
COVENTRY PLAN: HOUSING

REGULATION 19 CONSULTATION REPORT

For Keep Our Greenbelt Green (KOGG)

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Feb 2025

1. Introduction

1.1 My name is Gerald Kells. I am a Policy and Campaign Advisor. I have advised a number of organisations and local groups on Local Plans. I was the West Midlands Regional Policy Officer of CPRE for over ten years.

1.2 I was asked by Keep Our Greenbelt Green (KOGG) to review the evidence underpinning housing need and supply in Coventry to inform their response to the questions set out in the Regulation 19 Consultation for the Coventry Local.

1.3 My conclusions may also have implications for comments their members may want to make on the South Warwickshire Plan (which I have not considered in detail), notably proposals in the SWDP Preferred Option for sites SGO1-3 adjacent to Coventry.

1.4 To do this I have principally considered the Plan itself alongside the updated Economic Development Needs Assessment for Coventry and Warwickshire (November 2022 HEDNA) as well as the Review of Coventry's Local Housing Need (June 2024) and the Housing and Economic Land Availability Assessment (Nov 2024).

1.5 On the basis on my work, there would be an excess of housing supply of 7,933 which would allow allocations to be reviewed which failed other elements of the NPPF sustainability requirements.

1.6 In terms of 5-year land supply there is currently at least 5.6 years supply and I do not see why that is at risk under the New Standard Methodology.

2. Housing

2.1 Need

2.1.1 The housing need set out in the Consultation Plan is based on the HEDNA figure of 1,455 dwellings per annum (dpa). Para 6.9 sets out that there are exceptional circumstances which justifies not using the Standard Methodology (SM).

2.1.2 The Plan is dated December 2024 so this approach was relevant then since the HEDNA figure was considerably lower than the existing SM methodology at the time.

2.1.3 The situation has changed dramatically because, unlike many authorities, including all the other Warwickshire Authorities, the new methodology (issued by MHCVLG in December 2024) reduces the housing need in Coventry below the HEDNA figure, removing the need for exceptional circumstances to be shown.

2.1.4 At the same time 1,592 dpa are added by the New Methodology to the other Warwickshire Authorities, most of whom will have difficulty meeting those new figures. In particular, Stratford-on-Avon and North Warwick have seen increases of over 100%.

2.1.5 In other words, to continue starting from the old Standard Methodology calculation, (even accepting that approach was permissible under the NPPF transitional arrangements,) would be patently absurd as it would involve substantial double-counting of housing need.

2.1.6 The question is whether the addition to the New Standard Methodology is still justified.

a. New Standard Methodology Calculation

2.1.7 The New Standard Methodology calculation of housing need (abbreviated as 'NSM' in this report) for Coventry are set out in Table 1, as well as the same calculation using the old methodology.

2.1.8 They are also compared with the figure for the rest of Warwickshire.

Dwellings per Annum	0.8% of Stock	Affordability Adjustment (based on 5 year average 2019-2023, 5.96)	Affordability %	New Standard Methodology	Old Standard Methodology (ONS 2014) Including 35% Coventry add-on
Coventry	1174	214	18.24	1388	3082 (2,283 without uplift)
Warwickshire ¹	2206	1701	77.09	3907	2315

Table 1: Dwellings per annum (DPA), Standard Methodology, Coventry and Warwickshire

2.1.9 I also note that the Housing Topic Paper quotes the NSM as 1527 dpa for Coventry. This was based on the calculation in the July 2024 consultation version of the NPPF not the lower 1388 figure in the final version (Dec 2024).

2.1.10 While a general criticism of the NSM is that it is not based on household need but on the use of Stock as a proxy, which is then heavily adjusted by an increased affordability add-on, in this case there is strong reason to believe that the old standard methodology, even without the arbitrary 35% add on, heavily over-estimated housing need in Coventry.

2.1.11 This was clearly evident in the 2021 CENSUS data, (albeit that remains interim.) Comparisons with the ONS figures for 2021 are given in Table 2.

2.1.12 These suggest that both the population and households in all the ONS projections were heavily over-estimated for Coventry, something that would then be accentuated in future projections.

2.1.13 They show a particularly stark divergence and, while some impacts may be COVID-related, it is likely to also reflect particular issues with ONS population projections in areas such as Coventry where there are problems related to student numbers (for example, students not de-registering at GPs.)

2.1.14 Fundamentally it suggests that the Old Standard Methodology is a poor reflection of housing need in Coventry. Moreover, it no longer needs be applied, given that the NSM is now available, and if the old methodology were applied would, in practice, lead to serious double-counting of housing need.

¹ All Warwickshire Authorities excluding Coventry

Coventry	2021 Census Population	Projections for year 2021 in ONS SNPPs and SNHPs	Difference between ONS projections for 2021 and Census 2021	Difference as % of Census
2014ONS	345,300	383,200	38,520	11.16%
2016ONS	345,300	382,300	37,000	10.72%
2018ONS	345,300	374,500	29,250	8.48%
	2021 Census Households			
2014ONS	134,100	151,161	17,061	12.72%
2016ONS	134,100	151,089	16,989	12.67%
2018ONS	134,100	152,730	18,630	13.89%

Table 2: ONS and CENSUS Results, Coventry

b. Housing and Economic Development Needs Assessment (HEDNA)

2.1.15 Given that the NSM is now lower than the HEDNA figure given in the Plan by 67 dpa (amounting to 1,340 homes over the plan period) it is worth considering how the HEDNA figure was justified.

2.1.16 The HEDNA (November 2022) considered all the authorities in Coventry and Warwickshire and remains the basis for housing need in the Regulation 19 Plan.

2.1.17 Table 51 of the HEDNA set out the SM result and gave a figure of 3,188 dpa for Coventry, (higher than the more up-to-date 3,082) but of a similar order.

2.1.18 It then went on to consider whether an alternative approach was justified. This was based on the extant Planning Practice Guidance which allowed for a lower housing need figure than the standard method, provided the strategic policy-making authority could demonstrate, using robust evidence, that the figure was based on realistic assumptions of demographic growth and that there were exceptional local circumstances that justified deviating from the standard method.

2.1.19 That provision no longer exists. Instead, the current NPPG is vaguer and does not warrant a figure lower than the New Standard Methodology².

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2.1.20 The current NPPG also says that this figure should be under review, but once the plan is submitted can be relied upon for 2 years³.

2.1.21 The HEDNA suggest two reasons for an alternative approach to the then SM being taken.

Firstly, that demographic data on which projections are based is demonstrably wrong and cannot realistically be used for trend-based projections on which the Standard Method is based; and

Secondly, that demographic trends have changed so much that it is unrealistic to use a set of projections based on information in a trend period to 2014, which is now over 8-years old.

2.1.22 Clearly, neither of these reasons now apply.

2.1.23 The HEDNA considered that both of these criteria were met, and particularly so in Coventry where there had been long-standing criticism of ONS housing need figures, which was supported by a variety of evidence, including age structure, dwelling growth stock and the electoral register.

2.1.24 The justification for this was then set out in some detail. The HEDNA argued that the population and household estimates in Coventry were in doubt, with the CENSUS confirming the over-estimation, but as yet with no official data correcting this. (paras 5.46-5.47).

If authorities use a different method how will this be tested at examination?

The standard method should be used to assess housing needs. However, in the specific circumstances where an alternative approach could be justified, such as those explained at paragraph 014, consideration will be given to whether it provides the basis for a plan that is positively prepared, taking into account the information available on existing levels of housing stock and housing affordability.

Paragraph: 015 Reference ID: 2a-015-20241212

3

When should strategic policy-making authorities assess their housing need figure for policy-making purposes?

Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate. The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities. However, local housing need calculated using the standard method may be relied upon for plan making for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination

Paragraph: 008 Reference ID: 2a-008-20241212

2.1.25 The HEDNA went on to suggest what the correct figure might be for population growth in Coventry based on dwelling completions and on the patient register. This approach still had potential flaws. In terms of dwellings there might be complicating factors, such as vacancy rates, and in terms of the patient register, an ongoing criticism is that patients do not deregister with GPs on leaving the area, particularly students completing courses, so continue to be counted as resident.

2.1.26 Both methods suggested an actual population of around 347,000 in 2020, rather than 379,387. This led to a different age structure with a much shallower peak in the early twenties which was more comparable with similar areas and so may compensate appropriately for the overcalculation of students. (Fig 5.17)

2.1.27 The HEDNA went on to follow a similar procedure for the other Warwickshire Districts on the assumption that the undercalculation of population in Coventry may have partially resulted from migration to those areas. This accounts for some 8,200 people, leaving a residual short fall across the HMA of 24,160.

2.1.28 This result was then compared with the CENSUS results and that comparison was set out in Table 5.20. The Icen approach turned out to be much closer to the CENSUS than the ONS projections.

2.1.29 They went on to acknowledge that there were particular issues with the CENSUS in Warwick and Coventry, where students may not have been at the University because of the pandemic. Their discussion with the Universities confirmed the possibility of this, but of course, that may conversely create some over-estimates of population in the areas students come from if they have been counted as living in those areas instead.

c. HEDNA Trend Based Analysis

2.1.30 Having concluded that the current population of Coventry and Warwickshire was miscalculated the HEDNA developed its alternative 'trend-based' projection which adjusted fertility, death rates and migration based on trend assumptions across the HMA to establish an alternative projection for housing. These were based on comparison of the 2011 and 2021 Censuses.

2.1.31 In terms of fertility and death rates (natural growth), these were assumed to be measured accurately. However, if the population was actually smaller (as in Coventry) the % rates must be commensurately higher and these were set out.

Migration

2.1.32 In terms of migration, they assumed that since births and deaths are correctly recorded then migration must not be. To correct this, they adjust the migration rates to reflect the population discrepancy and, because they have to make an assumption, split this evenly between in and out migration.

2.1.33 In Coventry's case that amounted to 4,000 persons per year (2,000 in and 2,000 out) and net migration was reduced by that amount between the Censuses.

2.1.34 These new trends were then applied to their base year (which is the 2021 CENSUS).

2.1.35 Looking forwards, future migration was modelled by taking a midpoint between future national population trends and trends from 2020-2030. The latter was likely to involve higher net in-migration and it would perhaps have been helpful to have included an alternative scenario based purely on future trends.

2.1.36 While this approach seemed logically sound, there was a clear problem with it. The previous over-estimation of population in Coventry and across the county as a whole would have influenced the level of development over 2010-2020 (including through the duty-to-cooperate) and so, logically, would have led to increased housing provision in some areas, especially those which were more affluent.

2.1.37 That would have facilitated migration into those districts, and in particular moves out of Coventry.

Households

2.1.38 The last element of the HEDNA calculation was to turn population into households. The approach of the HEDNA was twofold. Firstly, Icenii adjusted the base level households to match up with housing completions data because, as they explain, completions exceeded the growth in households between the two Censuses.

2.1.39 The second element was to return household representative rates (the measure that determines household size) to the HRRs used in the ONS2014 figures.

2.1.40 The logic of the HEDNA was set out in paragraphs 5.142-5.143. The assumption was that, because the more recent figures were assumed to include suppression of household formation, a return to previous rates of formation, particularly in the 25-34 age range, should be expected as we move forwards.

2.1.41 The HEDNA referred to widespread criticism of the ONS2016 and ONS2018 figures on this basis. But the slowing down in household formation may actually reflect long-term changes which are driven by fiscal and societal factors (especially since the 2008 financial crash) which will remain in force into the future.

2.1.42 It is not clear from the HEDNA exactly what the exact numerical impact of adopting these two assumptions was, although, clearly, both would have increased projected housing need.

2.1.43 The demographic results and the SM re-calculation were given in Tables 5.32 and 5.33, although it is acknowledged in Para 5.148 that there is a strong interaction between the Coventry and the Warwickshire districts around the city. In other words, the distribution of need will itself influence where population goes and households form.

2.1.44 Table 3.1 of the HEDNA Summary compared the Overall SM Housing Need based on the HEDNA trend-based analysis with the ONS2014 figures including Coventry's 35% 'urban uplift'. This table showed considerably lower need in Coventry but increases in Rugby, Stratford and Warwick.

Table 3.1 Overall Housing Need (dpa)

	Coventry	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	HMA
2014-based	3,188	176	435	516	564	675	5,554
Trend-based	1,964	119	409	735	868	811	4,906

2.1.45 The demographic need under the ICENI assumptions was set out in more detail in Table 5.32 and the then-applicable standard method (SM) calculation based on those figures is set out in Table 5.33.

Table 5.32 Projected change in households – remodelled projection

	Households 2022	Households 2032	Change in households	Per annum
Coventry	141,244	154,202	12,958	1,296
North Warwickshire	27,709	28,653	944	94
Nuneaton & Bedworth	57,302	60,618	3,316	332
Rugby	48,232	54,269	6,037	604
Stratford-on-Avon	61,131	67,271	6,140	614
Warwick	65,503	71,215	5,712	571
Coventry-Warwickshire	401,120	436,228	35,108	3,511

Source: Demographic projections

Table 5.33 Standard Method Housing Need Calculations using revised demographic projections

	Coventry	North Warwks	Nuneaton & Bedworth	Rugby	Stratford- on-Avon	Warwick	C & W
Households 2022	141,244	27,709	57,302	48,232	61,131	65,503	401,120
Households 2032	154,202	28,653	60,618	54,269	67,271	71,215	436,228
Change in households	12,958	944	3,316	6,037	6,140	5,712	35,108
Per annum change	1,296	94	332	604	614	571	3,511
Affordability ratio (2021)	5.96	8.23	7.73	7.47	10.62	10.73	
Uplift to household growth	12%	26%	23%	22%	41%	42%	
Initial need (per annum)	1,455	119	409	735	868	811	4,397
Capped	1,455	119	409	735	868	811	4,397
Urban uplift	35%	0%	0%	0%	0%	0%	
Total need (per annum)	1,964	119	409	735	868	811	4,906

Source: Derived from a range of ONS and MHCLG sources

2.1.46 The resulting figure of 1,964 dpa for Coventry was, of course, itself above the Plan figure of 1,455 dpa. It appears the Plan figure is based on the 1,296 figure with a 12% additional allowance.

2.1.47 That is to say Coventry was (at the time) excluding the 35% increase as an arbitrary addition. This point is further reflected in Policy DS2 which only refers to meeting the needs set out in DS1 i.e. the 1,455 dpa.

2.1.48 Since the HEDNA was completed Coventry published a review of their Housing Need in June 2024, but still with the old SM in play⁴.

2.1.49 Notably in that ICENI considered the Unattributable Population Change (UPC), the discrepancy between ONS forecasts and the CENSUS, and conclude that this did not suggest students leaving the city had not been properly captured (Para 4.19) something underlined by the age structure of the population (4.25).

2.1.50 Indeed, other evidence such as Patient Data suggested there may have been some uplift in population in 2021/2022 but not to the degree suggested by ONS.

2.1.51 A dip in affordability since 2022 had reduced the HEDNA SM calculation marginally to 1,921 dpa as set out in Table 5.3 of the Update. This should have reduced the annual plan figure to 1,423, but Coventry have not adopted that figure (which would have reduced their overall plan need to 28,460) and 1,455 remains the basis for the Plan.

⁴ Review of Coventry's Housing Need (June 2024)

Table 5.3 Housing Need Calculations – 2021 and 2023 Affordability Ratio

	2021 Affordability Ratio	2023 Affordability Ratio
Households, 2022	141,244	141,244
Households, 2032	154,202	154,202
Change in Households	12,958	12,958
Annual Change in H'holds	1,296	1,296
Affordability Ratio	5.96	5.57
Affordability Uplift	12%	9.8%
Stage 2 Housing Need	1,455	1,423
Cities' Uplift	35%	35%
Local Housing Need	1,964	1,921

2.1.52 Also, it is worth pointing out that Comparing Table 5.33 with the NSM for the individual Warwickshire Districts (excluding Coventry), shows that the New Methodology would result in 965 dpa more homes (3,907-2,942) than the HEDNA figures in those authorities (See Table 3).

Dwellings per Annum	0.8% of Stock	Affordability Adjustment (5 year average 2019-23, 5.96)	New Standard Methodology	Old Standard Methodology (ONS 2014)	State of Local Plan
Coventry	1174	214	1388	3082 (2,283 excluding 35% urban uplift)	Reg 19 Consultation Jan-March 2025
North Warwickshire	236	128	364	163	Pre-Issues and Options
Nuneaton and Bedworth	484	253	737	421	Modifications Post-Examination
Rugby	410	208	618	525	Issues and Options done, Reg 18 March 2025
Stratford on Avon	532	594	1,126	553	South Warwickshire Reg 18 Plan, Jan-March 2025
Warwick	545	517	1,062	653	South Warwickshire Reg 18 Plan, Jan-March 2025

Table 3: New Standard Methodology, all Warwickshire Authorities

2.1.53 None of the other local authorities, apart from Nuneaton and Bedworth, have reached the Regulation 19 Stage of the Plan so all would be required to adopt the NSM.

2.1.54 Furthermore, as Para 236⁵ of the NPPF explains, Nuneaton and Bedworth will need to immediately review its plan after adoption using the NSM because their Plan Figure of 545dpa is only 74% of the New Standard Methodology figure.

d. Conclusions on Need

2.1.55 The need figure in the Plan of 1,455 exceeds the 1,388 required by the New Standard Methodology. However, because the plan is at Regulation 19 Stage it could be progressed under the old regime.

2.1.56 The figure would then fall short of the Standard Methodology and, even if the case for exceptional circumstances were accepted, the Plan figure would not include the 35% cities uplift, required under the previous NPPF, (although it could be argued that the uplift is now redundant.)

2.1.57 However, to continue using the old SM would also be fundamentally illogical because all the Warwickshire Councils around Coventry would now (or shortly) be required to adopt very much higher housing figures, leading to a massive amount of double-counting.

2.1.58 In my view the plan should, therefore, be submitted with the NSM figure of 1,388 which would then be valid for the next 2 years during examination, and would amount to 27,760 dwellings for the whole Plan period.

2.2 Supply

2.2.1 The components of housing supply are set out in Table 6.1 of the Plan. These are based on the Table 5 of the HELAA (Nov 2024). Table 6 of the HELAA removes those dwellings completed up 30 Sept 2024 and this leaves 23,827 still to be built. This obviously does not include those sites which are only Safeguarded in the Plan (In Policy GB2).

⁵ Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need⁸⁵ the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need

Table 6.1 Components of housing supply 2021-2041

Housing Land Supply Components (data to 30/9/24)	Number of Homes
Past net completions	7,666
Committed supply	13,975
Remaining allocations (2017 Local Plan)	2,733
Proposed new site allocations (local plan review)	3,503
Other identified sites (HELAA)	816
Windfall allowance	2,800
Total	31,493

2.2.2 Table 6.2 includes a list of new sites allocated for development in the Plan, which amount in total to 15,934 units. Since some of these include existing consents it is not easy to correlate this with Table 6.1.

2.2.3 Table 6 of the HELAA, shows the total supply excluding completions showing there would be an on-going capacity of 23,827 (as of 30 Sept 2024).

2.2.4 The HELAA includes a list of all sites identified, including those discounted for various reasons. I have assumed the calculations in the HELAA are correct.

2.2.5 However, I now consider three specific aspects which could increase that supply.

2.2.6 The first is densities, the second windfalls, the third student accommodation.

a. Densities

2.2.7 The density assumptions are set out in Para 3.44 of the HELAA. Where densities are not informed by a planning application these are based on the densities in either the existing plan or the emerging plan. Policy H9 of the existing Local Plan specifies minimum densities of 200 dpa inside the ring road, 35 dpa outside and 30 dpa on greenfield sites.

2.2.8 Policy H9 in the Regulation 19 Plan increases those densities to:

- Greenfield sites - 35 dwellings per hectare (net).
- Brownfield sites 45 dwellings per hectare (net).
- Sites within the City Centre Transition Zone 125 dwellings per hectare (net).
- Development within the defined City Centre boundary 250 dwellings per hectare (net).

2.2.9 The introduction of the 'transition zone' is, we are told to avoid a sharp difference at the City Centre boundary and is informed, as are the higher density figures, by the Residential Density Study of Oct 2024, which concluded that densities from 2017-2023 had often exceeded the minimum in H9.

2.2.10 The higher densities will have been partly because of the welcome H9 wording, maintained in the new Plan, that '*Residential development, including conversions, must make the most effective and efficient use of land.*' It will also result from the natural incentive to maximise the profitability of a development.

2.2.11 In coming to a view on the density of sites without a planning application the SHELAA relies on the capacity assumptions of the two plans. It is not entirely clear how the plan to be used on a particular site was decided, and it may well be that sites identified under the previous plan could still be built at densities consistent with the new plan.

2.2.12 A further intervention was where site capacity '*did not align with the site calculations*'. Here officers assessed capacity with known constraints and local site characteristics. The wording suggests this was mainly sites which were unlikely to meet the minimum density requirement for justifiable reasons.

2.2.13 What is clear from this is that there may well be sites, particularly in the urban core, which exceed the minimum densities, and so could provide additional capacity.

2.2.14 This, however, is not easy to quantify (without examining each site in detail). The new H9 certainly represents a welcome update of the Policy, provided it is fully informed by strong design criteria.

2.2.15 I conclude that there may be additional capacity from density under-estimates, but it is hard to quantify that.

b. Windfalls

2.2.16 The windfall allowance is for an additional 200 dpa, accounting for 2800 dwellings over the plan period. These start from 2027/2028 because windfalls prior to that are assumed to be in the system, as is usual.

2.2.17 The evidence of windfalls is necessarily informed by historic trends, as future windfalls are by their nature unknown.

2.2.18 However, it is also worth noting that there are a number of factors which would facilitate future windfalls, including the change to rules on usage-changes, city-centre and retail changes.

2.2.19 The introduction of the 'Transitional Zone' may well also increase windfall yields as it would allow higher density windfalls in that area.

2.2.20 Indeed, the dynamics of windfall supply is acknowledged in the HELAA (Para 3.54-3.55):

While every effort is made to identify development sites as part of the Local Planning Authority's desktop process, in an urban area the size of Coventry, there will be a continual supply of land and buildings reaching the end of their useful life in their current use in the short, medium and long term that the Local Authority wouldn't be able to identify or predict. This might result in simply changing the use that could include the whole site or part of the site, such as an upper floor(s) above a commercial premises or shop or subdivision of existing houses.

Sites which come forward as permitted development change of use are also effectively windfall sites where these have not previously been identified.

2.2.21 There may even be sites that the Council is already aware of but cannot currently identify as allocations⁶. One example in the HELAA is the inner city site at Croft Road/Spon Street (HELAA Site Ref: STM-016-24) which is currently used for leisure purposes.

2.2.22 This was discounted in the HELAA not because it was unsuitable but 'due to lack of submitted information as part of call for sites process'. With an assessed capacity of 725 it could provide a significant addition to the housing supply, whether as a mixed use or wholly housing site.

2.2.23 There is certainly qualitative evidence for future windfalls, but the best way to estimate the quantity is to consider historic trends as the current NPPF requires in Para 74⁷. This would include both small and large sites, as explained in the NPPF Glossary⁸.

2.2.24 Table 4 of the HELAA sets out the windfall position over the last 3 years, both consents and completions. It is generally accepted that completions are a better measure as this allows for failure of permissions.

⁶ This problem was recently highlighted at the Shropshire Plan Examination, where sites were identified as potential windfalls which could not be allocated, and while this showed the potential for further windfalls, questions were raised as to why they were not allocated.

⁷ *Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area*

⁸ **Windfall sites:** *Sites not specifically identified in the development plan.*

Table 4 Completions and planning consents on windfall sites 2021-24

Monitoring year	Homes consented			Homes completed		
	Resi	PBSA	Total	Resi	PBSA	Total
2021/22	344	7	351	224	761	985
2022/23	662	637	1,299	361	673	1,034
2023/24	762	805	1,567	572	-13	559
Total	1,768	1,449	3,217	1,157	1,421	2,578
Average p/a	589	483	1,072	386	474	859

'Resi' = Residential. All figures are net. Communal accommodation is included as a 'dwelling equivalent' figure derived from the Government's housing delivery test, which converts additional bedrooms to equivalent dwellings using the ratios: 2.5:1 for PBSA and 1.8:1 for other communal accommodation such as HMOs and care homes.

2.2.25 This period is relatively short (5 or 10 years is often used) and no figures are given for the preceding years. The Annual Monitoring Reports include figures for 2017-2021 (Set out in Table 4), but the AMR figures for both 2021/22 (272) and 2022/23 (393) are slightly higher than the HELAA. This, the Council has told us, is because the AMR used estimates that were later reduced downwards.

2.2.26 The previous AMR windfall figures are set out in Table 4 below.

AMR	Windfalls Delivered	PBSA
2020/21	58	16
2019/20	670	332
2018/19	451	820
2017/18	688	0

Table 4: AMR Windfall and PBSA evidence 2017-2021

2.2.27 The 2020/21 year is clearly as aberration, probably because of the pandemic, and the following 2 years may also have been impacted by the ensuing economic downturn. However, taking an average of the six year's completions, and excluding 2020/21, gives a revised average of 494 dpa, although this may be slightly less if the final figures are used for 2017-2020.

2.2.28 Leaving aside the issue of Student Accommodation, this suggests to me that the average of 386 dpa for residential dwellings in the HELAA is overly pessimistic and the prospect of windfalls is much rosier. Indeed, the authors themselves admit that empirical evidence confirms the actual figure is much higher (Para 3.75⁹).

⁹ 'Although Coventry's windfall allowance has been set at 200 dwellings per year, empirical evidence confirms the actual figure is much higher.'

2.2.29 The HELAA's justification for the choice of the 200 dpa figure (Para 3.76) is that this gives leeway for permissions to lapse or implementation be delayed. I cannot see the justification for this. The former issue is accounted for with the use of completions and the later would have a diminishing impact as the plan progressed.

2.2.30 This is especially true since, while the Plan as written does not explicitly encourage windfall development, Policy H3 (similar to the existing plan) sets out criteria for judging unallocated housing sites which would continue to allow for windfalls as long as they are in line with the Plan's policy goals.

2.2.31 This is further underpinned by Para 73d of the NPPF which requires authorities to support the development of windfall sites.¹⁰

2.2.32 In my view, it would be reasonable, discounting the pandemic year, to allow for 400 dpa to come forward as windfalls. This would double the allowance from 2,800 to 5,600 over the Plan period.

2.2.33 It can be anticipated that there would be objections to this on behalf of developers, who routinely complain about an over-reliance on windfalls and say such an approach is no longer plan-led.

2.2.34 However, even when adding this capacity to the total, allocated sites would still account for approximately 84% of supply, (79% if one excludes completions to 30 Sept 2024).

2.2.35 Moreover, Policy H3 seeks to ensure all planning permissions are determined using principles in line with the plan so the Plan-led approach would still apply to windfalls.

2.2.36 And, even if that were not the case, reducing the windfall allowance would not reduce the incidence of windfalls, so in practice they do not make the Plan any less Plan-led.

c. Student Accommodation

2.2.37 The third issue is student accommodation and the extent to which it might contribute to housing supply.

2.2.38 In terms of Purpose-Built Student Accommodation (PBSA) the HELAA identifies (para 3.82) a supply of 6,918 dwelling equivalents, of which 4,218 are previous completions and 2,700 future completions.

¹⁰ support the development of windfall sites through their policies and decisions - giving great weight to the benefits of using suitable sites within existing settlements for homes.

2.2.39 Of the PBSA completions up to 30 Sept 2024, 1,421 were on windfall sites according to Table 4 of the HELAA (474 per annum), which suggests 33% of the total PBSA completions.

2.2.40 Going forward, it is not possible from the HELAA information to fully identify the 2,700 future completions, so I assume those are all on allocated sites. The future windfall provision is solely based on residential windfall figures.

2.2.41 In other words, one might expect further windfalls to come forward as PBSAs. At a continued average of 400 a year, this would add 2,800 homes to the supply. Using the 2.5:1 ratio in the HELAA this would equate to 7,000 beds, 13,750 beds when added to the identified future allocated sites. At a lower average of 200 a year it would amount to 1,400 homes extra or 10,250 beds in total.

2.2.42 I note that two of the discounted HELAA sites were for student accommodation, CEL House (Site Ref: WES-003-24) and Spectra House, Westwood Way and 8 Torwood Close (Site Ref: WES-008-24). Both are close to Warwick University but on existing industrial sites. Between them they would accommodate 1,000 beds which suggests there is potential for PBSA windfalls to come forwards subject to planning constraints.

2.2.43 The evidence of need for addition PSBA accommodation in Coventry is also underlined in the recent Progress House appeal decision¹¹, which states:

The evidence before me indicates that there is limited purpose-built student accommodation within easy reach of Warwick University. In addition, the Council's emerging Homes in Multiple Occupation (HMO) Development Plan Document highlights issues that have occurred owing to the number of HMOs in the city and identifies that a large proportion of HMOs are occupied by students. Therefore, the development would seek to address these points. In consequence, I am persuaded that there is sufficient need for the appeal scheme.

2.2.44 This is underlined in Policy H10 (2) where there is a positive approach to providing further student accommodation where need is demonstrated (presumably on additional i.e. windfall sites).

2.2.45 In terms of the number of students who could potentially live in new PBSA accommodation, HESA reports 12,305 students at Coventry University and 7765 at Warwick University lived in 2023 in 'Other Rented Accommodation', a total of 20,070(See Appendix 1)¹².

¹¹ Appeal Decision 8 March 2024 Appeal Ref: APP/U4610/W/23/3328984, Progress House, Westwood Way, Coventry CV4 8JQ, Para 25

¹² The data on where students live from HESA Table 57: <https://www.hesa.ac.uk/data-and-analysis/students/table-57>

2.2.46 Some Warwick University students may live in Leamington Spa or other nearby towns, but it is reasonable to assume most live in Coventry.

2.2.47 Another 3,825 are identified as in 'other' accommodation and 2,155 not known and 6,580 are in the parental/guardian home (See Appendix 1)¹³.

2.2.48 One would expect that the majority of students who live in new PBSAs would otherwise live in rented accommodation in Coventry, although a few may come from the other categories. Equally, one has to allow for the fact that some students will prefer to live in rented accommodation.

2.2.49 The new PBSA provision will also not all replace rented accommodation if student number increase. It may also be impacted by the current downturn in International Student numbers.

2.2.50 Overall, it seems to me there is likely to remain an appetite for such schemes, which will facilitate windfall PBSA provision. However, over time as more accommodation is built that may reduce, especially if student numbers remain static.

2.2.51 For the purposes of the Plan and on the evidence currently available, a windfall PBSA allowance of 200 dpa would seem to me reasonable.

d. Other Supply Issues

2.2.52 I have not considered any other aspects of supply which might increase capacity, for example reducing empty homes. It may be there is some more capacity that could be identified but I have no evidence to suggest it would have a major impact.

e. Conclusions on supply

2.2.53 I have not examined all aspects of Supply but it seems to me there is likely to be some additional capacity from increased density (above the Plan's minimum) and there may be other increases from policies, such as reducing vacancies but these are hard to quantify.

2.2.54 Based on the qualitative and quantitative (historic trends) evidence I consider a windfall allowance of 400 dpa fulfils the NPPF test of compelling evidence. This would add 2,800 dwellings to the supply over the Plan Period.

2.2.55 I also consider there is both qualitative and quantitative evidence of future PBSA windfalls and a reasonable allowance would be 200 dwelling equivalents per

¹³ The data on where students live from HESA Table 57: <https://www.hesa.ac.uk/data-and-analysis/students/table-57>

annum, adding a further 1,400 dwellings to the supply over the Plan Period (i.e. houses released from being student accommodation.)

2.3 Conclusions on Housing Need and Supply

2.3.1 Using the NSM, 27,760 dwellings would be required over the Plan Period. 31,493 dwellings are identified in the Plan but in my view that should be increased by 4,200 based on the evidence on Supply, making 35,693 dwellings. This leaves an excess supply of 7,933 dwellings.

3. Implications for Allocations and Safeguarded Land

3.1 These conclusion on housing need and supply would have implications for more detailed policies. The additional supply could allow for allocations which failed other tests, such as sustainability or Green Belt location, to be deleted from the Plan.

3.2 Where sites include an element of employment land, this may have implications for employment provision and that is something I have not specifically considered.

3.3 At the same time the numerical justification for safeguarding land adjacent to the Warwick District boundary would be removed, potentially making Policy GB2 unsound.

3.4 Moreover, if sites in South Warwickshire adjacent to Coventry (SG01-03) were removed, including on the basis that Coventry is providing adequately for its own needs, this would further remove the justification for GB2.

4. Five Year Land Supply

4.1 In terms of Five Year Land Supply the Progress House Appeal Decision (para 22) refers to a 1.83 year housing supply, but that was calculated using the old standard methodology so is no longer relevant.

4.2 The 2022/24 Monitoring Report includes a 2.59 year housing supply but that is also based on the old standard methodology.

Table 10 Five Year Housing Land Supply at 31 March 2024

Component	Quantity
Total housing supply over next 5 years	7,990
Annual minimum housing requirement with 5% buffer	3,089
Housing Land Supply (7,990 / 3,089) (in years)	2.59

Five Year Housing Land Supply at 31 March 2024 supply figure taken from housing trajectory in Table 9.

4.3 Appendix 3 to the Plan sets out the five year housing land (2024/25-2028/29) supply based on the calculations in the Plan and it amounts to 6.43 years supply.

5YHLS 2024/5 to 28/29	Net additional Homes	+5% buffer
Local housing need 2021-2041*	29,100	
Net completions Apr 2021 to Sep 2024	7,666	
Remaining need 2024-41	21,434	
Remaining annualised need 2024-41	1,261	1,324
5-year need 2024-2029	6,305	6,620
Deliverable supply 2024-2029	8,514	
5YHLS 2024-2029 (in years)	6.75	6.43

*Local housing need established by the Coventry and Warwickshire HEDNA 2022

4.4 Most recently Table 6 of the HELAA includes a table of supply as of 30 Sept 2024. This shows a slightly lower 8199 supply in years 1-5, but that would only amount to 4.5 years, so is likely to result in a similar result.

Table 6 Total identified housing supply as on 30th September 2024

Supply type	Delivery forecast per 5-year period (2024/25 onwards)			Total
	1-5	6-10	11-17	
Identified Supply	7,799	6,409	6,819	21,027
Allocated sites in adopted Local Plan (not consented)	0	673	2,060	2,733
Allocated sites in Draft Local Plan Review (not commenced)	0	1,093	2,410	3,503
Under construction	3,485	60	0	3,545
Detailed permission (not commenced)	3,880	1,090	0	4,970
Outline permission	288	2,941	2,085	5,314
Permitted development	146	0	0	146
Other identified sites without permission and not allocated (HELAA Sites, call for sites)	0	552	264	816
Unidentified Supply				
Windfall	400	1,000	1,400	2,800
Grand Total	8,199	7,409	8,219	23,827

4.5 At present, because the current local plan is out of date, the correct measure of the 5-year land supply is the NSM figure of 1388 dpa, 6940 in total, plus 5%, or 7,287 dwellings. Based on the figures in the HELAA that would equate to 5.6 years of Supply.

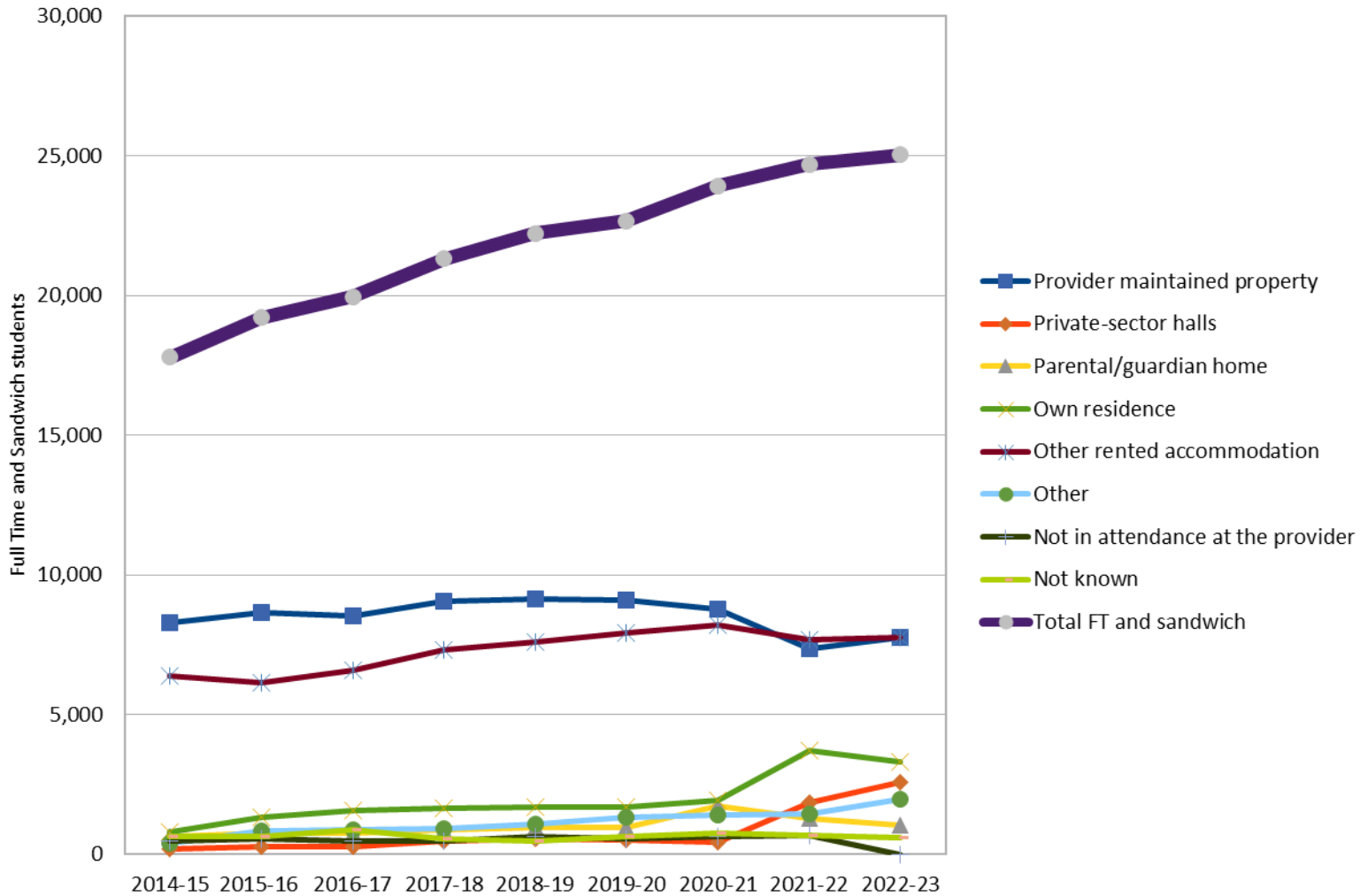
4.6 In fact, the five year supply is likely to be higher than the HELAA figure for the reasons given above so Coventry can safely claim a 5-year land supply.

4.7 If one adopted the figures I suggest (Section 2.3, Conclusions on Housing Need and Supply, above) the Windfall supply for years 1-5 would increase by 600 (400 residential/200 PBSA), giving a supply total of 8,799, or 6.0 year's supply with the 5% buffer.

4.8 This suggests Coventry has a 5-year land supply and is in a good position to maintain a 5-year supply in line with their aspiration in Policy H1 (3) of the Plan.

Appendix 1: Where Students Live: Data from HESA¹⁴

Univ of Warwick - Where full time & Sandwich students live



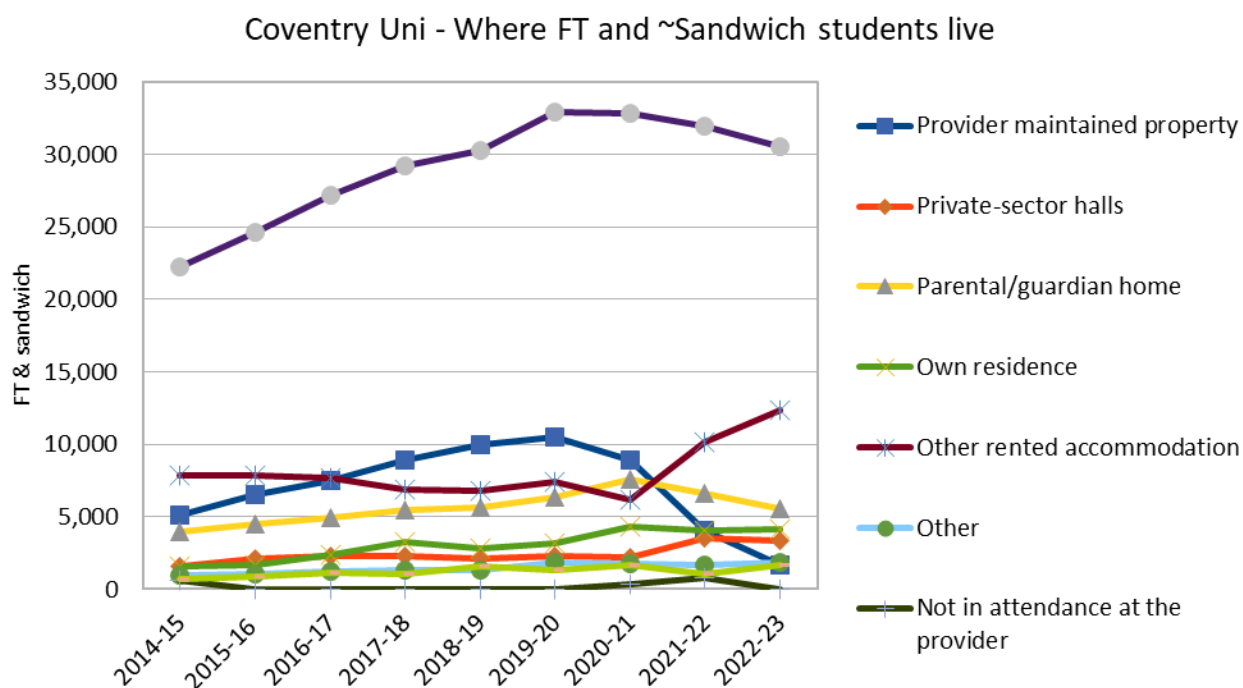
Some observations, at Warwick University

Over the 9 years of this data, total numbers of full time plus Sandwich students have increased by about 10,000

This breaks down into an increase as follows

¹⁴ From <https://www.hesa.ac.uk/support/definitions/students>

Location	Change, approx. over 9 years	
parental/guardian home		+395
Not known		-35
Not in attendance	[not available 190 over 8 yrs to 21/22]	
Other		+1600
Other rented		+1390
Own residence		+2510
Private sector halls		+2370
Provider maintained property		-520
	-555	



Location	Change over 9 years,	
parental/guardian home		+1585
Not known		+1005
Not in attendance	Unknown [160 over 8 years]	
Other		+855
Other rented		+4460
Own residence		+2600
Private sector halls		+1780
Provider maintained property		-3390