

**Coventry  
Local Plan  
Examination**

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**Inspector: Rebecca Phillips** BA(Hons) MSc DipM MCIM MRTPI

**Programme Officer: Lisa Albrighton**

**T:** 024 7683 2634

**E:** [programmeofficer@coventry.gov.uk](mailto:programmeofficer@coventry.gov.uk)

Examination Room, Civic Centre 4, Much Park St, Coventry, CV1 2PY

**Coventry City Council**  
**Local Plan 2016 – Examination Statement**  
**Hearing Session 4: Site Allocations for**  
**Housing (1)**



Coventry City Council

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## **1. Masterplans and Key Development Principles**

### **a) Will the development of the Urban Extension Design Guidance SPD adequately guide the development of comprehensive Master Plans for the strategic sites?**

The Council is aiming to develop a document which will provide detailed guidance around the type of built environment it would like to see created within the SUE's. This will be based around the Ancient Arden Design principles and will include:

- house design;
- street typology;
- parking solutions;
- sustainability measures;
- landscaping;
- key site features and opportunities;
- drainage examples; and
- a material pallet

The Council have been clear with site promoters that it recognises the amount of work that has already been undertaken in preparing masterplan documents for significant parts of the 2 SUE's and although further work is required and remains on-going, the Council does not want to undermine or devalue that work. As such, the design guidance is very much about helping lift development out of the Masterplans and into the development stages by promoting materials, street scenes and landscaping etc. It is for this reason that the Council are accelerating their work on the Design Guidance so as not to delay development being brought forward and to ensure it is able to influence proposals as they materialise.

### **b) Will it identify key development principles for each of the strategic sites?**

Yes. The Design Guidance is intended to offer a range of principles to support and encourage development that is not only sustainable, but which is appropriate in the context of the 2 SUE areas and their historic context and character.

In both cases the sites sit within the Ancient Arden landscape, which is recognised as having a strong degree of importance to this part of the country. Through the consultation exercises on this Local Plan the Council were clear that the principles of this historic characterisation would provide a solid foundation for design principles and guidance as developments were taken forward.

Having regard to the existing Ancient Arden Design Guidance (LP80) it is clear that traditional development within this area is often focused on small buildings brought forward in isolation or as part of small clusters with clear design features associated with roof lines and materials. As such, this guidance will not, in terms of scale at least, directly transcend into the SUE areas as they offer significantly larger development opportunities, however there is scope to focus on materials and appearance. We expect the Guidance therefore to offer a range of options and approaches to allow a differentiation in development styles and materials to help

generate an interesting and dynamic community which retains its historic associations and character whilst also appealing to modern development processes.

To support our understanding of Design guidance we have reviewed a range of examples across the Country and explored best practice examples. The on-going urban extension at Upton in Northamptonshire for example offers a valuable insight into how local materials and building designs can be interpreted into a modern context, maximising vistas and connectivity. We intend to continue reviewing best practice examples in advance of hosting a range of workshops with developers and local communities in advance of formal consultation on a Design guidance SPD later this summer.

**c) If so, should these principles be included in the Local Plan?**

In developing the Local Plan we gave consideration to including more detailed design principles for the SUE's within the Local Plan itself. After developing the Plan policies around the housing allocations, historic environment, green environment and design however we felt that the Plan itself provided a solid foundation for producing more detailed guidance as a Supplementary Planning Document. By utilising an SPD for the detailed design principles and guidance it allows the Council to focus on a broader array of aspects, set out an appropriate range of materials and engage on a wider scale with local communities to help greater local buy-in to the proposals.

To have tried to include such detail within the Plan itself would have made for a far longer Plan and diverted the Strategic Plan into a level of Policy that was not necessarily appropriate or necessary.

**d) Should the strategic sites each have their own policy in the Plan to aid clarity and the coherent development of these sites?**

The inclusion of site specific policies was considered through the Plan development process. On balance however we felt that with the sites allocated in Policy H2, which also offered an opportunity to highlight and directly link in a range of appropriate essential requirements (to support sustainable development principles) that to add additional site specific policies would again increase the length of the Plan and duplicate policy designations.

We also felt that by applying an isolated policy to a site allocation that it removes a degree of flexibility from the site proposal and increases the rigidity with which a proposal should come forward.

Lastly, we felt that to provide a single policy for 1 site would mean needing to provide individual policies for each allocated site regardless of land use. This would suggest a need for 25 housing policies and a further 4 employment and 2 retail policies (as mixed use sites would be picked up in single site policies). We felt such policy provision to be excessive and unnecessary.

In this context we fully believe that the Plan as presented is suitable and appropriate to support the sustainable delivery of all strategic sites.

**e) Does the Plan make adequate provision for monitoring, review and response to changing market conditions? Does it contain clear identifiable targets and milestones as well as triggers for action if the sites and supporting infrastructure do not come forward as anticipated?**

Yes, the Plan has been specifically designed to provide a flexible policy framework. It is considered sufficiently flexible to deal with and respond to unexpected changes quickly and appropriately. It also offers a varied and diverse choice of site allocations to respond to market demand and development needs with a supporting framework of policies prepared in a robust, justified and flexible way.

With regards monitoring, the Annual Monitoring Report provides a key mechanism to assess the performance and delivery of the Plan, with a view to reflecting the indicators identified in Appendix 8 of the Plan as a minimum. The Monitoring Framework has been appended to the Local Plan to reflect the fact that it is a 'living document'. Many of the Local Plan policies will require assessment over time to understand appropriate trends and impacts on development. This reflects the changing face of planning policy in recent years and the increasing need to consider the impacts of climate change and sustainable development. Where trends become apparent through monitoring, this Framework will be updated through the Annual Monitoring Report process. Notwithstanding our view that the Plan is sound and robust and capable of delivering over the Plan period, this will also provide a solid basis for assessing whether a review of the Plan (in part or as a whole) is necessary in case of a significant change in circumstances or a drastic under performance or failure of a policy.

In addition we would also highlight the possibility of bringing forward a Supporting Housing Delivery DPD, which is highlighted in the Council's LDS and referenced in the Plan. We consider this document to offer a flexible and helpful option should a need to bring forward additional site allocations be required or site delivery not meet the rates expected. In deed the supporting text to Policy H1 is clear that 1 trigger for bringing forward this DPD would be the failure of the Council to identify a robust 5 year land supply for 2 successive years. As the Plan is intended to support other aspects of housing a secondary trigger is identified in the supporting text to policy H7 and relates to a continuation of recent short term trends in transit pitches for Gypsies and Travellers or a failure to meet wider needs.

## **2. Allocated Site H2:1 – Keresley SUE**

### **a) How would the development of the site contribute to the aims and strategic objectives of the Local Plan?**

Site H2:1 has been identified with a view to contributing positively to the aims and objectives of the Plan as a whole and supporting the delivery of sustainable development. Indeed, as the largest allocation within the Plan it is expected to make a significant contribution to the city's housing delivery and the diversification of its housing offer. It is also one of the first planned urban extensions to Coventry in 50 years.

In housing terms, the site first and foremost is considered to respond positively to objective 7 as it is considered suitable and appropriate for providing new homes to meet the needs of local people. It has the capability of providing a range of property types and tenures to support housing pathways and housing options for all aspects of the population. Indeed, the Council have ensured that through the site assessment and identification process that all sites proposed for allocation do offer opportunities for varied types and tenures of homes, offering a flexible supply of land to support the market in responding to changes in demand in a quick and appropriate way.

In relation to Objectives 2, 3, 5 and 6 in particular the Local Plan (and the sites allocated within it) is clear that development must be supported by appropriate infrastructure. This is especially true for the larger SUE proposals, where onsite delivery of infrastructure becomes of greater relevance. The Council has sought through its evidence base, its engagement processes and its policies (including the IDP) to understand and identify the infrastructure needs of the proposed SUE and what is required to support the proposed level of growth. We have clearly considered:

- Highway impacts and mitigation requirements;
- Public transport and active travel needs, aims and connections;
- Education needs at all levels;
- Health care requirements and expansion opportunities;
- Green and blue infrastructure;
- Public realm programmes;
- Sustainability principles including environmental measures to mitigate issues such as flood risk;
- Utility requirements to support growth; and
- Social and emergency services

Although we have placed all aspects of infrastructure on an even footing, the issues relating to transportation, green infrastructure and the public realm are central to these objectives. Through the allocation of this site therefore we see:

- key opportunities to enhance access to public transport (with notable examples of rail connectivity);
- Key opportunities to link new homes at Keresley with new job opportunities at Pro-Logis Park and around other employment hubs in the neighbouring areas.

- Opportunities to connect into existing highway networks, footpaths and cycle ways;
- create high quality, useable and publicly accessible green and blue infrastructure with focal points within the Keresley SUE around the ancient woodlands and the Hall Brook corridor

Through the delivery of new homes and supporting infrastructure the Plan also promotes economic growth and the creation of new jobs throughout the city. This responds especially to Objective 1-4. In recent years the city has experienced increases in in-commuting for work with the city's housing offer being skewed towards smaller, lower value properties. This is highlighted clearly in the SHMA and the Local Plan has been developed with a view to combating this issue. The Plan is clear that in order to continue attracting business and creating more jobs for local people that the city's housing offer needs to be diversified with greater emphasis on bringing forward larger family homes whilst also offering higher value alternatives to support the upper levels of the housing pathway. The Plan is under no illusion that this will be a long term process and cannot happen overnight, however it seeks to provide a solid foundation to help kick-start the diversification in the city's housing offer and provide genuine housing alternatives to surrounding towns and cities. The Keresley SUE is a key component of supporting this approach.

One overarching aspect that supports all Plan objectives is design. Throughout the development of the Local Plan and through consultation events, the Council were clear that high quality and appropriate design would be one of the primary focal points of new developments. From considering the benefits appropriate design can have to ensuring safer communities (by designing out crime) (objective 9) to looking at how it can support an enhanced built environment to raise the profile of the city (Objective 4), design has been integral in the Plans development. In terms of the Keresley SUE, the Plan and the Design Guidance which will support it provide appropriate design approaches that reflect the historic environment, using new development to reflect historic character through materials, setting, connectivity and infrastructure. Site H2:1 also provides opportunities to integrate listed and locally listed buildings and features into the new development. Although this introduces challenges around ensuring appropriate setting, the Council are committed to working jointly with Historic England and utilising the policies proposed within the Plan to continue the work we have already undertaken through our site assessments and evidence gathering to ensure that development not only respects heritage assets but enhances them and utilises them as part of excellent design, layout and onsite infrastructure.

Focusing again on overarching objectives, the Local Plan has been developed in the context of Coventry being a Marmot City. Amongst other things, this has placed important emphasis on the city's need to tackle health inequalities by focusing on active travel, improved build quality, a cleaner, greener and safer built environment (including targeted reductions in air quality) and more accessible and useable green and blue infrastructure. Objective 8 of the Local Plan is included to emphasise the importance of improving the health and wellbeing of local people and the identification of the sites in policy H2, as well as some of the less strategic opportunities in the SHLAA, are aimed towards revitalising the built environment. This can help bring people closer to jobs, services and local facilities, promoting

more active methods of travel and reducing the reliance on the car. The city also has a track record of supporting urban regeneration and delivering new areas of green infrastructure in the process. Through high quality design, we can help generate benefits for mental health. The Local Plan has also been developed around a commitment to protecting the most sensitive and highest quality green spaces from development, a commitment we feel we have maintained and one that will be essential to the retention and creation of high quality green spaces that people can utilise for leisure. The Keresley SUE provides a prime example of this approach with planned enhancement of the Hall Brook corridor to provide a high quality green and blue corridor that run through much of the site. The protection of the ancient woodland and enhanced connectivity between them will support improvements in biodiversity and ecology value as will the retention of ancient hedgerows and high quality trees.

**b) Are the proposed land uses appropriate? What are the components of the proposed mixed-use elements of the scheme?**

The proposed uses are wholly consistent and appropriate to the creation of a sustainable urban extension. To help inform our view we have considered other examples across the country. We have also had regard to the impact the provision of 3,100 homes would have within the local area and this has been considered in partnership with the Education Authority, the NHS and other key stakeholders. This has been with a view to ensuring appropriate infrastructure can be provided and positively planned for during the Plan period. The following components are proposed:

Land Use Type:

- 3,100 dwellings – mixed type and tenure including 25% affordable
- A new local health facility
- 2 new primary schools alongside offsite contributions to expand existing local schools. Both primary school would be 2 form entry
- 1 new secondary school to support the North West corner of the city. This would be 8 form entry
- Retention or replacement of existing sports pitches with opportunities to link these in with the school sites to be explored and prioritised where practicable.
- 2 new Local Centres in accordance with policy R2 to provide a focal point for local retail and community facilities
- Significant green and blue infrastructure to protect the ancient woodlands and create a high quality brook corridor along the Hall Brook

It is important to note that 1 of the Local Centres, 1 of the primary schools, 800 homes and significant contributions to green and blue infrastructure are already planned as part of the Lioncourt Homes proposal for Phase 1 of the SUE. This application would also secure financial contributions towards secondary education and support highway infrastructure also.

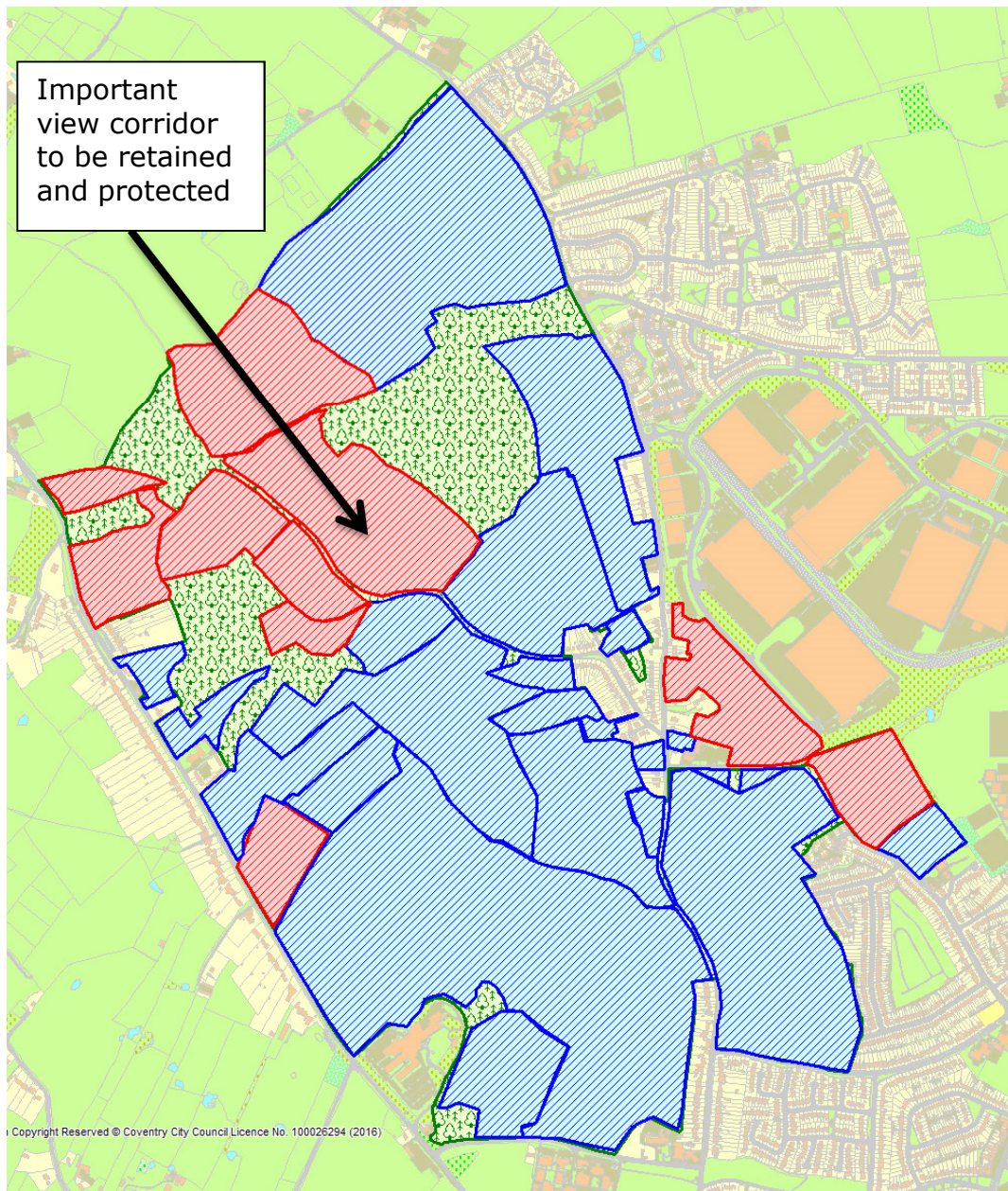
**c) Is the proposed level of housing appropriate? What is the proposed density of the residential development and would it be appropriate?**

In providing our response to this question we draw specific focus to the Council's SHLAA (LP53) and the Assessment of Development Density in Coventry (LP50).

In relation to site H2:1, the site has been considered as a number of parcels through the SHLAA process, which reflects different site promotions and ownerships. The full area of land identified within the red line of the allocation was considered through this process, although a number of parcels were not shortlisted as being suitable for development and as such did not contribute towards the capacity assumptions for the SUE. For example, the areas of ancient woodland to the north of the SUE as well as the ridge line which runs north to south between them are not expected to be developed due to concerns over visual impact on the wider Green Belt and the significant effect on historic landscape and character. Instead we expect these areas to provide the focal point for green infrastructure, which would be supported through the Design Guidance and Masterplan approach.

The plan below is a reflection of our evidence base and emphasises this approach





In terms of the shortlisted parcels, in the vast majority of cases we have assessed the capacity of these sites in the context of our evidence base proposing a 30dph density across 80% of the gross site area. Across the parcels there have been 4 notable exceptions to this approach:

- Bab16 – the Lioncourt proposal. As the detailed assumptions about this site were known, we have applied the relevant density and capacity. This totalled 800 homes at approximately 19dph across the full site area (or 24dph if we applied an 80% gross to net). This parcel of land has been granted planning permission by the Council subject to a completed Section 106 Agreement and approval by the Secretary of State (if required).
- Bab 19 – the site proposed by AMEC Foster Wheeler on behalf of Barratt Homes. As part of the engagement process AMEC FW have provided detailed site proposals for this portion of the SUE. In principle we felt this proposal was appropriate and sought to manage the key site issues in an

appropriate and justified way. This totalled 430 homes at approximately 22dph across the full site area (or 28dph if we applied an 80% gross to net).

- Bab 51a – the site totals some 10.3ha in size, however we have reduced the developable area to 4.3ha to reflect the existing sports pitches. The 4.3ha provides the basis for the density calculation at 30dph.
- Bab 55 and Bab 64 have utilised reduced density assumptions due to their presence on the Tamworth Road and the opportunity they offer to provide more infill related plots. As such, density would need to be more in keeping with the street scene to reflect an appropriate design approach. As such, these 2 sites would deliver 5 and 8 homes in total at a density of 9dph and 13dph respectively.

If we take account of the total site area of the developable parcels we see a density assumption of approximately 21dph. This reflects the presence of woodlands, isolated areas of flood risk and drainage concern, historic landscape features and the provision of supporting sports facilities and community services. As such, we consider this density and the approach that informs it wholly justified and appropriate.

#### **d) How would sustainable travel choices be optimised?**

The Accessibility Chapter sets out a modal hierarchy which actively promotes and encourages the utilisation of sustainable travel choices for shorter local trips. For local trips to amenities such as to schools and local shops, walking, cycling and public transport should be developed to the point of being the most attractive modes of travel.

Policy AC1: Accessible Transport Network, requires that development proposals which are expected to generate additional trips on the transport network should integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes. This policy will apply to site H2:1, and therefore it will be expected that the site will be served by a range of sustainable travel modes. The development of a masterplan (or selection of Masterplans) for the Keresley SUE will also create opportunities to amplify the detail of those routes and linkages.

Policy AC1 seeks to ensure that new developments support the provision and integration of emerging and future intelligent mobility infrastructure, including electric vehicle charging points, car club schemes and bicycle hire. These types of technologies will primarily benefit the promotion, viability and integration of sustainable travel modes and will be promoted as part of the development of site H2:1.

Policy AC3 requires new development proposals to have a Travel Plan in place. This is considered as the primary method for promoting the adoption of sustainable travel modes. This policy will apply to site H2:1.

Policy AC4 Walking and Cycling, requires that new development proposals incorporate appropriate safe and convenient access to walking and cycling routes.

For larger developments such as site H2:1, financial contributions may be also be required to support improved pedestrian and /or cycling routes on the wider network. This policy also outlines plans for the delivery of a city wide strategic cycle network developed as part of the Cycle Coventry Initiative. Opportunities will be sought to deliver and integrate this network into the site H2:1 including improved linkages to, for example, the City Centre along routes 17, 1, 15 and the orbital route.

Policy AC4 sets out proposals for a complementary network of connected Quiet Streets with the aim of creating an environment where walking and cycling are the preferred modes of transport. This concept will be prioritised through the development of SUE sites including site H2:1.

High quality cycle parking and associated facilities, such as changing, shower and storage are an important part of encouraging sustainable travel and these measures will be required as part of all new development proposals in accordance with the cycle parking standards in Appendix 5 of the Local Plan.

Policy AC5 seeks to ensure that major new development proposals have safe and convenient access to the local bus network. This would apply to site H2:1 which is likely to require the inclusion of new bus infrastructure to enable existing/new services to be fully integrated into the development site.

Policy AC5 also sets out proposals to develop a mass rapid transit network which seeks to improve sustainable access to major trip attractors such as site H2:1. All major development proposals, such as site H2:1, which is expected to create significant numbers of additional trips on the network, will be required to make appropriate provision for those routes to facilitate the integration of the rapid transit network into the development site where appropriate and feasible.

Policy AC6 supports improved access to rail stations, including HS2, by all modes of travel. There are opportunities being developed through the West Midlands Combined Authority for improved sustainable transport links between Coventry and the HS2 interchange which would support enhanced access by sustainable modes to/from site H2:1. The proposed link road at Keresley will also support increased connectivity to the new railway station at Arena Park.

#### **e) How would the sustainable transport corridors link to the wider transport network?**

Policy AC1 Accessible Transport Network, requires that development proposals which are expected to generate additional trips on the transport network should integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes. This policy would therefore ensure that sustainable transport links are provided to integrate site H2:1 into wider transport network.

Policy AC4 requires that development proposals should incorporate appropriate safe and convenient access to walking and cycling routes and if these links do not exist, new and upgraded routes will be required which must appropriately link into

established networks to ensure that routes are continuous. The location of site H2:1 will mean that new links, such as cycle routes, will be required to link the site into an established and safe part of the existing cycle network.

Policy AC5 seeks to ensure that new major development proposals have safe and convenient access to the existing bus network. In areas where this is not achieved, new developments may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site and the wider transport network. The successful application of this policy is likely to require the extension of existing bus routes into site H2:1.

The proposal to develop a mass rapid transit network (AC5) will improve sustainable access to major trip attractors. This network will, where appropriate and feasible, be integrated into major housing sites, such as H2:1 and as well as major transport interchanges including Coventry railway station.

Policy AC6 encourages improved interchange facilities between rail and other modes of travel. It also supports the delivery of objectives in the Coventry Rail Investment Strategy for improved rail connectivity, for example, on the Coventry north-south corridor. The policy also seeks to support proposals for additional local railway stations on the east-west and north/south rail corridor within Coventry. In the case of the Keresley SUE the highway infrastructure will support improved connectivity to the new railway station at Arena Park.

**f) What proportion, if any, of the residential scheme would contribute to the 5 year housing land supply?**

In responding to this question we draw specific focus to the Councils SHLAA (LP53) with particular focus on Appendix 4.

In General terms it is also important to note that we have taken a consistent approach to all sites currently situated within the Green Belt as we deem this policy designation to be a notable constraint on site availability and deliverability until such time as the Local Plan is adopted and facilitates the removal of this constraint. Although we recognise that once the Plan is adopted and land is removed from the Green Belt that such sites may be developed sooner than currently projected at this point in time we do not feel justified in highlighting such sites as deliverable (i.e. identifiable within the first 5 years of the Plan period in accordance with national guidance). In principle however, we hold no objection to sites being delivered sooner than currently projected so long as they are supported by appropriate infrastructure and are brought forward in accordance with the objectives and policies of the Plan.

We would also clarify that the Council is committed to reviewing its 5 year housing land supply on at least an annual basis and is also committed to undertaking this work in partnership with our Warwickshire neighbours. This will ensure we are able to respond to changes in market circumstance and demand and factor in the most appropriate delivery projections for sites on a rolling basis.

With specific focus on the Keresley SUE we would draw attention to our earlier letter to the Inspector (LP131), which explains our approach to how this site could contribute to the 5 year land supply.

**g) How would the Master planning approach secure high quality sustainable design which incorporates resource efficiency and responds to the local context (including the protection and enhancement of the historic and natural environment? How would it integrate with neighbouring areas?**

The masterplan would work in tandem with the Design Guidance and wider Local Plan policies to ensure the proposed Keresley SUE was designed and delivered in a positive, effective and sustainable way.

It would help to ensure all heritage and natural environment features were identified from the outset and incorporated and considered positively through development. This could include the protected setting of listed buildings and other heritage assets as well as providing for appropriate buffers to ancient woodlands and the integration of historic hedgerows and important trees etc. We have also considered the relationship of the site to the Burrow Hill Fort Scheduled Ancient Monument near Corley, which has helped influence the developable aspects of the SUE in relation to its impact on relevant view corridors and the setting of the SAM.

The development of supporting Masterplans and Design Guidance have been identified as being significantly important to a scheme of this size and within an area of the city that reflects an outward expansion of the urban area. The site already relates well to Coventry in that it predominantly sits within 2 arterial routes (Tamworth Road and Bennetts Road), however the challenge will be to ensure vehicle and pedestrian connections link into the existing urban area allowing existing local communities to benefit from the infrastructure that will be provided on site as well as new residents. We fully expect this to be supported by the existing ribbon developments along Thompsons Lane, Fivefield Road, Watery Lane, Bennetts Road (North and South) and Tamworth Road which already penetrate into the wider SUE area, whilst the suburban areas at Penny Park Lane, Brookford Avenue and Exhall Road will support a clear growth of the existing urban area in a natural and logical form. Although our Design Guidance will have regard to connectivity and key routes etc. this is likely to focus on the style of routes and their appearance as opposed to exact locations and pathways. This reflects the fine line that we are managing between the Design guidance and the Masterplans and reflects our engagement work with a number of site promoters.

**h) Is the location and scale of the allocation appropriate to the size, form, characteristics and function of the existing nearby settlement/s?**

The location and scale of the site allocation is entirely appropriate to the notion of a sustainable urban extension. It would be planned and developed adjacent to the existing built up area of North West Coventry creating strong links to the existing

urban areas around Pro-Logis Park and Keresley village, which are broadly connected already to the main urban area of Coventry by previous developments over time.

Through the assessment of sites through the SHLAA we have taken into consideration key areas for protection and the key views and features that effect the site. For example the ancient woodlands would continue to be protected and the ridge line running between them should also be protected. This would help provide a green infrastructure focus but also support the creation of improved links between the woodlands for ecology and biodiversity purposes.

In terms of the scale and form of the SUE, we would expect the area to be delivered outwards from the existing urban area. Both the Lioncourt and Barratt schemes have been prepared in greatest detail thus far and both sit adjacent to the existing urban area. The site at rookery Farm is also promoted as being readily available due to its proximity to the existing urban area. As these parcels are developed and the SUE grows this will provide a greater platform for the wider SUE to be developed and ensure a greater integration and relationship with the urban area as it grows and expands in a sustainable and logical way. Notwithstanding we would also expect earlier development opportunities to the frontage of both Tamworth Road and Bennetts Road, with opportunities to link in with existing ribbon developments in these locations (subject to appropriate infrastructure provision).

With regard to how development will respect the character of the area we have been proactive in understanding the listed buildings and historic character of the area. We have been quite clear within the Plan that the Ancient Arden Design Guidance will provide an important platform from which to secure high quality design which is reflective of the areas historic character and form. This work is already underway and progressing well.

**i) Has a viability assessment been carried out? If so, what are its conclusions?**

As part of the work we have undertaken on the Local Plan we have kept a close overview of development viability. This has included the development and subsequent monitoring of our AHEVA. It has also included numerous rounds of public consultation and engagement as well as standalone meetings with site promoters. Although we have not undertaken a detailed site viability analysis we have used the above information to help confirm that the proposals in the plan are viable and deliverable in principle. For example:

- The AHEVA makes allowance for infrastructure contributions as part of its viability test.
- The AHEVA considered prices and values at the start of the plan period. We know through monitoring that if anything the viability of new homes in Coventry is improving (LP131).
- Although we recognise that some site promoters have asked for additional clarification around specific aspects of infrastructure we note that none appear to directly challenge the viability of development, the deliverability of allocated

sites or the plan as a whole or challenge the identified infrastructure in principle.

- The additional requirements we have highlighted throughout the Plan (including those at site H2:1) such as additional build standards etc. are identified initially as aspirational, but also to reflect improving standards over the lifetime of the Plan. This will help to ensure the Plan remains relevant and appropriate in the future. The Policies have been drafted to be suitably flexible and there are allowances for site specific viability pressures to be taken into account at the planning application or pre-application stage.
- In relation to the SUE proposals at H2:1 we are also mindful of the viability negotiations linked to a Section 106 agreement for the first phase of the SUE (800 homes being brought forward by Lioncourt homes).

It is our view therefore that the Council has maintained a clear understanding and awareness of development viability pressures, their relationship to the deliverability of new homes and jobs and any potential cumulative impacts by building in allowances where appropriate. It therefore remains our view that there are no requirements within the Plan that would render any site undeliverable or unviable. Should issues arise however we consider the Policies within the Plan sufficiently flexible to respond to these issues.

**j) The land is in different ownership. How will the development be phased to ensure the timely provision of supporting infrastructure and community facilities? What mechanisms are in place to ensure this?**

Further to our response to part 'h' of this statement, we highlight our intended approach to having supported Masterplans for the comprehensive development of the 2 SUE's (as highlighted in policy H2). Notwithstanding we are aware of a number of parties suggesting comprehensive Masterplans are not an essential requirement and that the infrastructure can be delivered in a suitable and comprehensive way without being guided by an overarching Masterplan. In principle we can understand and respect this view. Having regard to the proposed developments already presented by Lioncourt and Barratt's we recognise that significant strides are already being made to provide for the necessary infrastructure in advance of a masterplan being produced.

Although a masterplan approach remains our preferred position, and we are aware that some effort has been made to bring land owners together, should this not prove possible to produce we would seek to secure the necessary contributions through Section 106 agreements in the short term before such time as CIL was introduced and supported the on-going delivery. Given the multiple ownership issue at Keresley, we are mindful that CIL is likely to provide an important aspect of supporting infrastructure delivery in order to overcome the restrictions around the pooling of Section 106 contributions. Prior to its adoption (which is expected by April 2018) we are confident that Section 106 agreements will be manageable for securing contributions on a pooled basis.

**k) Are there any significant constraints or barriers to the development of this site?**

The perceived constraints and existing environmental assets have been identified through the Councils Green Belt Matrix Assessment and can be mitigated. Indeed, such assets will be harnessed and fully integrated to ensure a sympathetic and sustainable residential living environment. For example, the retention of medieval fishponds, ancient woodlands and hedgerows will be maintained and integrated into the proposed development.

Although we do not consider this a significant barrier or constraint to the overall delivery of the SUE it is important to highlight the proposed link road as part of the SUE. We have already discussed this through a previous letter to the Inspector (LP131), but would again clarify the position in this statement.

One of the key delivery aspects of the SUE is the proposed link road connecting Long Lane with Winding House Lane. This is a key piece of infrastructure to support the distribution of highway traffic around the site and the wider area. As part of the link road proposals the City Council have identified opportunities to work with Highways England and the County Council to explore medium-long term enhancements to the M6 Junction 3 and the strategic route that connects the M6 to the north and the A45 to the west. This would include the new link road as a part of this strategic connectivity. The City Council have also explored opportunities with ProLogis Park and Nuneaton and Bedworth Borough Council to support additional growth of Pro-Logis Park to help justify the connectivity of the link road at Winding House Lane. The strategic improvements between the M6 and A45 would also support greater highways resilience for Pro-Logis with enhanced connectivity both east and west. This work remains on-going as part of the Nuneaton and Bedworth Borough Plan as it predominantly rests outside of the city's administrative boundary.

With regards the indicative master planning of both the Lioncourt and Barratt proposals (which surmount to the first 2 phases of the Keresley SUE providing more than 1,200 homes) the opportunity to incorporate the link road is already considered and identified. The City Council has already confirmed to both parties its expectations of the link road and how this can be incorporated into the planned developments as part of the spine road network.

In terms of the wider strategic improvements to the M6, we are expecting this to be supported by devolution deal funding (linked to the West Midlands Combined Authority programme) amongst other sources. We expect this money to come on stream between 2021 and 2026 helping to unlock the completion of the link road (especially at the Winding House Lane junction), which in turn would support the parallel and subsequent delivery of the later phases of the SUE.

**l) What are the proposed timescales for delivery of this site?**

We draw attention to our response to part 'f' of this statement which discusses the projected delivery of this site



**m) What are the implications of the site and/or supporting infrastructure not coming forward within the anticipated timescales for delivery of the Plan's housing and development strategy?**

The Plan has been prepared with a view to new homes being delivered in tandem with supporting infrastructure in order to promote and support sustainable development. This is particularly important with the 2 SUE sites. Should anything materialise that prevents or significantly delays the delivery of homes within the SUE's then it would be difficult to confidently project the full development of the sites within the Plan period. At this time, we have made no reliance for the delivery of homes within the first 5 years of the Plan period and as already discussed there is a strong likelihood that this will change following the adoption of the Plan. As such, this does provide a degree of flexibility, in that delivery can be brought forward and spread across a longer time frame.

In terms of infrastructure both sites require significant provisions, most notably in highways and education terms but also in relation to health care and green/blue infrastructure. Based on educational needs and the current approach to provision the delivery of new schools sits very much with the 'market'. We are aware of a range of interest in delivering free schools and academies across Coventry and see no reason why these sites could not support this in principle. The largest risk to delay is associated with highways. Our modelling work shows the importance of the link road being completed to ensure appropriate traffic flows are supported around the North West corner of the city. We fully expect the delivery of this road to be supported through the road network within the different phases and remain confident that its delivery will be secured in a timely manner.

We point towards the first phase of the Keresley SUE already benefiting from an approval to grant planning consent subject to a completed Section 106, which will secure a notable contribution towards the infrastructure requirements of the SUE as a whole.

### **3. Allocated Site H2:3 – Walsgrave Hill Farm**

#### **a) How would the development of the site contribute to the aims and strategic objectives of the Local Plan?**

Site H2:3 has been identified with a view to contributing positively to the aims and objectives of the Plan as a whole and supporting the delivery of sustainable development. Indeed, as one of the largest allocation within the Plan it is expected to make a significant contribution to the city housing delivery and the diversification of its housing offer. The site also has potential to expand as part of a cross-boundary development in partnership with Rugby Borough, with such a proposal already included in the Borough Councils Local Plan Preferred Option. It is important to stress though that the delivery of the site within Coventry's administrative boundary is not dependent upon land within Rugby Borough being allocated in their respective Plan.

In housing terms, the site first and foremost is considered to respond positively to objective 7 as it is considered suitable and appropriate for providing new homes to meet the needs of local people. It has the capability of providing a range of property types and tenures to support housing pathways and housing options for all aspects of the population. Indeed, the Council have ensured that through the site assessment and identification process that all sites proposed for allocation do offer opportunities for varied types and tenures of homes, offering a flexible supply of land to support the market in responding to changes in demand in a quick and appropriate way.

In relation to Objectives 2, 3, 5 and 6 in particular the Local Plan (and the sites allocated within it) is clear that development must be supported by appropriate infrastructure. This is especially true for this development, where opportunities to support onsite delivery of infrastructure are likely to become of greater relevance. The Council has sought through its evidence base, its engagement processes and its policies (including the IDP) to understand and identify the infrastructure needs of the site and what is required to support the proposed level of growth. We have clearly considered:

- Highway impacts and mitigation requirements;
- Public transport and active travel needs, aims and connections;
- Education needs at all levels;
- Health care requirements and expansion opportunities;
- Green and blue infrastructure;
- Public realm programmes;
- Sustainability principles including environmental measures to mitigate issues such as flood risk;
- Utility requirements to support growth; and
- Social and emergency services

Although we have placed all aspects of infrastructure on an even footing, the issues relating to transportation, green infrastructure and the public realm are central to these objectives. Through the allocation of this site therefore we see:

- key opportunities to enhance access to public transport;

- Key opportunities to link new homes at Walsgrave Hill with new job opportunities at Ansty Park and Pro-Logis Ryton as well as other surrounding employment sites;
- Opportunities to connect into existing highway networks, footpaths and cycle ways;
- create high quality, useable and publicly accessible green and blue infrastructure with focal points along the river corridors and flood plains that cover the undevelopable part of the site.

Through the delivery of new homes and supporting infrastructure the Plan also promotes economic growth and the creation of new jobs throughout the city. This responds especially to Objective 1-4. In recent years the city has experienced increases in in-commuting for work with the city's housing offer being skewed towards smaller, lower value properties. This is highlighted clearly in the SHMA and the Local Plan has been developed with a view to combating this issue. The Plan is clear that in order to continue attracting business and creating more jobs for local people that the city's housing offer needs to be diversified with greater emphasis on bringing forward larger family homes whilst also offering higher value alternatives to support the upper levels of the housing pathway. The Plan is under no illusion that this will be a long term process and cannot happen overnight, however it seeks to provide a solid foundation to help kick-start the diversification in the city's housing offer and provide genuine housing alternatives to surrounding towns and cities. The site at Walsgrave Hill Farm is a key component of supporting this approach.

One overarching aspect that supports all Plan objectives is design. Throughout the development of the Local Plan and through consultation events, the Council were clear that high quality and appropriate design would be one of the primary focal points of new developments. From considering the benefits appropriate design can have to ensuring safer communities (by designing out crime) (objective 9) to looking at how it can support an enhanced built environment to raise the profile of the city (Objective 4), design has been integral in the Plans development. In terms of this site, the Plan seeks to provide appropriate design approaches that reflect the historic environment, using new development to reflect historic character through materials, setting, connectivity and infrastructure. Site H2:3 also provides opportunities to integrate listed and locally listed buildings and features into the new development, with the site of Hungerley Hall Farm a prime example. Although this introduces challenges around ensuring appropriate setting, the Council are committed to working jointly with Historic England, Highways England and the site promoters to utilise the policies proposed within the Plan to continue the work we have already undertaken through our site assessments and evidence gathering process. This will ensure that development not only respects heritage assets but enhances them and utilises them as part of excellent design, layout and onsite infrastructure.

Focusing again on overarching objectives, the Local Plan has been developed in the context of Coventry being a Marmot City. Amongst other things, this has placed important emphasis on the city's need to tackle health inequalities by focusing on active travel, improved build quality, a cleaner, greener and safer built environment (including targeted reductions in air quality) and more accessible and useable green and blue infrastructure. Objective 8 of the Local Plan is included to emphasise the importance of improving the health and wellbeing of local people and the

identification of the sites in policy H2, as well as some of the less strategic opportunities in the SHLAA, are aimed towards revitalising the built environment. This can help bring people closer to jobs, services and local facilities, promoting more active methods of travel and reducing the reliance on the car. The city also has a track record of supporting urban regeneration and delivering new areas of green infrastructure in the process. Through high quality design, we can help generate benefits for mental health. The Local Plan has also been developed around a commitment to protecting the most sensitive and highest quality green spaces from development, a commitment we feel we have maintained and one that will be essential to the retention and creation of high quality green spaces that people can utilise for leisure. The site at Walsgrave Hill Farm provides a prime example of this approach with planned enhancement along the river corridor and flood plain areas to provide a high quality green and blue corridor that runs through much of the site.

**b) Are the proposed land uses appropriate? What are the components of the proposed mixed-use elements of the scheme?**

The site is allocated within the Local Plan as a strategic housing site. The IDP identifies an opportunity to provide a new 2 form entry primary school on the site to improve accessibility and connectivity to primary school education within the local area, although this could potentially be mitigated by improved connectivity and expansion of existing primary schools. Other than this, there is not any other land uses proposed for the site. In this context we note that at least half of the site has been allocated for housing since 2001 (within the existing GDP) and was again identified as a sound housing allocation in the 2009 Core Strategy. It has however been constrained by access, an issue that is to be overcome through this Plan period in partnership with Highways England and Warwickshire County Council. This approach to site access will also support a new emergency access to the Coventry and Warwick University Hospital, which adjoins the site to the west.

**c) Is the proposed level of housing appropriate? What is the proposed density of the residential development and would it be appropriate?**

The site totals approximately 58ha across 3 parcels of land. Following the assessment process undertaken through the SHLAA however it was felt that approximately 28ha (48%) of the site would be undevelopable due to flood risk and the impact on the Hungerley Hall Farm site. This reduced the developable area to approximately 30ha. In accordance with our evidence base we have applied a density of 30dph across this site area. This approach has been deemed appropriate in order to manage the flood risk issues as well as securing sufficient land for the highway improvements and to ensure appropriate setting of the Hungerley Hall Farm site.

We consider this approach robust and justified and supportive of sustainable development principles, both in terms of environmental issues and impact on the historic environment. The density also relates well to the adjoining residential area to the west.

#### **d) How would sustainable travel choices be optimised?**

The Accessibility Chapter sets out a modal hierarchy which actively promotes and encourages the utilisation of sustainable travel choices for shorter local trips. For shorter local trips to amenities such as to schools and local shops, walking, cycling and public transport should be developed to the point of being the most attractive modes of travel.

Policy AC1: Accessible Transport Network, requires that development proposals integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes. This policy will apply to site H2:3, and therefore it will be expected that the site will be served by a range of sustainable travel modes.

Policy AC1 seeks to ensure that new developments support the provision and integration of emerging and future intelligent mobility infrastructure, including electric vehicle charging points, car club schemes and bicycle hire. These types of technologies will primarily benefit the promotion, viability and integration of sustainable travel modes and will be promoted as part of the development of site H2:3.

Policy AC3 requires new development proposals to have a Travel Plan in place. This is considered as the primary method for promoting the adoption of sustainable travel modes. This policy will apply to site H2:3.

Policy AC4 Walking and Cycling, requires that new development proposals incorporate appropriate safe and convenient access to walking and cycling routes. For larger developments such as site H2:3, financial contributions may be also be required to support improved pedestrian and /or cycling routes on the wider network. This policy also outlines plans for the delivery of a city wide strategic cycle network developed as part of the Cycle Coventry Initiative. Opportunities will be sought to create extensions to the National Cycle Network which interacts with site H2:3, as well as strategic route 4 and the orbital route.

Policy AC4 sets out proposals for a complementary network of connected Quiet Streets with the aim of creating an environment where walking and cycling are the preferred modes of transport. This concept will be prioritised through the development of the larger sites including site H2:3.

High quality cycle parking and associated facilities, such as changing, shower and storage are an important part of encouraging sustainable travel and these measures will be required as part of all new development proposals in accordance with the cycle parking standards in Appendix 5 of the Local Plan.

Policy AC5 seeks to ensure that major new development proposals have safe and convenient access to the local bus network. This would apply to site H2:3 which is likely to require the inclusion of new bus infrastructure to enable existing/new services to be fully integrated into the development site.

Policy AC5 also sets out proposals to develop a mass rapid transit network which seeks to improve sustainable access to major trip attractors such as site H2:3. All major development proposals, such as site H2:3, which are expected to create significant numbers of additional trips on the network, will be required to make appropriate provision for those routes to facilitate the integration of the rapid transit network into the development site where appropriate and feasible. The close proximity of this site to the University Hospital, a well-established transport interchange, is likely to boost opportunities for the integration of rapid transit services into H2:3.

Policy AC6 supports improved access to rail stations, including HS2, by all modes of travel. There are opportunities being developed through the West Midlands Combined Authority for improved sustainable transport links between Coventry and the HS2 interchange which would support enhanced access by sustainable modes to/from site H2:3.

**e) How would the sustainable transport corridors link to the wider transport network?**

Policy AC1 Accessible Transport Network, requires that development proposals integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes. This policy would therefore ensure that sustainable transport links are provided to integrate site H2:3 into wider transport network.

Policy AC4 requires new development proposals to incorporate appropriate safe and convenient access to walking and cycling routes, and if these links do not exist, new and upgraded routes will be required which link into established networks to ensure routes are continuous. Due to location of site H2:3, it is likely that new cycle links will be required to successfully integrate the site into an established and safe part of the existing cycle network including routes recently upgraded through the Cycle Coventry project which form part of the Orbital Route near the University Hospital.

Policy AC5 seeks to ensure that new major development proposals have safe and convenient access to the existing bus network. In areas where this is not achieved, new developments may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site and the wider transport network. The successful application of this policy is likely to require the extension of existing bus routes into site H2:3.

The proposal to develop a mass rapid transit network (AC5) will improve sustainable access to major trip attractors. This network will be integrated into major housing sites, such as H2:3 and as well as major transport interchanges including Coventry railway station and the University Hospital adjacent to site H2:3.

Policy AC6 encourages improved interchange facilities between rail and other modes of travel. It also supports the delivery of objectives in the Coventry Rail Investment Strategy for improved rail connectivity, for example, on the Coventry north-south corridor. The policy also seeks to support proposals for additional local railway

stations on the east/west and north/south rail corridor within Coventry which would help to increase the sustainable integration of the site with more strategic locations.

**f) What proportion, if any, of the residential scheme would contribute to the 5 year housing land supply?**

In responding to this question we draw specific focus to the Councils SHLAA (LP53) with particular focus on Appendix 4.

The total capacity of the site is identified as 900 dwellings, which we have projected to be delivered between 2017 and 2025. This initial projection was reflective of pre-application engagement on the first phase of the site. Following the highway proposals by Highways England however the delivery of the site has slowed slightly whilst the proposals in this Local Plan and those subject to consideration in Rugby Borough are progressed further.

In terms of the proportion of the site we felt could be delivered within the first 5 year period, the SHLAA (as submitted) made allowance for 350 homes within the first 5 years, with the remainder in the following 5 year period.

Having regard to changes in circumstance, we would expect to review this as part of our next land supply update and would concede that this number of homes is unlikely to be delivered within the next 5 year period. Having regard to our wider discussion and assumption around Green Belt sites however, we consider it reasonable to assume that the level of homes identified for this site within the first 5 year period could comfortably be covered by earlier delivery of 1 or more of the Green Belt sites. This is a clear example of the flexibility we have built into our land supply and Policy approaches.

**g) How would the Master planning approach secure high quality sustainable design which incorporates resource efficiency and responds to the local context (including the protection and enhancement of the historic and natural environment)? How would it integrate with neighbouring areas?**

Policy H1 does not propose a master planning approach for this site. Notwithstanding, we are aware that the site is in no more than 2 ownerships with clear opportunities to work jointly to bring forward a comprehensive scheme. As such, we have seen proposed masterplan layouts as part of the 2009 Core Strategy proposals and are confident that the site can be delivered in a sustainable way that respects and takes full account of the natural and historical environment.

The location and scale of the site allocation is entirely appropriate to the characteristics of a sustainable urban extension. It would be planned and developed adjacent to the existing built up area of eastern Coventry and provide key opportunities to connect into the existing highway network and pedestrian routes and linkages. This will be particularly possible from Clifford Bridge Road, Brade Drive, Farber Road and Barrow Close. The proposed density of the site is in keeping with

the adjoining area and is consistent with a suburban development. The retention of significant areas of Green Infrastructure will support drainage and flood risk within the area and also provide opportunities to invest in these areas to create high quality green and blue spaces to support a high quality built environment. Such assets will be accessible to and for the benefit of both new and existing communities. The site is also well contained within the existing urban envelope and administrative boundary with the a45 providing a strong boundary at this time (notwithstanding possible developments within Rigby Borough associated with the growth of Ansty Park etc.).

**h) Is the location and scale of the allocation appropriate to the size, form, characteristics and function of the existing nearby settlement/s?**

The location and scale of the site allocation is entirely appropriate to the characteristics of a sustainable urban extension. It would be planned and developed adjacent to the existing built up area of eastern Coventry and provide key opportunities to connect into the existing highway network and pedestrian routes and linkages. This will be particularly possible from Clifford Bridge Road, Brade Drive, Farber Road and Barrow Close. The proposed density of the site is in keeping with the adjoining area and is consistent with a suburban development. The retention of significant areas of Green Infrastructure will support drainage and flood risk within the area and also provide opportunities to invest in these areas to create high quality green and blue spaces to support a high quality built environment. Such assets will be accessible to and for the benefit of both new and existing communities. The site is also well contained within the existing urban envelope and administrative boundary with the a45 providing a strong boundary at this time (notwithstanding possible developments within Rigby Borough associated with the growth of Ansty Park etc.).

**i) Has a viability assessment been carried out? If so, what are its conclusions?**

As part of the work we have undertaken on the Local Plan we have kept a close overview of development viability. This has included the development and subsequent monitoring of our AHEVA. It has also included numerous rounds of public consultation and engagement as well as standalone meetings with site promoters. Although we have not undertaken a detailed site viability analysis we have used the above information to help confirm that the proposals in the plan are viable and deliverable in principle. For example:

- The AHEVA makes allowance for infrastructure contributions as part of its viability test.
- The AHEVA considered prices and values at the start of the plan period. We know through monitoring that if anything the viability of new homes in Coventry is improving (LP131).
- Although we recognise that some site promoters have asked for additional clarification around specific aspects of infrastructure we note that none appear to directly challenge the viability of development, the deliverability of allocated sites or the plan as a whole or challenge the identified infrastructure in principle.



- The additional requirements we have highlighted throughout the Plan (including those at site H2:3) such as additional build standards etc. are identified initially as aspirational, but also to reflect improving standards over the lifetime of the Plan. This will help to ensure the Plan remains relevant and appropriate in the future. The Policies have been drafted to be suitably flexible and there are allowances for site specific viability pressures to be taken into account at the planning application or pre-application stage.

It is our view therefore that the Council has maintained a clear understanding and awareness of development viability pressures, their relationship to the deliverability of new homes and jobs and any potential cumulative impacts by building in allowances where appropriate. It therefore remains our view that there are no requirements within the Plan that would render any site undeliverable or unviable. Should issues arise however we consider the Policies within the Plan sufficiently flexible to respond to these issues.

**j) The land is in different ownership. How will the development be phased to ensure the timely provision of supporting infrastructure and community facilities? What mechanisms are in place to ensure this?**

Our understanding through site promotion is that the site sits within 2 separate ownerships, although these are aligned and opportunities to bring forward a comprehensive scheme can be achieved. Notwithstanding, the existing track that dissects the site at Farber Road does offer opportunity to phase the site along a north/south access, which could help deliver some homes earlier and potentially in advance of the wider highway works proposed by Highways England as opportunities to connect into the existing highway network could be achieved around Brade Drive in particular. Wider infrastructure provisions are likely to be either offsite on limited on-site provisions focused around a primary school. We would expect this to be delivered as part of the phased development. In advance of this, existing facilities are projected to be able to absorb short term growth in population.

**k) Are there any significant constraints or barriers to the development of this site?**

The perceived constraints and existing environmental assets have been identified in part at least through the Councils Green Belt Matrix Assessment and can be mitigated. Indeed, such assets will be harnessed and fully integrated to ensure a sympathetic and sustainable residential living environment. For example, the long term protection of Hungerley Hall Farm and it's appropriate integration into the proposed development.

Although we do not consider this a significant barrier or constraint to the overall delivery of the site it is important to highlight the proposed highway works which feature in the development programme for Highways England. These works will see a new grade separated junction created along the A46, slightly north of the existing roundabout junction at Clifford Bride Road. This junction would then support a new

spine road running through the site, ensuring a suitable setting to Hungerley Hall Farm and new access to the development site. Such highway infrastructure also offers an opportunity to support the cross boundary development in Rugby Borough. Notwithstanding the planned removal of this land from the Green Belt, we would consider such works essential transport infrastructure in accordance with the NPPF. At this time these planned works are programmed to take place before 2021 as part of the committed development programme for Highways England.

**l) What are the proposed timescales for delivery of this site?**

We draw attention to our response to part ‘f’ of this statement which discusses the projected delivery of this site.

**m) What are the implications of the site and/or supporting infrastructure not coming forward within the anticipated timescales for delivery of the Plan’s housing and development strategy?**

The Plan has been prepared with a view to new homes being delivered in tandem with supporting infrastructure in order to promote and support sustainable development.

A key component of this site however is the proposed highways works and supporting access and blue light infrastructure contained within Highways England’s current Development Programme and scheduled to be delivered by 2021. Although there is a good chance that part of the site could be delivered in advance of such works, the full delivery of the site will be dependent upon these works being delivered and completed. Should these works be significantly delayed then there could be a risk to the full delivery of the 900 homes by the end of the Plan period.

In terms of an impact on short term delivery however we do not see this as a significant issue. As we have already highlighted other site opportunities exist to support the 5 year supply and the Plans approach to identifying a flexible and varied supply of housing land has been prepared with a view to maximising flexibility and supporting accelerated housing growth in response to a host of issues that could materialise.

In the longer term, we are mindful that we do have a small degree of flexibility within our total supply but are also mindful of the opportunity to bring forward a supporting DPD linked to delivering more homes.

#### **4. Allocated Site H2:4 – Whitmore Park**

##### **a) How would the development of the site contribute to the aims and strategic objectives of the Local Plan?**

Site H2:4 has been identified with a view to contributing positively to the aims and objectives of the Plan as a whole and supporting the delivery of sustainable development. Indeed, as one of the largest allocation within the Plan it is expected to make a significant contribution to the city housing delivery and the diversification of its housing offer. With the first phase of the wider allocation having already been completed and the 2<sup>nd</sup> phase under construction this process has already started. The site is also one of the largest urban regeneration opportunities left within the city after decades of regenerating former large employment sites.

In housing terms, the site first and foremost is considered to respond positively to objective 7 as it is considered suitable and appropriate for providing new homes to meet the needs of local people. It has the capability of providing a range of property types and tenures to support housing pathways and housing options for all aspects of the population. Indeed, the Council have ensured that through the site assessment and identification process that all sites proposed for allocation do offer opportunities for varied types and tenures of homes, offering a flexible supply of land to support the market in responding to changes in demand in a quick and appropriate way.

In relation to Objectives 2, 3, 5 and 6 in particular the Local Plan (and the sites allocated within it) is clear that development must be supported by appropriate infrastructure. This is especially true for this development, where opportunities to ensure wider public access to the sports pitch and the realignment of the estate road to support appropriate highway use are important aspects. The Council has sought through its evidence base, its engagement processes and its policies (including the IDP) to understand and identify the infrastructure needs of the site and what is required to support the proposed level of growth. We have clearly considered:

- Highway impacts and mitigation requirements;
- Public transport and active travel needs, aims and connections;
- Education needs at all levels;
- Health care requirements and expansion opportunities;
- Green and blue infrastructure;
- Public realm programmes;
- Sustainability principles including environmental measures to mitigate issues such as flood risk;
- Utility requirements to support growth; and
- Social and emergency services

Although we have placed all aspects of infrastructure on an even footing, the issues relating to transportation, green infrastructure and the public realm are central to these objectives. Through the allocation of this site therefore we see:

- key opportunities to enhance access to public transport (with notable examples of rail connectivity);

- Key opportunities to link new homes with the regenerated industrial uses on the site and within the surrounding area;
- Opportunities to connect into existing highway networks, footpaths and cycle ways; and
- create high quality, useable and publicly accessible green infrastructure

Through the delivery of new homes and supporting infrastructure the Plan also promotes economic growth and the creation of new jobs throughout the city. This responds especially to Objective 1-4. In recent years the city has experienced increases in in-commuting for work with the city's housing offer being skewed towards smaller, lower value properties. This is highlighted clearly in the SHMA and the Local Plan has been developed with a view to combating this issue. The Plan is clear that in order to continue attracting business and creating more jobs for local people that the city's housing offer needs to be diversified with greater emphasis on bringing forward larger family homes whilst also offering higher value alternatives to support the upper levels of the housing pathway. The Plan must also however keep site of the need to deliver affordable homes for local people. The Plan is under no illusion that this will be a long term process and cannot happen overnight, however it seeks to provide a solid foundation to help kick-start the diversification in the city's housing offer and provide genuine housing alternatives to surrounding towns and cities. The site at Whitmore Park is a key component of supporting this approach. In addition, the site itself also offers an opportunity to regenerate the existing employment uses on site, with much of the site experiencing high levels of vacancy and derelict buildings, the existing provisions is unattractive to the market. This also reflects the changing face of industry and the amount of land required to generate economic growth and facilitate job creation.

One overarching aspect that supports all Plan objectives is design. Throughout the development of the Local Plan and through consultation events, the Council were clear that high quality and appropriate design would be one of the primary focal points of new developments. From considering the benefits appropriate design can have to ensuring safer communities (by designing out crime) (objective 9) to looking at how it can support an enhanced built environment to raise the profile of the city (Objective 4), design has been integral in the Plans development. In terms of this site, the Plan seeks to provide appropriate design approaches that reflect the surrounding area. Site H2:4 also provides opportunities to integrate locally listed building features into the new development, with parts of the frontages to Holbrook Lane proving a prime example.

Focusing again on overarching objectives, the Local Plan has been developed in the context of Coventry being a Marmot City. Amongst other things, this has placed important emphasis on the city's need to tackle health inequalities by focusing on active travel, improved build quality, a cleaner, greener and safer built environment (including targeted reductions in air quality) and more accessible and useable green and blue infrastructure. Objective 8 of the Local Plan is included to emphasise the importance of improving the health and wellbeing of local people and the identification of the sites in policy H2, as well as some of the less strategic opportunities in the SHLAA, are aimed towards revitalising the built environment. This can help bring people closer to jobs, services and local facilities, promoting more active methods of travel and reducing the reliance on the car. The city also has

a track record of supporting urban regeneration and delivering new areas of green infrastructure in the process. Through high quality design, we can help generate benefits for mental health. The Local Plan has also been developed around a commitment to protecting the most sensitive and highest quality green spaces from development, a commitment we feel we have maintained and one that will be essential to the retention and creation of high quality green spaces that people can utilise for leisure. The site at Whitmore Park provides a prime example of this approach with the planned improvements to accessibility of the sports fields and opportunities to invest in the adjoining parklands and improve accessibility and setting.

**b) Are the proposed land uses appropriate? What are the components of the proposed mixed-use elements of the scheme?**

The proposed land uses on this site are considered wholly appropriate. They have been informed firstly by 2 planning consents (one which has been fully implemented and the scheme completed and the other currently under construction) and secondly by pre-application discussions and indicative site designs and layouts. Together the 3 parts of the site would relate well to the surrounding residential area, support enhancements to the highway network, improvements to the surrounding parks and green infrastructure and deliver land for new homes and employment opportunities. In total the scheme would deliver:

- 730 homes (of which 106 are complete, 47 under construction and 76 more with extant permission);
- 8ha of employment land
- The retention and improved access to the onsite sports field.

**c) Is the proposed level of housing appropriate? What is the proposed density of the residential development and would it be appropriate?**

As already mentioned, the site has been considered in 3 parcels. The first parcel has recently been completed and covers 2ha having delivered 94 homes, all of which were affordable. This aspect of the site was developed at a gross density of 47dph. The second phase has extant planning permission and is now under construction. At April 1<sup>st</sup> 2015 12 homes had been completed with 47 under construction and 76 yet to commence. Development remains on-going across this part of the site. The site covers 4.2ha and is being developed at a gross density of 32dph. The remainder of the site has been considered as part of on-going pre-application discussions and covers approximately 31ha. We have considered this portion of the site thoroughly through the SHLAA process. In doing so we have had full regard to intended redevelopment of at least 8ha of the site for new and enhanced employment provisions which will be supported by the redevelopment of the remaining site for new homes. The residential element of the site is expected to be developed at approximately 40dph.

Given the continued progression of this wider site through the planning process we consider the approach to allocation and the capacity applied to it wholly appropriate.

#### **d) How would sustainable travel choices be optimised?**

Policy AC1: Accessible Transport Network, requires that new development proposals integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes. This policy will apply to site H2:4, and therefore it will be expected that the site will be served by a range of sustainable travel modes. The site is brownfield land within an existing urban area, so it already benefits from some established sustainable transport networks.

Policy AC1 seeks to ensure that new developments support the provision and integration of emerging and future intelligent mobility infrastructure, including electric vehicle charging points, car club schemes and bicycle hire. These types of technologies will primarily benefit the promotion, viability and integration of sustainable travel modes.

Policy AC3 requires new development proposals to have a Travel Plan in place. This is considered as the primary method for promoting the adoption of sustainable travel modes. This policy will apply to site H2:4.

Policy AC4 Walking and Cycling, requires that new development proposals incorporate appropriate safe and convenient access to walking and cycling routes and where these links do not exist, new and upgraded routes will be required. For larger developments such as site H2:4, financial contributions may be also be required to support improved pedestrian and /or cycling routes on the wider network. This policy also outlines plans for the delivery of a city wide strategic cycle network developed as part of the Cycle Coventry Initiative. Opportunities will be sought to deliver and integrate this network into site H2:4 including improved linkages to the City Centre on routes 17, 1, 2 and the orbital route.

Policy AC4 sets out proposals for a complementary network of connected Quiet Streets with the aim of creating an environment where walking and cycling are the preferred modes of transport. This approach could be applied to site H2:4.

High quality cycle parking and associated facilities, such as changing, shower and storage are an important part of encouraging sustainable travel and will be required as part of new development proposals. The expected level of provision is set out the cycle parking standards in Appendix 5 of the Local Plan; this includes standards for residential dwellings.

Policy AC5 seeks to ensure that new major development proposals have safe and convenient access to the existing bus network. In areas where this is not achievable, new developments may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site. Although the area around site H2:4 is served by existing bus services, it will be important to ensure they are easily accessible and well integrated into the site.

Policy AC5 sets out proposals to develop a mass rapid transit network which seeks to improve sustainable access to major trip attractors. Major development proposals

such as site H2:4 will be required to make appropriate provision for those routes, including new infrastructure to facilitate the integration of the rapid transit network into the development site and the wider transport network.

Policy AC6 supports improved access to rail stations by all modes of travel, improved interchange between rail and other modes of travel and improvements to the Coventry North/South rail corridor. Opportunities will be sought to provide improved access by sustainable travel modes to the new Arena Station and Coventry Station.

**e) How would the sustainable transport corridors link to the wider transport network?**

Policy AC1 Accessible Transport Network, requires that development proposals which are expected to generate additional trips on the transport network should integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes. This policy would therefore ensure that sustainable transport links are provided to integrate the development site into wider transport networks.

Policy AC4 requires that development proposals should incorporate appropriate safe and convenient access to walking and cycling routes and those routes must appropriately link into established networks to ensure that routes are continuous.

Policy AC5 seeks to ensure that new major development proposals have safe and convenient access to the existing bus network. In areas where this is not achieved, new developments may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site and the wider transport network.

Policy AC5 sets out proposals to develop a mass rapid transit network which seeks to improve sustainable access to major trip attractors. Major development proposals which are expected to create significant numbers of additional trips on the network, such as site H2:4, will be required to make appropriate provision for those routes, including new infrastructure to facilitate the integration of the rapid transit network into the development site and the wider transport network where feasible and appropriate.

Policy AC6 encourages improved interchange facilities between rail and other modes of travel. It also supports the delivery of objectives in the Coventry Rail Investment Strategy for improved rail connectivity, for example, on the Coventry north-south corridor.

**f) What proportion, if any, of the residential scheme would contribute to the 5 year housing land supply?**

In responding to this question we draw specific focus to the Councils SHLAA (LP53) with particular focus on Appendix 4.

The first portion of the proposed allocation has already been completed with the second portion actively underway. This aspect of the site, which fronts Beake Avenue, will fully contribute towards the 5 year land supply. Based on the apparent success of this site thus far and having regard to on-going pre-application discussions we have expected further phases of the wider allocation to come on board after the existing phase is completed. At this time a planning application has not materialised for the next phase of the allocation but is expected in due course. As such, our 5 year supply projections at April 1<sup>st</sup> 2015 included an allowance for a further 400 homes to be delivered from this allocation inside the next 5 year period. The remaining 100 homes would be delivered in the next 5 year period. These delivery rates reflected similar completion rates experienced on other such sites across Coventry.

**g) How would the Master planning approach secure high quality sustainable design which incorporates resource efficiency and responds to the local context (including the protection and enhancement of the historic and natural environment? How would it integrate with neighbouring areas?**

Policy H1 does not propose a master planning approach for this site. Notwithstanding, the 2 phases of the development which have progressed already through the planning process have both been supported by masterplan layouts. As part of our pre-application discussion the remaining part of the site has also be subject to high level masterplan proposals, which have helped to inform our assessment of the site through the SHLAA.

The site provides key opportunities to connect into the existing highway network and pedestrian routes and linkages. This will be particularly possible from Holbrook Lane, Burnaby Road and Beake Avenue, whilst supporting a remodelled Swallow Road which will generate benefits to the wider highway network. The proposed density of the site is in keeping with the adjoining area and is consistent with an urban area regeneration scheme. The retention of significant areas of Green Infrastructure and opportunities to generate investment in existing sites will support further community connections and benefits.

**h) Is the location and scale of the allocation appropriate to the size, form, characteristics and function of the existing nearby settlement/s?**

The location and scale of the site allocation is entirely appropriate to the characteristics of a large regeneration site. The site is actively being planned and developed as part of the existing urban area, regenerating former vacant land that had become a focus for anti-social behaviour and an eye-sore within the local community. Once complete we expect this site to relate well in character to a number of other recent regeneration schemes by providing an urban village feel within the heart of the city.



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**i) Has a viability assessment been carried out? If so, what are its conclusions?**

Both the completed part of the site and the aspect currently under construction have not been considered as part of the work undertaken on viability due to the progress already made.

The third aspect of the site has been subject to detailed viability appraisal as part of pre-application discussions with a view to agreeing appropriate levels of development and the sort of financial contributions available under section 106. This work was undertaken in 2013 and identified that the scheme was viable but with reduced contributions to affordable housing. We are not able to publicise this assessment due to commercial sensitivity. It did suggest a viable delivery of the remodelled road, retained sports field and a sizeable contribution towards the employment land delivery.

We would highlight however that as part of this appraisal we always felt the property sale values attached to the site were low relative to schemes already being developed within the surrounding area. These concerns have been justified in recent months and years having regard to the values being marketed and achieved at the current development at Beake Avenue. As such, it is our view that since the initial work was undertaken in 2013, the viability position of the remainder of the site has improved markedly.

**j) The land is in different ownership. How will the development be phased to ensure the timely provision of supporting infrastructure and community facilities? What mechanisms are in place to ensure this?**

The land does sit in a number of different ownerships; however we do not expect this to hinder the delivery of the overall allocation proposal. Indeed, the first phase (in 1 ownership) has been completed. The 2<sup>nd</sup> phase (in a separate ownership) is under construction with a number of homes already completed. The remaining part of the allocation sits in 2 separate ownerships and the Council have held pre-application discussions with both parties, jointly and independently. Both parties are committed to delivering the regeneration of the remaining area and discussions remain on-going.

Based on our pre-application discussions thus far, we are advised that the employment site would be regenerated first (to the east of the site), maximising other buildings in this area to maintain the function of existing employers whilst new facilities are constructed. In tandem an additional phase of residential development would be brought forward (more to the west and south) and then further phases rolled out as additional land becomes available. The highway realignment and improvement would also take place in tandem. The retention of the sports field could be confirmed early in the process.

As such, based on our experiences thus far we see no reason to expect that different ownerships will, in this case at least, cause difficulty in delivering the site as a whole.

**k) Are there any significant constraints or barriers to the development of this site?**

The most significant barrier facing the regeneration of the remaining part of this site is potential land remediation and highway improvements. Notwithstanding we are aware that the first 2 phases of this wider site have progressed without any significant concerns in both regards, which provides a strong degree of confidence when projecting the future delivery of the remaining site.

**l) What are the proposed timescales for delivery of this site?**

We draw attention to our response to part 'f' of this statement which discusses the projected delivery of this site

**m) What are the implications of the site and/or supporting infrastructure not coming forward within the anticipated timescales for delivery of the Plan's housing and development strategy?**

The Plan has been prepared with a view to new homes being delivered in tandem with supporting infrastructure in order to promote and support sustainable development. The first part of this site has already been completed and the second part of the site is well progressed. We are aware that part of the remaining area has already been cleared and pre-application discussions remain on-going with a view to bringing development forward. As such, it is our view that the timely delivery of the site is not dependent on significant infrastructure costs or delivery that would delay the completion of new homes. We remain confident therefore that the site will continue to deliver new homes and jobs during the Plan period to the benefit of the local area and city as a whole.

## **5. Any Other Matters**

There are no further issues we wish to raise in relation to these matters.