

IN10 Action points from week two hearing sessions

Response of Coventry City Council

Policy DS1 Overall development needs

AP13 Council to advise on relevant figures for potential inclusion in policy DS1 of the amount of additional retail floorspace needed from (a) 2021 and (b) 2024.

The NPPF 2023 para 90 (d) recommends that plans look ten years ahead in terms of retail.

The Retail and Centres Study 2024 [EB27] has a base date of 2023. This identifies a need for 5,876 sq.m (net sales area) additional convenience floorspace between 2023 and 2041 and 14,279 sq.m (net sales area) comparison floorspace over the same period. However, given the unreliability of long-term forecasts, the focus on meeting need should be over a ten-year period (to 2033 given the start date of 2023).

This identifies need for 3,733 sq.m (net sales area) for convenience floorspace and 8,412 sqm (net sales area) for comparison floorspace.

In meeting identified need for new comparison floorspace, no new allocations are required due to the significant amount of vacant floorspace in the City. For convenience floorspace, this identified need will be met primarily through the new Centres to serve the SUEs at Eastern Green and Keresley as set out in Policy R1, but also any potential to support new foodstore provision through the reuse of vacant floorspace in the City.

In terms of a 2021 start date, the Local Plan has been informed by the most up to date available evidence at the point of developing the Regulation 19 Plan. The evidence that underpins the retail market shares relates to 2023 has looked ahead by 10 years in line with the NPPF.

In terms of a 2024 start date our retail consultants (LSH) have advised that projections for the ten year period 2024-34 would be 4,302 sq.m (net sales area) for convenience floorspace and 8,155 sq.m (net sales area) for comparison retail floorspace.

The situation remains the same as set out earlier in the response to this question in terms of no new allocations being required for comparison goods and for convenience floorspace this will be met mainly through the new centres and reuse of vacant floorspace.

Policy H6 Affordable housing

AP14 Council to prepare a potential modification to policy H6 part 3 (to supersede that in PM3) and reasoned justification to clarify the affordable housing (C3 dwellings) in the area comprising the city centre and inner wards as defined on the policies map (and elsewhere in the city), having regard to the viability evidence and potential for public sector funding.

The Council proposes the following reasoned justification to be included in the plan as new para 6.31.

6.31. The policies map identifies the conclusions of viability evidence for plan making where central areas of the Authority Area were shown to be challenging to provide affordable housing provisions without the assistance of supportive grant funding. Development subject to affordable housing requirements in these areas should refer to policy H6 part 11.

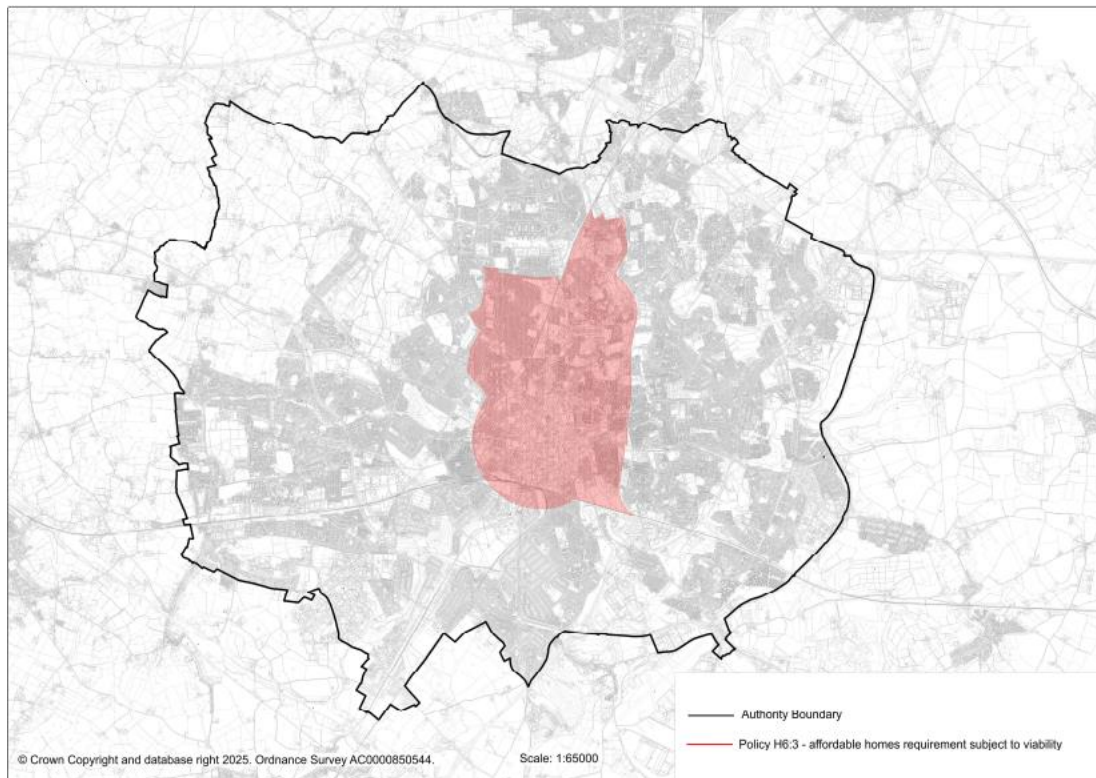
Superseding the previously suggested modification regarding Policy H6 Point 3 (page 46 of Examination Documents reference PM3) the Council proposes the following modification to the plan policy.

3. New residential developments of 10 or more dwellings ~~(gross)~~ or sites of 0.5 hectares (gross) ~~located within the area identified at Appendix 9(c) on individual sites, or on sites of more than 1ha~~ will be required to provide 25% of all dwellings as affordable homes. Sites located within the area identified on the policies map identified as 'affordable homes requirement subject to viability' must utilise point 11 of this policy.

This excludes Purpose Built Student Accommodation, co-living accommodation and Built to Rent accommodation, where the affordable housing provision is set out in points 5, 6 and 7 of this policy.

AP15 Council to amend the proposed change to the policies map [PMC2] so that the key reads “city centre and inner wards for the purposes of policy H6 part 3” (or similar).

The Council has amended the proposed change to the policies map [PMC2] as shown below. It has been simplified so that it directly reflects policy H6 part 3, and will be supported by the proposed additional text in the reasoned justification, potential new paragraph 6.31 (all subsequent paragraphs to be renumbered) as set out in our response to AP14 above.



AP16 Council to prepare a potential modification to policy H6 parts 8 and 9 to ensure that the proposed tenure mix reflects the Council's evidence of need and current national planning policy.

Policy H6 parts 8 and 9 are proposed to be modified as follows:

Tenure

8. The affordable housing tenure and mix will be determined in accordance with current national policy based on the local need highlighted in the latest HEDNA (or equivalent) supplemented with Homefinder (or equivalent) data. On this basis the Council will expect to seek:

- a. a tenure split of 60% social/affordable rent and 40% intermediate provision,
- b. of the social and affordable rent provision a minimum of half should be for social rent.; and
- c. ~~Accounting for any nationally set contribution for intermediate home ownership products, the remainder of the affordable home ownership is to be delivered as other intermediate home ownership products.~~

9. ~~Proposals must meet national policy requirements relating to affordable home ownership initiatives and local eligibility criteria, and where these are updated or altered, the latest requirements will be applicable.~~

Policy H7 Gypsy and Traveller accommodation

AP17 Council to prepare a potential modification to policy H7 and/or reasoned justification to include reference to:

- **The need identified in the GTAA (18 pitches between 2022 and 2041).**
- **12 pitches having been provided since 2022 at the Siskin Drive site identified on the policies map**
- **The Burbages Lane site identified on the policies map having capacity to accommodate 6 additional pitches.**

A modification is proposed to the reasoned justification para. 6.31 as follows:

6.31 A Gypsy and Traveller Accommodation Assessment (GTAA) was completed in February 2023. This concludes that there is a need for 18 pitches between 2022 and 2041. 12 pitches have been provided since 2022 at the Siskin Drive site and as shown in the GTAA there is capacity to accommodate up to 6 additional pitches at the Burbages Lane site. Both sites are identified on the Policies Map. ~~are currently 5 authorised pitches on Burbages Lane and an expected supply of 12 pitches following the redevelopment of the Siskin Drive site. This is able to cater for the assessed need (15 pitches) over the short term 2022/23 to 2026/27. Over the longer plan period to 2041 the GTAA concludes there will be a shortfall of 6 pitches but that these could potentially be accommodated at Burbages Lane.~~

A modification is proposed to Policy H7 Part 1 as follows:

Policy H7: Gypsy and Traveller Accommodation

1. Provision will be made for ~~at least 6~~ 18 permanent pitches for Gypsies and Travellers. These will be met through:

- a) 12 pitches at the Siskin Drive site as identified on the Policies Map
- b) An additional 6 pitches at the Burbages Lane site as identified on the Policies Map

Policy H9 Residential density

AP18 Council to prepare a potential modification:

- a) **To amend policy H9 part 2 to read “The density of residential development should be informed by a design-led approach that makes efficient use of land and achieves high quality development that reflects the site’s character and context having regard to relevant SPD” (or similar).**

The Council have proposed a modification to H9 accordingly as shown following. In addition the Council propose to add to the reasoned justification the following in order that the range of available and forthcoming guidance on local character may be referenced alongside the modified policy.

New para 6.41 - In applying the residential density policy, applicants should carefully consider local character by undertaking a contextual analysis which should be submitted within application Design and Access Statements. Regard should be given to Local Authority guidance including the New Residential Development Design Guide SPD, Design Codes and where relevant Conservation Area Appraisals.

(All other subsequent paras to be renumbered)

~~2. Proposed development density should be informed by a~~ The density of residential development should be informed by a design-led approach that makes efficient use of land and achieves high quality development that reflects the site's local character and context. in alignment with other plan policies

b) Delete paragraph 6.41.

~~6.41 It is important that density policies are applied in tandem with other policies of the plan and related SPDs to ensure appropriate levels of amenity space, landscaping and other onsite infrastructure. As such the Council's policy is set in the context of net densities that seek to maintain:~~

- ~~• At least 20% of gross site area to remain undeveloped on sites in excess of 2ha~~
- ~~• At least 15% of gross site area to remain undeveloped on sites below 2ha;~~
- ~~• At least 10% of gross site area to remain undeveloped on sites within the transition zone~~
- ~~• At least 5% of gross site area to remain undeveloped on sites within the city centre~~

Policy H10 Purpose built student accommodation

AP19 Council to prepare a potential modification to policy H10 to:

(a) Amend part 3 to read “Proposals outside the University of Warwick campus as defined on the policies map must ...”

3. Proposals outside the University of Warwick campus as defined on the policies map must provide evidence to show adaptability to other uses by being designed in such a way that it can be capable of being re-configured through internal alterations to meet NDSS standards to meet general housing needs in the future.

(b) Delete parts 4 and 5 and replace with the following (or similar):
“Development must comprise predominantly cluster units providing high quality

accommodation with communal areas for cooking, eating and socialising suitable for the number of units. Proposals for studio flats will be considered having regard to the latest evidence of need.”

~~4. Developments that comprise a predominant studio ratio will be considered in line with the most up to date available evidence.~~

~~5. Proposals should comprise predominantly cluster units of no more than 8 units per cluster.~~

Development must comprise predominantly cluster units providing high quality accommodation with communal areas for cooking, eating and socialising suitable for the number of units. Proposals for studio flats will be considered having regard to the latest evidence of need.

Policy JE1 Overall economy and employment strategy

AP20 Council to amend the proposed modification to policy JE1 part 1(i) to read:

“... associated with them having regard to the University of Warwick SPD”.

Policy JE1: Overall Economy and Employment Strategy

i. Support the continued growth of the city’s two universities and in doing so maximise the economic development and other community benefits associated with them having regard to the University of Warwick SPD.

Policy JE3 Non-employment uses on employment land

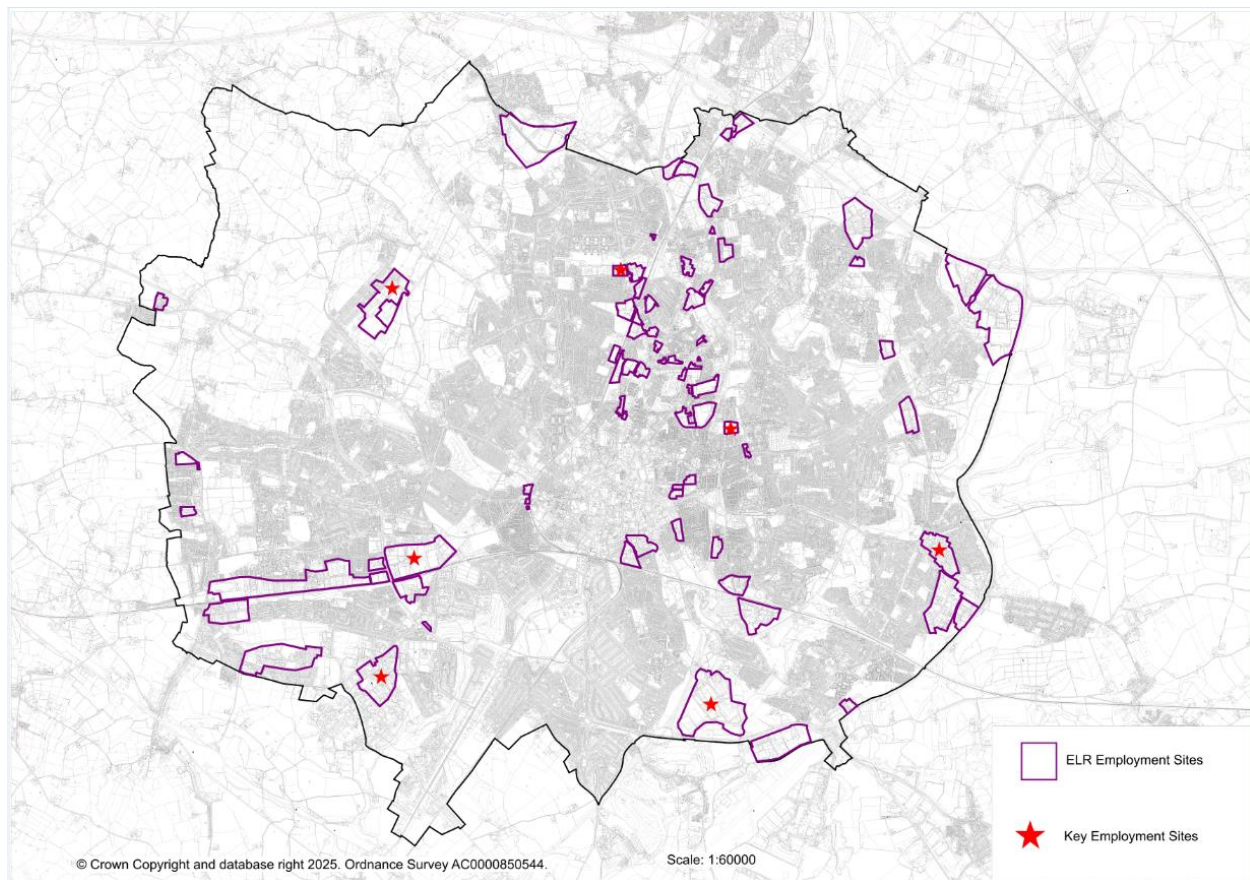
AP21 Council to prepare a potential modification to policy JE3 part 2 to read “Proposals for the redevelopment in whole or part of the existing employment sites designated on the policies map, and other land and buildings in employment use, for non-employment purposes will not be permitted unless ...”

Policy JE3: Non-Employment Uses on Employment Land

2. Proposals for the redevelopment in whole or in part of the existing employment sites designated on the policies map, and other land and buildings in employment use, ~~employment land for non-employment purposes~~ will not be permitted unless it can be demonstrated that the part(s) of the site where non employment development is proposed are:

AP22 Council to prepare changes to the policies map to designate all of the existing employment sites identified in the Employment Land Review.

This has been done and the proposed changes are set out in the map below.



Policy JE5 Industrial and storage / distribution development

AP23 Council to prepare a potential modification to policy JE5 parts 1 and 2 to read as follows (or similar):

“1. Proposals for industrial or storage / distribution development on the allocations and Key Employment Sites listed in policy JE2 and existing employment sites designated on the policies map will be supported.

2. Proposals for industrial or storage / distribution uses (including changes of use and expansion of existing uses) elsewhere will be supported if they meet all of the following criteria ...”

Policy JE5: Industrial and Storage / Distribution Development

1. The Council's preferred location for new industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2. Proposals for industrial or storage / distribution development on the allocations and Key Employment Sites listed in policy JE2 and existing employment sites designated on the policies map will be supported.

~~2. Proposals for new industrial and storage/distribution development (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are~~ Proposals for industrial or storage / distribution uses (including changes of use and expansion of existing uses) elsewhere will be supported if they meet all of the following criteria:

- a. Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;
- b. Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;
- c. Would not significantly compromise the viability or deliverability of ~~Land~~ land allocated in this Plan for employment development;
- d. Would be compatible with other Plan Policies.

Policy JE8 Research and Development uses

AP24 Council to prepare a potential modification to policy JE8 to clarify the locational requirements for R&D uses, having regard to the approach set out in AP23 above.

Policy JE8: Research and Development Uses

~~1. The Council's preferred location for new Research and Development (R&D) are the sites allocated for such purposes under Policy JE2.~~ Proposals for new Research and Development uses on the allocations and Key Employment Sites listed in policy JE2 and existing employment sites designated on the policies map will be supported.

~~2. However, proposals for new R&D, (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:~~ Proposals for new Research and Development uses (including changes of use and expansion of existing uses) elsewhere will be supported if they meet all of the following criteria:

- a. Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;
- b. Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;
- c. Would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development;
- d. Would be compatible with other Plan Policies.

Policy R1 Delivering retail growth

AP25 Council to prepare a potential modification to policy R1 to delete parts 2 and 3 in the column headed “Details”.

The Council proposes a modification to the second row of the table in Policy R1 to delete parts 2 and 3 such that Policy R1 reads as follows:

Site	Proposed floor space (sq.m gross)	Details
New Eastern Green Local Centre	Up to 1000sqm	1. To include a range of small scale units providing a range of local community uses and top up provisions. 2. The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area. 3. Further retail, leisure and other town centre uses at Arena Park and Brandon Road Major District Centres will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider tourism functions.

Eastern Green district centre

AP26 Council to consider whether the “Details” included in policy R1 relating to the proposed Eastern Green district centre (and/or policy DS4 part D) need to be modified to ensure the creation of a high quality town centre comprising a variety of main town uses in units of different size with attractive public realm, good access by walking, cycling and public transport and limited car parking provision (rather than an out of centre retail park).

The Council proposes the following modification to the first row of the table in Policy R1

Site	Proposed floor space (sq.m gross)	Details
New Eastern Green District Centre	Up to 10,000	To include a range of retail and leisure uses <u>A sustainable high quality town centre will be provided. This will comprise a variety of main town centre uses in units of different size with attractive public realm, good access by walking, cycling and public transport and limited car parking provision</u>

Accordingly, a modification is also proposed to Policy DS4 part D, adding a new point xi to read:

Xi: Creation of a new high quality town centre in accordance with Policy R1

Policy R3 Town centre network

AP27 Council to prepare a potential modification to policy R3 part 2 so that the sentence under the list of three major district centres reads as follows (or similar):

“Proposals for further retail, leisure and other main town centre uses or additional floorspace at these three centres will not be permitted unless it can be demonstrated that they will not have a significant adverse impact on the city centre or other town centres in the network”.

2 Centre boundaries and Primary Shopping Areas (PSA) for the following Major District Centres are shown on the Policies Map at:

- a. Arena Park;
- b. Cannon Park;
- c. Brandon Road.

~~They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city.~~

Proposals for further retail, leisure and other main town centre uses or additional floorspace at the above centres will not be permitted unless it can be demonstrated that they will not have a significant adverse impact on the city centre or other town centres in the hierarchy.

AP28 Council to prepare a potential modification to policy R3 part 3 to refer as relevant to the redevelopment of Riley Square in the Bell Green district centre.

3. Centre boundaries and Primary Shopping Areas for the following District Centres are shown on the Policies Map at:

- a. Ball Hill;
- b. Bell Green;
- c. Brade Drive
- d. Daventry Road;
- e. Earlsdon;
- f. Eastern Green*
- g. Foleshill;
- h. Jardine Crescent;
- i. Jubilee Crescent

They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small-scale office uses will also be acceptable.

The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area.

Policy CC1 part E City Centre Character Areas

AP29 Council to prepare a potential modification to the section of policy CC1 part E headed “Northern Regeneration Area” having regard to the West Midlands Growth Plan 2025. This could include reference to the following (along with amendments to parts (a) to (f) in the policy as relevant and necessary:

- a) **The opportunity for transformational placemaking through comprehensive masterplanning and a design-led approach.**
- b) **The provision of a significant number of new homes from the mid 2030s onwards (in addition to the three allocations in the Plan).**

Modifications are proposed as follows:

Policy CC1 (Part E) – City Centre Character Areas

Northern Regeneration Area

a. ~~Proposals supporting the aims of mixed-use redevelopment of the Area~~ opportunity for transformational placemaking through comprehensive masterplanning and a design-led approach will be encouraged, having regard to the West Midlands Growth Plan 2025 and in accordance with other parts of this Plan.

b. In addition to the housing allocations in Policy H2 which fall within this area, the area will be primarily promoted for new residential development in a range of types and tenures a significant number of new homes will be provided from the mid 2030s onwards as part of mixed use regeneration proposals. ~~although a range of other uses will be acceptable subject to conformity with other parts of this AAP.~~ These include:

- ~~Office;~~
- ~~Retail and commercial;~~
- ~~Social, community and leisure uses;~~
- ~~Education uses (including those linked to the university);~~

~~Such uses should contribute towards active frontages at ground floor level.~~

c. ~~Green and blue infrastructure should form an integral part of all development proposals within the area. This should include the consideration of deculverting where possible and viable.~~ The Northern Regeneration Area will seek to enhance the quality of publicly accessible spaces, introduce urban wildlife habitats, take opportunities for opportunities for de-culverting of the River Sherbourne and seek to enhance the setting of heritage assets

d. ~~New development opportunities should not conflict with any other policies within this Local Plan.~~

e. ~~Swanswell Pool is of historic importance to the local area and the city centre as a whole. Opportunities to expand the park and enhance its quality will be supported. This should include opportunities to improve its linkages to the wider city centre.~~

f. ~~Proposals for the redevelopment of White Street Coach Park will be encouraged, where they are linked to appropriate amendments to Ring Road junction 2~~

