by the transitional arrangements set out in the NPPF and able to continue on the basis of the lower Local Housing Need derived from the previous Standard Method. However, should the Dudley Local Plan not progress to Examination before 12th March 2025, the Council will be required to utilise the increased Local Housing Need derived from the Standard Method for plan-making. Based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Dudley Local Plan period 2024 to 2041 and comparing with reported supply in the Dudley Local Plan Publication Plan (October 2024), the shortfall arising from Dudley would increase to some 14,384 dwellings.

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66. The Sandwell Local Plan was submitted for Examination in December 2024. It reports a supply of 10,434 dwellings compared with a housing need of 26,350 dwellings in the Plan period 2024 to 2041, resulting in a shortfall of some 15,916 dwellings to be exported through the Duty to Cooperate.
67. It is noted that Sandwell's Local Housing Need derived from the Standard Method has marginally reduced from 1,550 dwellings per annum to 1,346 dwellings per annum, however given the stage of preparation of the Sandwell Local Plan it is captured by the transitional arrangements in the NPPF. In any case, the shortfall in supply in Sandwell is significant.

Walsall



68. Further to the disbandment of the Black Country Plan in late 2022, Walsall Council have not yet made notable progress on a new Local Plan, with Issues and Options consultation is expected in 2025. Given the shortfall reported in the Black Country Plan and the increase in Walsall's Local Housing Need derived from the Standard Method since (now 1,148 dwellings per annum), it is likely that there will continue to be a shortfall arising from Walsall that requires consideration.

Wolverhampton

69. The Wolverhampton Local Plan was subject to Regulation 19 consultation in November 2024 to January 2025. It reports a housing need of 19,728 dwellings in the Plan period 2024 to 2042 with supply of 9,330 dwellings, resulting in a shortfall of some 10,398 dwellings to be exported through the Duty to Cooperate.

Contributions to Shortfall

70. The GBBCHMA Position Statement Addendum outlines contributions towards unmet needs committed at April 2023, however several of these commitments have now fallen away or been reduced.

71. 2,665 dwellings contribution from Lichfield are noted in the Position Statement Addendum, however the Lichfield Local Plan was withdrawn in October 2023. Initial work on a new Local Plan has commenced and was subject to Issues and Options consultation in October to December 2024. The Issues and Options document confirms commitment to the Duty to Cooperate but does not set a commitment to meeting unmet needs arising from the GBBCHMA.

72. 1,500 dwellings contribution from Shropshire are noted in the Position Statement Addendum. Whilst this is still maintained, the Shropshire Local Plan Review is currently under scrutiny at Examination with significant soundness concerns raised by the Inspectors. There is therefore potential for the Shropshire Local Plan Review to be withdrawn and the committed contribution to unmet needs to disappear.



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74. 4,000 dwellings contribution from South Staffordshire are noted in the Position Statement Addendum, however this has been reduced to 640 dwellings in the South Staffordshire Local Plan submitted for Examination in December 2024.
75. The net result of the above is a reduction of some 8,130 dwellings in commitments to unmet needs arising from the GBBCHMA, with a further 1,500 dwellings committed also potentially falling away.
76. It is noted that the Telford and Wrekin Local Plan Review will be subject to Publication consultation from March 2025 and includes a commitment to 153 dwellings per annum towards unmet needs arising from the Black Country, however the total level of unmet needs to be met is not clear and it remains untested through Examination.

Conclusion on Unmet Needs

77. Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum, the shortfall is still significant. In addition, the level of committed contributions towards unmet needs has decreased.
78. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry in the Duty to Co-Operate Statement. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF.
79. Policy H1 1. should therefore be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country.



Policy H1: Housing Land Requirements – Housing Supply

Not sound

80. Policy H1 2. states the housing requirement is to be delivered in line with the trajectory set out in Appendix 3.
81. Appendix 3 includes a significant level of completions since 2021/22 (7,666 dwellings) and committed supply (13,975 dwellings). As set out in the accompanying Housing and Economic Land Availability Assessment (HELAA, November 2024), committed supply comprises sites under construction (3,545 dwellings), sites with detailed planning permission not commenced (4,970 dwellings), sites with outline planning permission not commenced (5,314 dwellings) and permitted development (146 dwellings).
82. The Council should ensure that committed supply is 'Developable' in line with the NPPF Glossary and set out a detailed trajectory illustrating expected delivery rates. This is particularly important for sites with outline planning permission not commenced, and on all sources of supply where there may be questions marks over deliverability or viability which need to be appropriately evidenced.
83. Notwithstanding this, it is noted that no account is taken of the likelihood that not all committed supply not started will come forward, with planning permissions inevitably expiring often due to unforeseen or a change in circumstances before they are commenced. No evidence is provided of historic lapse rates in the City, and an appropriate lapse rate needs to be applied to committed supply not started to ensure it is robust. A minimum 5% lapse rate is considered appropriate. Applying a 5% lapse rate to committed development not started would reduce the level of committed supply accounted for in the Plan to 13,454 dwellings.
84. Turning to 2017 Local Plan Allocations, it is noted that no progress has been made on H2:03 Walsgrave Hill Farm which is allocated and proposed to be carried forward for 900 dwellings. Indeed, the Council's own HELAA assessment of the site (HEN-002-24) raises deliverability concerns and suggests it is not available until 11+ years.



Given the lack of progress made on the site since it was allocated eight years ago and concerns raised in the HELAA, it is considered that this site is not Developable in line with the NPPF Glossary definition and should not be carried forward.

85. Similarly, H2:16 Land at Carlton Road (85 dwellings) has not been progressed since its allocation in 2017 and indeed is an existing industrial site with current occupiers. No evidence is provided with regard to future intentions of occupiers or the landowner. H2:19 Land at Mitchell Avenue (50 dwellings) has also not been progressed since its allocation in 2017, neither has H2:20 Land at Durbar Avenue (45 dwellings) or H2:22 Land at Jardine Crescent (25 dwellings). These sites should also be removed as carried forward allocations as not Developable in line with the NPPF Glossary.
86. It isn't clear how this is being accounted for in the HELAA, but in some cases sites are referenced in more than one element of supply, for example where a site is a carried forward allocation but also has consent. Clarity should be provided on this point, and the Council should ensure no sites are being double counted in the supply as a result.
87. Proposed new allocations are explored further in response to Draft Policy H2 Table 6.2 below. There are a number of proposed new allocations which aren't considered to meet the definition of Developable as set out in the NPPF Glossary, totalling 730 dwellings.
88. In addition to identified sites, the Plan is proposing to include in the overall supply a further 816 dwellings on 'other identified HELAA' sites and an additional 2,800 dwellings in windfall allowance. Justification for windfall allowance is provided in the HELAA which sets out that 200 dwellings per annum is considered appropriate, taking effect from 2027/28 to avoid double counting. This is justified on the basis of recent windfall delivery rates in the City.
89. NPPF Paragraph 72 is clear that compelling evidence is required to justify a windfall allowance, having regard to the HELAA, historic windfall delivery rates and expected future trends. The HELAA does not consider influences on future trends of windfall delivery in the City and therefore does not comply with NPPF Paragraph 72 in providing compelling evidence.



90. Given the lack of compelling evidence, it is considered that the proposed windfall allowance should be removed from anticipated supply. Furthermore, given there is no certainty around delivery of sites identified in the HELAA which are not allocated and do not have planning permission, including land availability and any significant infrastructure requirements or land remediation which means the sites cannot be viably delivered, this supply does not meet the definition of Developable as set out in the NPPF Glossary as should not be counted towards the CLPR supply as a result.

91. Notwithstanding this, it is considered likely that the inclusion of identified HELAA sites in addition to a windfall allowance is likely to be double counting, as inherently these identified HELAA sites would come forward as windfall development.

92. The implication of the above assessment is the Plan overestimates supply as follows:

	Plan Assessment	Marrons Assessment
Completions from 2024	315	315
Committed Supply	13,795	13,454
2017 Local Plan Allocations	2,733	1,628
Proposed New Allocations	3,503	2,773
Other Identified HELAA Sites	816	0
Windfall Allowance	2,800	0
Total Supply	23,962	18,170

93. The housing requirement will therefore not be delivered in line with the trajectory in Appendix 3, and Policy H1 is not positively prepared, justified, effective, or consistent with national policy.

94. Appendix 3 should be amended to ensure the Plan demonstrates the updated housing requirement in line with representations made above can be met with an appropriate buffer.

Policy H1: Housing Land Requirements – Five Year Supply

Not sound

95. Policy H1. and Appendix 3 is not consistent with national policy.



96. Appendix 3 sets out an annualised housing trajectory by category of supply, but no trajectory is provided which illustrates what the expected site-by-site breakdown of this is. As such, it is not possible to interrogate this in any detail. This is particularly important as the Plan will be required to demonstrate a Five-Year Housing Land Supply of deliverable sites at the point of Adoption (NPPF Paragraph 69 a)). It is noted that Appendix 3 provides the expected position as of 2024/25, but clearly the Plan will not be adopted during the 2024/25 monitoring year.
97. It is also noted there is a significant level of commitments with outline permission in the five-year period (taken from 2025/26 or 2026/27 as the base date), which are unlikely to meet the definition of Deliverable as set out in the NPPF Glossary unless clear evidence that housing completions will begin on site within five years is available. Without the site-by-site breakdown, it is not possible to conclude the Plan is consistent with national policy in paragraph 69 a).

Policy H2: Housing Allocations

Not sound

98. Policy H2 1. and Table 6.2 identifies the sites to be allocated for housing development. Sites H2:31 and H2:36 do not meet the definition of Developable as set out in the NPPF Glossary and should be removed.
99. H2:31 Paybody Building, Stoney Stanton Road is proposed for allocation for 280 dwellings. However, the Council's own HELAA assessment identifies that the site is a current NHS facility which is likely to become available for redevelopment for residential based use or healthcare based use. The narrative concludes that should the site become available, it is a suitable site for allocation. Given this uncertainty, there is not a reasonable prospect that the site will come forward for housing in the CLPR Plan Period, if at all.
100. H2:36 Land at Spon End is proposed for allocation for 750 dwellings. However, it is noted that this would be facilitated by the demolition of 450 existing dwellings. Thus,



the net increase of 300 dwellings should be accounted for, not the entire 750 dwellings as set out.

101. Table 6.2 should be amended to remove H2:31 and amend the total dwelling column for H2:36 to 300 dwellings.

102. **Policy H2: Housing Allocations – H2:1 Keresley SUE**

Not sound

103. Policy H2:1 and Table 6.2 re-allocates the Keresley SUE for 3,100 dwellings to be completed within the Plan period. The policy is however not justified as there is more capacity within the allocation than 3,100 dwellings.

104. The Housing and Economic Land Availability Assessment (HELAA) (November 2024) confirms that as of 30th September 2024, circa 2,500 dwellings have been granted planning permission, with circa 600 dwellings remaining to come forward. As at February 2025, the approval of schemes FUL/2020/0748 (for 388 dwellings) and PL/2023/0001155/OUTM (for up to 40 dwellings) has meant that now circa 2,920 dwellings have planning permission with circa 180 dwellings remaining to come forward.

105. The total dwelling capacity has been informed by the Urban Extension Design Guide SPD (2019), which includes an indicative masterplan of the SUE which identifies development boundaries. The remaining land within these development boundaries that does not already have planning permission includes land currently used for sports pitches (Coventry Colliery and Keresley Sports and Social Club), and a golf driving range (John Reay Golf Centre). There is no evidence to that these sites have been put forward through the call for sites, or that they are likely to become available during the Plan period. It is unclear therefore whether the 3,100 dwellings can be met based on the indicative masterplan within the SPD.

106. However, Richborough are promoting land off Fivefield Road (HELAA Ref: BAB-012-24) which is located within the Keresley SUE for circa 350 dwellings. The land is identified as Openspace/Visual Amenity Space on the indicative masterplan within the



SPD and therefore has not contributed towards delivering the 3,100 dwellings or higher figure that now is required to address shortfalls in supply to meet the requirement.

107. The land is not publicly accessible, save for one footpath around the edge of the site. The land also falls adjacent to residential development under construction to the south and has limited visual amenity. There are no opportunities for sport or recreation as the land is in active agricultural use, and there are no proposals as part of the development of the allocation for the land to be brought into use as openspace. Its public value is therefore limited to certain parts of the site around the edge and these areas of value can be maintained and enhanced through careful masterplanning at the application stage.

108. There is no policy basis for the land to be open space. Applying the Council's Open Space SPD, the permitted 2,927 dwellings will produce 7,025 people (2.4 per dwelling) indicating a minimum Green Space requirement of 23.39 ha. However, the approved developments will provide 41.94 ha of Green Space as illustrated in the table below. Furthermore, the sites key open space assets, including Hounds Hill and the ponds across the site, will be maintained and enhanced to provide high quality, accessible green space thus further enhancing provision.



Site Name	Site Ref	Developer	Dwellings	Open Space (ha)
Fivefield Road & Tamworth Road	OUT/2019/0022 RMM/2022/0679 RMM/2022/0633 RMM/2022/0636 RMM/2022/0678	Bellway Homes	550	10
Penny Park Lane & Bennetts Road	FUL/2020/0748	David Wilson Homes	388	6.825
Sandpits Lane, Bennetts Road & Tamworth Road	OUT/2014/2282 RMM/2019/1030 RM/2020/2399	Lioncourt	800	12.6
Thompsons Road & Bennetts Road North	OUT/2019/0484 RMM/2022/2615 RMM/2022/1982	Lioncourt	500	5.7
Watery Lane-south	OUT/2019/2277 RMM/2021/0314	J G Gray Limited, Gillitt Properties Limited & The Newcombe Estates Company Limited	40	0.2375
Land West of Bennetts Road South	OUT/2022/0713 & PL/2024/0000246/RESM	Richborough Vistry	260	1.82
Land between Fivefield Road	OUT/2022/0712 & PL/2023/0001888/RESM	Richborough Countryside Partnerships	290	4.31
Hall Hill Cottage Fivefield Road	PL/2023/0001155/OUTM	Seven Homes	40	No specific area- 0.21ha at 15% of total site area
Bennetts Road, Coventry	FUL/2020/2615	Partner Construction	56	No specific area – 0.24 ha at 15% of total site area
		Totals	2,927	41.94ha

109. The land is free from environmental constraints that would prevent its residential development. NPPF Chapter 11 promotes the effective use of land in meeting the need for homes and encourages optimising densities in sustainable locations. It is



appropriate therefore for the capacity of the Keresley SUE in Table 6.2 to be increased to reflect the land available off Fivefield Road.

110. Appendix 1 of the SPD states “as the SUE evolves through the planning process and development stages, this Indicative Masterplan will be updated to reflect approvals and delivery.” The indicative masterplan should therefore be updated to reflect the need for additional housing, and the availability of the land for development.
111. Along with being a suitable site, the Land off Fivefield Road is both achievable and deliverable. Richborough has a proven track record of successful delivery within the Keresley SUE, evidenced through the OUT/2022/0713 and OUT/2022/0712 sites contributing 550 dwellings towards Coventry’s housing supply, reinforcing the achievability of the Fivefield Road site. Works have already begun on preparing a planning application, demonstrating clear intent for delivery.
112. Policy H2:1 and Table 6.2 should be amended to increase the allocated capacity of the Keresley SUE (H2:1) to reflect the availability and suitability of land off Fivefield Road (HELAA Ref: BAB-012-24). The Council will also need to consider updating its Urban Extension Design Guide SPD.