

Sent by EMAIL ONLY to planningpolicy@coventry.gov.uk

22/9/2023

Dear Sir/ Madam

Response by the Home Builders Federation to the Coventry Local Plan Reg 18 consultation

1. Please find below the Home Builders Federation (HBF) response to the First Draft Local Plan 2020-2040. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year. HBF have not commented on every policy only those of relevance to our members.

General Comments

2. HBF note that this consultation characterises the Reg 18 Local Plan consultation as part of a review and update of the Local Plan rather than a new plan. If this approach is being taken, then plan review should be looking at how well the ambitions and policies in adopted Local Plan are being delivered and what changes are needed to ensure delivery. It is noted for example that some of the allocated housing sites have yet to come forward. A review of the plan should include what measures are being undertaken to help ensure they do.
3. The Planning Advisory Service (PAS) Toolkit for Local Plan Review <https://www.local.gov.uk/pas/plan-making/local-plan-review-update/nppf-2021-local-plan-route-mapper-toolkit-reviewing-and> is a useful aid for a Local Authorities undertaking reviews of their Local Plan. It provides a template to help consider and document which policies, if any, are out of date. HBF were unable to locate a completed version of this toolkit on your website.
4. HBF would argue that roughly halving of the housing numbers in the plan, when compared to the standard method calculations, is a significant change. We suggest that change at this level of magnitude is not consistent with a simple review of the Local Plan. Such a change has implications for the scale



and location of growth of Coventry, and its surrounding area, that the result is effectively a whole new plan for the area. The HBF cannot reconcile how the scale of changes being proposed represent changes that will still enable the strategic vision and spatial strategy in the adopted Local Plan to be delivered.

5. It is interesting to note there are no consultation questions on the Vision in the current Local Plan which “embraces growth” and is inextricably linked the resulting Levels of Growth proposed in the Plan. The tightly bound nature of the city requires some of this growth agenda to be addressed under the Duty to Cooperate. Clearly this section will need significant reworking to reflect the significant reduction in the level of growth now being proposed. HBF would suggest this is a key part of the Plan and respondents should be able to question and challenge the principles which the Council say underpin the ‘Review of the Local Plan’ and result in such a significant reduction in housing numbers, rather than being the pro-growth plan it was purported to be.
6. The current adopted Local Plan covers the period from 2011-2031, the revised plan is looking to cover the period from 2021-2041. If this is effectively a whole new plan, delivering against different objectives, it should be honest enough to say so. A new plan would require a new evidence base and other documentation to support it.
7. It is also unhelpful that the chapter numbers used in the consultation do not consistently match the Section Numbers used in the Local Plan, which creates unnecessary complexity and potential confusion. For example, ‘Connectivity’ is Section 12 in the adopted Local Plan, but Chapter 13 in the consultation.

Chapter One: Introduction

8. No questions to respond to.

Chapter 2: Health and Wellbeing (Section 2 in adopted Local Plan)

Policy HW1: Health Impact Assessments (HIA)

QUESTION 1

Do you have any comments on our proposal to expand policy HW1 so that all major developments are required to demonstrate how health issues have been considered and addressed either within the Design and Access Statement or separate supporting health statement?

9. HBF recognises that health is an increasingly important public policy consideration. Health Impact Assessments (HIAs) can make a useful contribution to plan-making and scheme design, but their use needs to be proportionate. HBF would support the continuation of the current

requirements and thresholds in Policy HW1, which the Local Plan Inspector found 'ensure the requirements of the policy would not be overly onerous in respect of development required to deliver the Plan's proposed objectives'¹.

10. If change is deemed to be needed, then the option to consider health impacts through *either* a Design and Access Statement (DAS) *or* HIA would be supported.
11. HBF has been unable to find a Health Impact Assessment that has been undertaken for this Reg 18 Local Plan Review consultation. HBF suggest this would be a useful piece of work especially as it would need to consider the impact of reduction in new housing being planned for on the health of Coventry residents. As the consultation acknowledges housing is a key determinant of health with high quality new housing offering significant health benefits.
12. HBF also note that an undated version of the Health Impact Assessment Supplementary Planning Document (HIA SPD) is available from the Council's website. Clearly, any changes the adopted Local Plan policy would require the HIA SPD to be reviewed. It would be helpful for the Council to set out when this will be undertaken.
13. It is also noted that policy HW1 refers to CIL, even though elsewhere in the Plan the Council are proposing to remove such a reference (see comments on Policy IM1). HBF would support the retaining of the reference to CIL at this time, even though this would need to be kept under review as the plan progressed. Whatever approach is used consistency is essential.

QUESTION 2

Do you have any comments on the proposed checklist and its content?

14. The proposed status of the checklist is unclear. The consultation refers to the suggestion of an 'expanded health policy', but then suggests this could result in a 'checklist'. Would this 'checklist' be a new policy in the Local Plan, an add on to an existing policy, additional wording in the supporting information, an SPD, non-statutory guidance, or merely information for applicants?
15. The consultation also suggest that the checklist would apply 'For those developments which would not trigger the need for a full Health Impact Assessment' the checklist would require developers to demonstrate (where relevant) how their proposal considers the issues listed, which are – Climate Change, Housing, Transport and Accessibility, Education and Employment, Access to Green and Open Space, Social Infrastructure, Designing Safe and Healthy Places, Environmental Hazards, Food Environment. This seems a

¹ Report on the Examination of the Coventry Local Plan 2011 – 2031, Para 117, Page 28

disproportionate requirement to seek on every planning application that does not require a HIA.

16. Although HBF questions the value of, and need for, further health policy in the Local Plan, if a 'checklist' approach was adopted, it would need to be informative, clear and helpful and not create confusion. It should help set out what is expected. HBF would question whether each of the suggested criteria would be not just relevant to every major development, but also if the criteria are appropriate, necessary and justified.
17. HBF suggests an alternative approach to Health policy should be taken in the Local Plan. We would suggest treating health more like a golden thread running through the document, than does not require any new and overarching policies. The health issues raised are already considered in other policies within the Plan and it seems unnecessarily repetitive and unreasonable for a checklist to require every major application (not accompanied by a HIA) to consider these issues again.
18. HBF would further question the suggestion that the issue of health should be addressed "through the validation criteria, requiring applications to address the aforementioned health related topics through their Design and Access Statements, or through a supporting health statement". Any policy requirements should be in the Local Plan, but as previously stated HBF do believe the need for any additional health policy is required.
19. HBF offer the following comments on each individual criterion of the proposed 'checklist':
 - *Address the causes and consequences of climate change (cross reference to climate change policy), mitigating for potential negative health impact.*

It is not possible for a single development to address the 'causes' of climate changes. This issue of ensuring development considers the impact of climate change is already covered by climate change policies. It is unclear how a developer could show compliance with this requirement as currently written. If what is meant by this criterion is that development should consider the health impact of extreme heat, increased rainfall and extreme weather events, resulting from climate change, it should say this explicitly.
 - *Be well-connected to encourage active travel and public transport use (cross reference to transport and environmental management policies).*

This should be covered in transport policies, and through the role of Active Travel England as a statutory consultee on planning applications.
 - *Support the delivery of, or use of, essential community services and social infrastructure for the inclusion of all members of society, which includes accessible childcare facilities, health services, day centres, educational*

facilities, healthy food options and a range of other formal and informal uses (cross reference to community policies).

As acknowledged in the bullet point itself this criterion duplicates existing policy and is therefore unnecessary and potentially confusing.

- *Promote the diversity of all groups in society and the inclusion of vulnerable groups.*

It is unclear how a developer could show compliance with this policy.

Although the HBF strongly supports the equality, inclusion and diversity, policy must assist developers in understanding what they need to do to comply with any policy requirements. If the intention is that the Design and Access Statement needs to set out how issues impacting vulnerable groups has been considered, it needs to say so explicitly. HBF would question if a validation checklist is the appropriate mechanism for considering this issue. The Local Plan Equalities Impact Assessment should consider the impact of the Plan's policies on vulnerable groups. As such planning applications that seek to comply with adopted policies should not need to revisit this issue.

- *Promote well designed and safe places that are inclusive, but which design out crime and feel safe for all members of society (cross reference to design policies)*

This matter should be addressed in the Design Policies. As acknowledged in the bullet point itself this is a duplication of existing policy and is therefore unnecessary.

- *Address neurodiversity, with developments having regard to how different people experience and interact with the world around them, and how the layout and environment created will impact on them, their health, and their enjoyment of space with an emphasis on legibility, permeability, use of landmarks, open spaces, street furniture, and the hierarchy of and access to busy and less busy spaces.*

Although the HBF is supportive of efforts to address diversity in all its forms, it is unclear how a developer could show compliance with this policy. If the Council wish to promote the role of planning in considering neurodiversity signposting to existing advice and guidance would seem a more proportionate and reasonable approach that requiring a developer in a Design and Access Statement to show how their development has considered this issue. Such an approach seems unreasonable.

- *Promote the development of high quality and well-designed housing for all, which includes the provision of energy efficient affordable and social housing, retirement housing, housing with care, sheltered housing / homeless accommodation and housing that is adaptable to reflect the different stages of people's lives. There should also be a higher emphasis on the provision of*

carefully orientated private outside amenity space in all housing developments (cross reference to housing policies) which could mean balconies in high density areas coupled with access to high quality public realm.

The matter of Design should be addressed in the Design Policies. The mix, type and tenure of housing and accessibility and adaptability requirements should be addressed in Housing Policies.

- *Promote improvements to the existing housing stock in the city to ensure it is free from damp, is well insulated and energy efficient.*

It is unclear how most new developments would be able to show compliance with this policy. However, the role of new housing in providing well insulated and energy efficient housing should also be recognised.

- *Provide and protect access to open space, children's playgrounds, allotments and leisure and recreation facilities to promote active lifestyles; the greening of developments; and the increase in biodiversity and wildlife; and to mitigate the impacts of the urban heat island effect and of flooding and urban drainage, all of which contribute to the physical and mental health and wellbeing of residents (cross reference to Green Infrastructure policies).*

This matter should be addressed in the Green Infrastructure Policies. As acknowledged in the bullet point itself this is a duplication of existing policy and is therefore unnecessary.

- *Promote vibrant town centres that provide people with access to a diverse range of uses, whilst seeking to avoid the overconcentration of uses that can have a negative health impact, for example Hot Food Takeaways, betting shops, etc. (cross reference to retail and centres policies).*

This matter should be addressed in the Retail and Centres Policies. As acknowledged in the bullet point itself this is a duplication of existing policy and is therefore unnecessary. It is unclear how a house builder could do anything to address current existing neighbouring uses within their scheme.

- *Promote a diverse local economy to meet a range of needs and skills.*

This matter should be addressed in the Economy chapter. If there are any particular health impacts intended by this reference to the local economy, these need to be explicit and not inferred.

- *Support measures to promote walking and cycling (cross reference to transport and accessibility policies).*

This matter should be addressed in the Transport and Accessibility Policies and through the role of Active Travel England as a consultee on planning applications. As acknowledged in the bullet point itself this is a duplication of exiting policy and is therefore unnecessary.

- *Minimise exposure to and improvements in air, noise and vibration, and light pollution (cross reference to environmental management policies).*

This matter should be addressed in the Environmental Management Policies. As acknowledged in the bullet point itself this is a duplication of exiting policy and is therefore unnecessary.

- *Promote digital inclusion across all parts of the city with access and training in the use of the internet available to vulnerable groups.*

It is difficult to see how this is necessary to make a development acceptable in planning terms. All requirements for developer contributions and on-site provision must be set out in policy and comply with the CIL tests.

- *Contribute to local health infrastructure where this is justified and relevant to the and where there is a genuine and evidenced funding gap (cross reference to infrastructure policies).*

This should be addressed in the Developer Contributions Policy. As acknowledged in the bullet point itself this is a duplication of exiting policy and is therefore unnecessary.

20. HBF may wish to add further comments once the status of the 'checklist' is clarified.

21. HBF has also reviewed the Council's SPD on Health Impact Assessments.

This would seem a more appropriate place to provide additional guidance on how to do a HIA. It seems perverse that more policy (or guidance) would be in the Local Plan for major development proposals that do not require a HIA to ones that do.

QUESTION 3

Given the significant implications development proposals can have on people's physical and mental health, what do you think the proportional threshold for housing developments requiring a full HIA should be:

- Unchanged – 150 dwellings or more – please explain why
- 100 dwellings or more – please explain why
- 50 dwellings or more – please explain why
- Other – please explain why

22. HBF would support the continuation of the current requirements and thresholds in Policy HW1, which the Local Plan Inspector found 'ensure the requirements of the policy would not be overly onerous'²

QUESTION 4

In terms of Outline applications and given how development proposals can change between outline approval and the reserved matters stage, when should HIAs and health checklists be required?

- At Outline stage only – please explain
 - At Outline and reserved matters stage – please explain
23. The use of HIA must be proportionate. Requiring a HIA for a reserved matter application that is delivering within the parameters of an agreed outline, would seem disproportionate.

Chapter 3: Review of the Overall Levels of Growth and the Duty to Co-operate (Section One in the adopted Local Plan)

Policy DS1: Overall Development Needs

QUESTION 5

Do you have any comments on the Council's view that it should be using the HEDNA figure with the 35% uplift removed to establish its local housing need?

24. Paragraph 61 of the NPPF requires that in order to “determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.” Therefore, the Government requires Local Planning Authorities to use the standard method to calculate our housing need in all but exceptional circumstances.
25. The use of the 2014 population projections are an integral component of the standard method and therefore any departure from using them would be required to be exceptionally justified and reflect current and future demographic trends and market signals.
26. HBF note that the Council questions the validity of the 2014 population projections. Using the standard method as set out in Government policy would require Coventry to deliver 3,188 homes each year as a minimum

² ibid

(using 2021 as the starting point, at least 63,760 homes over the plan period to the year 2041). However rather than using the 2014 figures required by the standard method, the Council is seeking to use the 2021 census figures instead. This results in a reduction in the housing requirements for 1,964 homes a year (at least 39,280 homes over the plan period to 2041).

27. HBF is sympathetic to the concerns of the Council in relation to the 2014 population figures. HBF acknowledge that this longstanding issue and although demographic change would not normally in itself be enough to justify a departure from the standard method, the longstanding issues of student population numbers in Coventry could be the kind of exceptional circumstances envisaged in the NPPF. However, it must also be recognised that rebasing figures against the 2021 Census is not a panacea to the problem and that the Census is not perfect. The 2021 census was undertaken during the COVID pandemic and as such may also have issues around representative and reliability, especially in relation to students, many of whom were studying remotely during the pandemic. Although HBF is sympathetic to the need to critically consider the 2014 baseline in the standard method, and the notion that this change may be justified, the Council's other departures from the standard method are clearly not justified.
28. In addition to the significant reduction in housing requirement switching from the 2014 to the 2021 figures creates, the Council is also intending to compound the situation further by removing the 35% urban uplift. No evidence or justification is given for this change other than that the Council 'does not agree' with it. The removal of the urban uplift further reduces the housing requirement for Coventry to only 1,455 homes each year or 29,100 over the plan period to 2041.
29. HBF note that issues around the population projections for Coventry are longstanding. The adopted Local Plan (page 44) already mentions the perceived problems with the census data and the unattributable population growth. Indeed, the adopted Local Plan indicates that this matter had been considered in the Joint SHMA that informed the Objectively Assessed Need in the adopted Local Plan, the method used before the standard method was introduced.
30. HBF also notes Icen, the Council's consultants, support a deviation from the 2014 projections, but then their work goes on to then apply the standard framework method to the revised figures. Having arrived at a revised figure Icen continue to apply the other elements of the standard method including the application of the urban uplift. This is the approach Icen have adopted for other studies elsewhere, for example in Birmingham and in Leicester and Leicestershire. Icen's work in Leicestershire has identified an unmet need for the city that is now being planned to be met in the Local Plans of the neighbouring Leicestershire authorities. This is how the system is intended to work. If Coventry is unable to meet all of its needs within the boundary, the

unmet need should be identified and accommodated within the neighbouring authorities. Just deciding to remove the urban uplift, is unreasonable, unjustified and unsound.

31. In seeking to utilise the standard method but change two key elements of its methodology the Council is not utilising the standard method. It is in fact proposing to use an entirely different method, from the standard method, to calculate housing need. As such the approach must be justified by exceptional circumstances.
32. The Council's own evidence indicates a worsening housing crisis in Coventry, with affordability become more problematic and a significant need for affordable housing. Even if the census data issues create the exceptional circumstances to justify departing from the 2014 figures, HBF cannot see how and further departures from the standard method is justified. There is no justification for the removal of the urban uplift, which is a national policy requirement. Currently the Council seems to be proposing an approach to the housing requirement that seeks to actively make it as small as possible, without providing good evidence or reason to do so. Such an approach also runs completely contrary to the current and future demographic trends and market signals that the NPPF requires any departure from the standard method to consider.
33. The Government has made it clear that it still supports the national target of 300,000 new homes per year. The urban uplift is part of securing this delivery across the country. The standard method housing requirement has always been the minimum starting point for setting the housing requirement, and HBF support more housing than the standard method housing requirement in order to support economic growth, provide a range and type of sites and to support small and medium house builders. There is a need to provide a range and choice of sites, a need for flexibility and viability considerations to be taken into account and a need for the Council to consider whether higher levels of open-market housing are required in order to secure the delivery of affordable housing and/or support economic growth.
34. NPPF para 60 still requires that in order "to support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay".
35. HBF cannot understand how the approach in the revised plan represents proactive planning to meet the housing need of Coventry and the wider area envisaged in the adopted Local Plan- where unmet need was going to be proactively planned for in neighbouring areas. The 'new' methodology seems to have been artificially contrived to make the housing requirement as low as

possible, without the exceptional circumstances that would be needed to justify such a deviation from the standard method.

36. HBF notes that some developer and land promoters have put forward alternative methods of calculating housing requirement, based on the framework of the standard method, but accepting a departure from the 2014 figures. Lichfield's work has undertaken more detailed research and analysis of the problem with the 2014 figures and how this should be addressed in plan-making. HBF support the need for a robust understanding of the issues around the problems with the housing projections in Coventry whilst at the same time using the framework of the standard method to calculate the housing requirement. HBF would be supportive of this approach.
37. In relation to the urban uplift HBF do not agree that Coventry Council can simply decide to discard this element of the standard method. The Council's own consultants seem not to support this approach as the HEDNA report prepared by Icenii still utilises the framework of the standard method, including the affordability ratios and urban uplift. It only adjusts the census population in a way that it believes addresses the issue with the census data. Even if HBF were to accept that the longstanding issues with the census data rare sufficient justification for a departure from the standard method, as the Council's consultants suggest, the recommendation from the very same consultants is that having updated this data source from 2014 to the 2021 census the framework of the standard methodology should then be applied to this figure. The Council seem therefore to have cherry picked the bits of the consultant report they like and ignored those they don't, seemingly in a conscious attempt to artificially minimise housing numbers.
38. To suggest that the approach the Council is adopting is a standard method with just a couple of tweaks- using 2021 census figures and removing the urban uplift is entirely disingenuous. The use of 2014 figures and the inclusion of an urban uplift is an integral of the standard method. The Council needs to be clear and explicit in the choices it is seeking to make, and apply the tests in NPPF to see if it is justified in doing so. HBF strongly suggest it is not.
39. In relation to the Duty to Cooperate, page 11 of the adopted Local Plan sets out the Council's position in relation to Housing Need for Coventry. The adopted Plan states that "the city can accommodate between 24,600 and 25,000 homes. As such, it is not possible to deliver the city's full housing needs within the city boundary and a shortfall of at least 17,800 homes exists. Even without the significant level of unmet need the annualised rate of growth projected for the city (1,230 per annum on average) continues to represent a step change in regular housing growth within Coventry. It will also represent for the first time in over 50 years that the city has seen significant expansion of its urban area".

40. This section of the adopted Plan continues “as a result, the Council have worked openly and constructively with its neighbouring authorities to agree a Joint Memorandum of Understanding (MoU) on housing delivery (2015) to support all Local Plans for Coventry and Warwickshire. This MoU is unchanged following the 2014 based data as the overall needs of the HMA remain stable and continued to be planned for in a positive way. At the time of writing this MoU has been endorsed by five of six authorities and seeks to demonstrate that the full needs of the HMA will be planned for over the course of the plan period. This approach has been progressed through the Duty to Cooperate (DtC) to help provide as much certainty as possible about how the city’s full housing needs will be delivered”.
41. The approach set out in the adopted Local Plan forms the basis for plan-making across the wider Coventry area. Neighbouring authorities have been actively planning to accommodate some of the unmet needs from Coventry, as required under the Duty to Cooperate. For Coventry to suddenly change tack in relation to the amount of housing needed in their area undermines ongoing plan-making in other authorities. Such an approach seems completely unreasonable in the midst of a national housing crisis.
42. Although the Housing topic states that “the new Housing and Economic Development Needs Assessment (HEDNA), published in December 2022, which has been produced jointly by partners across Coventry and Warwickshire”. It says nothing further about the impacts of the reduced housing numbers on neighbouring authorities and/or the Duty to Cooperate.
43. HBF note that on minimal changes are proposed to Policy DS2: The Duty to Cooperate, which talk about how the unmet housing needs of Coventry will be addressed by neighbouring authorities. HBF cannot see how the change to the housing numbers proposed in this ‘Review’ would not trigger the need to fully review the previous Duty to Cooperate work undertaken to support the adopted Plan, and a full review of Policy DS2. Such a review requires Coventry Council to engage in ongoing discussions with neighbouring authorities about the impact of such changes on their Local Plan production. HBF have been unable to locate any evidence of these considerations being addressed as part of this Reg 18 consultation.
44. HBF have been unable to find an updated Memorandum of Understanding in relation to housing need, agreed with all the neighbouring authorities. Such a document would seem to be an essential part of any proposed plan ‘review’ which seeks to introduce such a significant change of approach to housing numbers across the wider HMA.

QUESTION 6

Do you have any comments in relation to the alternative growth scenarios, or other options which the Council should consider?

45. HBF strongly support the need for more housing in the Coventry area for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing, supporting employment and retail growth. The plan-led system requires Council to proactively plan to meet the needs of their community. The proposed changes in the Review of the Coventry Plan, fails to do this, and as such do not comply with National Planning Policy Framework and Planning Practice Guidance.
46. HBF suggest the Council should start with the standard method calculation, (albeit we recognise there may be an argument to be had around whether there is need to be a substitution of the 2014 figures for an alternative) and then consider whether an uplift in the housing requirement is needed to support economic growth of the City and the Region. The Plan should then provide for a range of allocated sites, included small sites and have policies that support additional housing in response to regeneration and other opportunities.
47. Although HBF are sympathetic to the Council's arguments that an alternative to be mandated 2014 ONS may be appropriate. There may also be issues with the census data that need consideration as it was undertaken during the pandemic. Suggesting the Plan is still applying the standard method whilst using this alternative data and also removing the mandatory 35% uplift for urban areas is disingenuous. The Council are in fact arguing for an alternative approach, and as such this should be subject to additional scrutiny, suggesting the Plan is applying standard method is simply not true.
48. HBF support more housing than the standard method housing requirement in the Coventry Local Plan in order to support economic growth, provide a range and type of sites and to support small and medium house builders. There is a need to provide a range and choice of sites, a need for flexibility and viability considerations to be taken into account and a need for the Council to consider whether higher levels of open-market housing are required in order to secure the delivery of affordable housing and/or support economic growth. The Council needs to fully consider each of these factors both on their own, and in combination, to see if additional housing is required.

QUESTION 7

49. Do you have any comments on the overall Employment Land Needs for Coventry?
50. HBF supports the need for a pro-growth pro-recovery agenda. This means more housing should be provided within the Coventry HMA to support economic growth. Recognising that Coventry City is a tightly bound area, this

is likely to require neighbouring authorities to accommodate some of the growth under the Duty to Cooperate.

Policy DS2: Duty to Cooperate

QUESTION 8

Do you have any comments on our proposed amendments to Policy DS2?

51. As mentioned above, see in particular response to Question 5, HBF note that under current planning legislation, policy and guidance the Duty to Cooperate is an important part of the plan-making process. HBF believe that the scale of changes being proposed by the Plan review, and in particular the Council's decision to depart from the Standard Method of assessing housing need, is a significant issue that requires detailed consideration of the knock-on implications for plan-making within neighbouring authorities. This must be addressed through an updated Duty to Cooperate Statement and ideally a Memorandum of Understanding.

Policy DS3: Sustainable Development Policy

QUESTION 9

Do you have any comments on our proposals to update Policy DS3?

52. HBF is unclear what changes are being proposed to Policy DS3 as they are not stated in the consultation, and reference is made to the emerging draft Climate Change Strategy. HBF are therefore unable to comment on this matter but would wish to do so once any proposed changes to the policy are available for comment.

Policy DS4- Masterplans

QUESTION 10

Do you have any comments on our proposed updates to Part A of policy DS4?

HBF do not comment on individual sites. However, as the consultation document acknowledges the issue of design has increased in prominence in national planning policy in recent times. HBF would therefore question the extent to which additional guidance is needed in the Local Plan. If any additional Design Guidance is needed this should be in the Design Policies, to avoid confusion and repetition.

QUESTION 11

Do you agree that we should make a minor change B, C and D in terms of changing the references to use classes to reflect new legislation?

53. HBF do not comment on individual sites, however as a general point HBF does not support the need for additional policy requirements on biodiversity and green infrastructure, increased tree coverage, wildlife-friendly buildings, green spaces, health indicators or climate resilience to be added here to existing policies within the Plan. If any changes are needed these should be made to the relevant existing policies e.g. Biodiversity, Climate Change or Health policies, to avoid repetition and confusion. As the plan should be read as a whole, such repetition is unnecessary.

Chapter 4: Jobs and Economy (Section 3 in adopted Local Plan)

QUESTION 12 to QUESTION 17

54. HBF have no comments in response to the questions 12 to 17 in this Chapter

Policy JE3: Non-Employment Uses on Employment Land

QUESTION 18

Do you have any comments on our proposed changes to JE3 Part 1a?

55. The HBF agree that the Plan should recognise that the closure of an existing employment site may present an opportunity for appropriate redevelopment including new homes. HBF agree that if a site is clearly not suitable for employment due to the reasons cited, then marketing should not be required.

QUESTION 19

Do you have any other comments regarding policy JE3?

56. This is one policy where repetition of the changes proposed elsewhere could usefully be repeated to assist with clarification and policy interpretation. It is noted that the Council is intending to be explicit that "For the purposes of supply (and therefore monitoring) we propose that this (definition of employment) relates to: Class E Part g (i to iii), plus classes B2 and B8" and that "For the purposes of decision making we propose that this (definition of employment) relates to: Class E Part g (i to iii), Classes B2 and B8, and other uses which can clearly demonstrate that they serve an employment purpose in the local economy."
57. There is therefore a need to be explicit about which definition of employment land is being used when seeking to apply Policy JE3.

QUESTION 20 to QUESTION 26

58. HBF have no comments in response to questions 20 to 26.

Chapter 5: Housing (Section 4 in adopted Local Plan)

Policy H1: Housing Land Requirements

QUESTION 27

Do you have any suggestions to Policy H1 which can help us meet our housing need within our area?

1. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1 (in the online version this can also be found in 'response templates')
2. An area you think could be densified which still achieving a high standard of living? Please provide as much detail as you can
3. A site you would like us to investigate to see if it might be suitable for housing? Please provide as much detail as you can
4. Another suggestion or comment – please provide detail

59. The consultation sets out that the Council “consider that this policy needs updating in terms of the quantum of development. The starting point will be the strategic options for growth as set out in our review of Policy DS 1. We are asking for comments in that section: Overall Development Needs.”

60. HBF strongly disagree with the proposals to reduce the amount of housing being planned for in Coventry, and therefore disagree with this proposition, see our comments in response to Questions 5 and 6.

61. The consultation continues that “once we have determined what figure we think sets an appropriate strategic need we need to look at what can realistically be delivered within Coventry’s administrative area.”

62. HBF agree that having established the housing need through the standard method, or an alternative method that will be subject to increased scrutiny, NPPF requires that need should be met as close to where it occurs as possible. HBF therefore support the approach of seeking to provide as much new housing as possible within Coventry’s administrative boundary but recognises that this is likely to be challenging and some of the need will remain unmet, and need accommodating in neighbouring authorities.

63. HBF agree that the NPPF is clear that a ‘brownfield first’ approach is needed, but it must also be recognised that housing on greenfield sites is essential to address the housing crisis and ensure a range of sites are provided to deliver a range of housing reflecting the mix, type and tenure.

64. Recent government announcements³ are seeking to provide further housing within existing settlements, which is why the disregard of the 35% urban uplift seem to run counter to current and emerging government policies which focuses new housing delivering in existing places.
65. The consultation suggests current calculations indicate the following housing land supply from 2021 – 2041 (although the current adopted Local Plan only covers the period 2011-2031):

Housing Land Supply	Number of Homes
Past net completions	3,818 (21/22 monitoring year)
	1,620 (22/23 monitoring year)
Call for brownfield sites	1,200 (approx.)
Sites with planning permission (includes those under construction but not completed)	11,914
Local Plan allocations- remaining capacity	3,151
Windfall	3,000 (2026 onwards)
Total	125,158

66. HBF note that the existing and new site allocations will be tested in due course at the Local Plan Examination. The HBF would not wish to comment on individual sites proposed for allocation, but it is noted that the Council will need to provide a site by site analysis to check of the deliverability of individual site allocations. Our responses are submitted without prejudice to any comments made by other parties, but it is critical that the Council's assumptions on lapse rates, non-implementation allowances, lead in times and delivery rates contained within its overall HLS, 5YHLS and housing trajectory are correct and realistic. These assumptions should be supported by parties responsible for delivery of housing and sense checked by the Council.
67. HBF note that the windfall allowance seems high. National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply (para 70). The Council should confirm that the existing and new/revised policies will not impede windfall sites from coming forward at the same rate as past delivery.
68. As set out in the NPPF⁴, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies and take into account relevant market signals.

³ See for example <https://www.bbc.co.uk/news/uk-politics-66287810>

⁴ NPPF, Paragraph 31

69. As set out in the NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 69a). The Council should ensure that the Local Plan is consistent with the NPPF. The Council should allocate additional sustainably located small sites to help provide certainty for SMEs.
70. The NPPF sets out that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para 74).

Housing Trajectory

71. HBF have been unable to find an updated Housing Trajectory that shows the impact of the proposed changes to housing policy against the updated information on supply. Such information is important to enable full engagement with the house building industry on these proposals. It is important to be able to understand the impact of the changes on both the housing requirements and the housing supply and how these elements interact together.

Policy H2: Housing Allocations

QUESTION 28

Do you have any comments on the review of Policy H2 (Housing Allocations)?

72. HBF agree that this policy will need updating and should reflect the current position on the housing allocations as summarised in the consultation document. HBF notes that the document says "in line with feedback from comments relating to the review Policy H1 we will need to consider whether we should allocate further sites or identify areas where densities could be increased."
73. HBF comments on density can be found in response to Question 48
74. As already noted, HBF disagree that housing requirement for Coventry should be reduced as is currently being proposed. However, whatever housing requirement is used in the Plan, HBF would suggest further site allocations are needed to provide choice and competition within the land market and to address the need to allocate small sites to support SME builders.

The Need for Small Sites

75. As set out in the NPPF (para 69a) at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or demonstrate strong reasons for not achieving this target. The Local Plan (and supporting information) needs to set out how is the Council intending to meet this requirement. HBF support the allocation of small sites to meet the 10% requirement to ensure it is delivered and to support SME builders.
76. The HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have.
77. If Councils are to ensure there is a wide variety of SME house builders operating in their administrative areas, and the benefits it brings to the speed of delivery and variety of homes, they must ensure that there is a variety of sites. This is why the Government, through the NPPF, now requires local authorities to allocate sites of varying sizes and why the HBF advocates for the allocation of more small sites in local plans. HBF would encourage the Council to undertake an analysis of the allocated sites (and other sources of supply) to assess, if this 10% small sites allowance is being met.
78. It also will be important for the Plan's policies and evidence base to set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by paragraph 69 of the NPPF. The Council should ensure that the Local Plan is consistent with the NPPF. The Plan should allocate sustainably located small sites to help provide certainty for SMEs. This should be in addition to any windfall allowance.
79. The HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%.
80. The HBF report State of Play: Challenges and Opportunities Facing SME builders, may be a useful reference for the Council about the range of challenges facing SME builders. It is available here

https://www.hbf.co.uk/media/documents/HBF_Report_-_SME_report_2023v2.pdf

Policy H3: Provision of New Housing

QUESTION 29

Do you have any comments, including supporting evidence which can help us address Policy H3 on introducing standards which can help us proactively address climate change in terms of residential development?

81. Whilst the HBF is supportive of the journey to net zero and the role house builders can play in this, this matter is already being addressed in the Plan. No further policies on net zero are needed within the Housing section, as this would be repetitive and potentially confusing.

Other Residential Development Standards

QUESTION 30

In relation to Policy H3 do you have any comments on our proposals for introducing new policy on amenity?

82. HBF do not support further policy guidance on suitable residential environment within Policy H3, to do so would be repetitive and potentially confusing. HBF agree a reference the recently adopted New Residential Design Guide Supplementary Planning Document, the Open Space SPD, and the Householder Design Guide SPD are needed within the Plan, but question whether Policy H3 is the appropriate place to do this. It is important to remember that the Local Plan sets policy, and the adopted SPDs provide additional guidance on it. Changes to the policies that the SPD hang from may result in the need to revisit and update the SPDs.
83. The Open Space SPD should be referred to in the Open Space policy section, the Householder Design Guide in the Design policies section and These include broad accessibility standards, reference to 'adequate amenity space and parking provision' and to be safe from environmental pollutants. There is no need to further strengthen the policy in terms of amenity within the housing policy, if any changes are needed this should be done in the relevant section of the Plan, not repeated here.
84. HBF support the need to update Policy H3 and the Plan to reflect the most recent Government definitions including definition 'First Homes' (instead of 'Starter Homes'). HBF would also support an approach that gives more emphasis to different housing types. There has been diversification of housing products in both the market and the affordable housing sector. However, if the development of these new products is to be recognised within

the plan, this must be accompanied with an understanding of the different deliverability and viability factors affecting these new types of housing provision.

QUESTION 31

In relation to Policy H3 do you think we should require development to demonstrate how it has taken the Building for Healthy Life Principles into account?

85. HBF is supportive of use of Building for a Healthy Life toolkit but note that it is not really a 'standard' to be achieved, but rather a toolkit for considering design and thinking about the qualities of successful places. The Local Plan would need to be clear about what 'demonstrating how it been taken into account' would entail, and what information would be needed to show that a development would achieve it.
86. The HBF agree that a link to the latest version of Building for a Healthy Life <https://www.udg.org.uk/publications/othermanuals/building-healthy-life> and its companion technical guide <https://www.gov.uk/government/publications/streets-for-a-healthy-life> could usefully be included with the Plan.
87. HBF is supportive of the use of best practice guidance but believe the use of Building for a Healthy Life should remain voluntary rather than becoming a mandatory policy requirement. The Council should signpost such guidance in its supporting text rather than in policy wording.
88. It would seem unreasonable and disproportionate for a planning application for individual dwelling to have to undertake a full Building for a Healthy Life assessment and indeed it is not designed for such use.

QUESTION 32

In relation to Policy H3 do you have any comments on our proposals to adopt the National Described Space standards?

89. Any policy which seeks to apply the optional nationally described space standards (NDSS) to all dwellings should only be done in accordance with the NPPF (para 130f & Footnote 49), which states that "policies may also make use of the NDSS where the need for an internal space standard can be justified". As set out in the NPPF (para 31), all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.

90. PPG⁵ identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
- Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
 - Viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
 - Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.
91. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. Merely saying the City is tightly bound is not enough.
92. HBF also remind the Council that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council's policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.
93. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.
94. If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed

⁵ PPG ID: 56-020-20150327

introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.

QUESTION 33

In relation to Policy H3 do you have any comments on our proposals to introduce specific policy which supports Build to Rent in Coventry?

95. HBF would support the need for a policy which supports Build to Rent Schemes. We agree the Council should adopt the NPPF definition of Build to Rent. This could be included in the Glossary of the Plan.
96. HBF agree that the viability of Build to Rent differs from that of a typical mixed tenure development and therefore the consideration of affordable housing within Build to Rent needs to be looked at differently. HBF suggests the Council should undertake specific viability work and engagement with Build to Rent providers to ensure that the Council has a full understanding of the specific issues facing Build to Rent sector.
97. HBF note that the Council intends to rely on the Planning Practice Guidance⁶ advice that 20% is a suitable benchmark for the level of affordable private rent homes to be provided and managed in perpetuity. However, the PPG⁷ also states that “the guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark”.

QUESTION 34

In relation to Policy H3 do you have any comments on our suggestion to introduce specific policy which supports Co-Living in Coventry?

98. HBF supports the need for a policy on Co-Living schemes within the City, however such a policy needs to recognise that development economics of Co-Living are likely to be different from standard development models, owing to the need to provide communal spaces (as is the case for Retirement Housing).
99. Co-living housing should be modelled within the whole plan viability assessment and the Council should work with providers of such housing schemes to ensure they fully understand the locational, viability and deliverability needs of the sector. This information is needed to inform any policy requirements to include affordable housing (discounted private rent) to ensure such a policy is evidenced, justified, viable and deliverable.

⁶ PPG Paragraph: 002 Reference ID: 60-002-20180913, Revision Date: 13 09 2018

⁷ *ibid*

100. The suggestion of cash in lieu of on-site provision of affordable housing within a Co-Living scheme will be needed to provide flexibility for schemes where on site provision is not appropriate, assuming an affordable housing contribution is justified and viable. HBF would not support the suggestion of an annual affordable housing contribution in perpetuity as this would seem unjustified and unreasonable.

101. In relation to NDSS, as mentioned above (see HBF comments on Question 32) the PPG⁸ requires the Council to provide evidence to support the policy and to consider the need, viability and timing of such a policy.

QUESTION 35

In relation to Policy H3 do you have any comments on whether we should set a limit on how much co-living we should allow so that we are able to review its impact over time given that it is an emerging model? If you think we should, what should the limit be, and what evidence could we use to provide robust and fair justification?

102. HBF suggest that there is no need for the Plan to limit the number of co-living developments in the city, as the market will do this through supply and demand. HBF suggest the Council could usefully allocate sites in locations it would support such development to help to de-risk the planning permission process for such schemes.

QUESTION 36

In relation to Policy H3 do you have any comments on our proposal to introduce a policy on Custom and Self Build Housing?

103. HBF note that the HEDNA recommends that the Local Authorities develop a specific policy for Custom and Self Build Housing and suggests the Council should consider whether to require a percentage of large sites to deliver self and custom plots in the areas of highest demand.

104. HBF agree that it is not appropriate for the Coventry Local Plan to include a policy that requires allocated sites to provide a particular percentage of plots for custom and self-build. HBF note that Council is proposing to include a separate self and custom build policy. HBF suggest this policy should be a criteria-based policy that sets out where custom and self-build housing will be supported.

105. In general, the HBF does not consider that requiring major developments to provide for self-builders is appropriate. Instead, the HBF

⁸ PPG, ibid

advocates for self and custom-build policies that encourage self and custom-build development by setting out where it will be supported in principle. The HBF considers that Councils can play a key role in facilitating the provision of land as set in the PPG. This could be done, for example, by using the Councils' own land for such purposes and/or allocating sites specifically for self and custom-build home builders- although this would need to be done through discussion and negotiation with landowners. HBF would therefore support the allocation of sites specifically for self and custom build housing.

106. One of the reasons for not supporting a percentage policy for custom and self-build relates to deliverability. It is considered unlikely that the provision of self and custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity.
107. It is important to note that the HEDNA does not suggest a blanket policy of requiring all sites to include self-build plots. So, before any policy was introduced the Council will need to provide evidence of high demand for self-build on a locational basis. This evidence should form part of the evidence base for the Local Plan and be consulted on to enable full public scrutiny and comment. The lack of this analysis is another reason HBF does not support a percentage policy for self and custom build.
108. HBF agree that it is important that any plots should not be left empty to the detriment of neighbouring properties or the whole development. HBF is pleased that the Council have recognised this issue. However, HBF would not support a fallback mechanism that required self and custom build plots that have already been made available and marketed for at least 12 months and have still not been sold to either remain on the open market as custom build or be offered to the Council or a Housing Association before being built out by the developer.
109. HBF is of the view that any policy should include a timescale for reversion of these plots to the original housebuilder if they remain unsold. This should be as short as possible from the commencement of development because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self and custom builders.

QUESTION 37

110. We propose to delete the part of Policy H3 which supports limited infill in the Green Belt as this is contrary to national Green Belt policy. Do you have any comments on this?

111. HBF note that currently Policy H3 supports custom and self-build on limited infill within existing ribbon developments within the Green Belt. It is noted that the Council intends to delete this element and instead seek to steer self and custom build development to brownfield sites through a positively worded policy. HBF suggests the custom and self-build policy needs to do more than just direct this type of housing to brownfield sites. To do so is unlikely to reflect the aspirations of custom and self-builders or enable the Council to meet their obligations. The need for some greenfield housing development in Coventry Council area (and the wider HMA) must be recognised.

QUESTION 38

In relation to Policy H3 do you think we should allocate a brownfield site(s) specifically for self and custom house building? If yes, how might we ensure such a site can be delivered?

112. HBF is generally supportive of the need to allocate sites for housing, particularly smaller sites which can provide a range and choice of sites, and support small and medium size house builders. However, the allocation of sites for housing, including small sites, and sites for self and custom build housing, should not be limited to only brownfield sites. The need for some greenfield housing development in Coventry Council area (and the wider HMA) must be recognised.

QUESTION 39

In relation to Policy H3 do you have any comments on the inclusion of support for Community-Led Housing in this proposed new policy?

113. HBF would not object to the Local Plan supporting community-led housing. The Council should consider whether allocations and/or a criteria-based policy is appropriate. However, if the Council is to allocate sites for 'non-standard' types of housing, as suggested in the proposed changes to Policy H3, a full understanding of the delivery and viability of such schemes, including timescales and potential for non-completion, must be reached before such schemes can be viewed as contributing to the 5 year housing land supply or longer term housing supply.

114. HBF also notes that the Council suggest that the Affordable Housing SPD should positively support community-led housing schemes, however this would require a change to adopted policy and then a subsequent review of the SPD, not the other way around.

Policy H4: Securing a Mix of Housing

QUESTION 40

Do you have any comments on our proposed minor revisions to Policy H4 (securing a mix of housing)?

115. HBF would support the updating of this policy to refer to the Housing and Economic Development Needs Assessment (HEDNA), whilst retaining flexibility to enable the latest evidence to be utilised.

Policy H5: Managing Existing Housing Stock

QUESTION 41

Do you have any comments on the review of Policy H5 Managing Existing Housing Stock?

116. HBF note that yet again the Council is seeking to add references to other existing policies within the plan to this policy. Policies on Energy Efficiency are already included in the plan. Any changes should be made to these policies, not Housing policies. The Plan should be read as a whole.
117. HBF welcomes Policy H5 support for conversions to residential and demolition and redevelopment schemes.

Policy H6: Affordable Housing

118. The HEDNA concludes that there is a need for 941 Social and Affordable rented housing per annum, and a need for 149 Affordable Home Ownership dwellings per annum. A total of 1,090 affordable homes per annum. This is significant proportion of the 1,455 homes per annum that the Council is currently proposing.
119. HBF suggest that the Plan needs to do a lot more to address the affordable housing needs in the City in a way that is deliverable and viable. This is likely to require cross subsidy of affordable housing through Section 106 contributions paid for by developments of open market housing. The failure of the Plan and the supporting information to acknowledge understand and analysis the relationship between open market and affordable housing delivery is a significant omission.
120. HBF agree that Council's affordable housing policies need to comply with national policy requirements, including setting out the Council's approach to First Homes. HBF wish to review and comment on the further work The Council says it will need to undertake, but in general terms HBF is supportive of the need for policy wording to be flexible to allow for changing market circumstances and government and local priorities over the plan period.

121. Similarly, HBF would wish to review and comment on the whole plan viability assessment. This will be important to the level of affordable housing contributions from developers are viable, achievable and properly justified. As the Council notes the whole plan viability assessment will also need to consider the impact of the current, and any proposed new or amended policies on the viability of development. HBF suggest that consciously and deliberately limiting the amount housing being planned for over the plan period, and additional requests for developer contribution, will have a significant impact on the amount of affordable housing that can be delivered in Coventry. If the Council is serious about meeting it's affordable housing needs then additional open market housing will be needed.

122. It will also be important to recognise that different types and tenures of market and affordable housing have different impacts on site specific viability. For example, the viability of extra care schemes is affected by the provision of communal spaces and the same is true with Build to Rent. The whole plan viability assessment should consider this issue carefully in its modelling, and any policy should include flexibility to allow any site-specific viability issues to be addressed.

QUESTION 42

In relation to Policy H6 we propose that the policy should be updated to reflect the Council's preference for Social Rent as opposed to Affordable Rent. Do you agree

Yes – please comment further if you wish

No – please explain

123. HBF note that the type of affordable housing being sought by the Council can impact on viability. The impact of any policy changes must be considered in the whole plan viability assessment. HBF support policy wording that enables flexibility in relation to the affordable housing to be required, where there is a site-specific viability issue.

QUESTION 43

In relation to Policy H6 do you have any comments on our proposals regarding affordable home ownership? What evidence do you think we should use?

124. PPG⁹ requires the Council to set out its policy in relation to First Homes within their Local Plan. It also requires that "a minimum of 25% of all affordable housing units secured through developer contributions should be

⁹ <https://www.gov.uk/guidance/first-homes>

First Homes¹⁰. The Council should therefore set out in policy any proposed local criteria for First Homes in the Local Plan, provide the required evidence to support any such proposals, and facilitate consultation on them.

QUESTION 44

Do you have any other comments on the review of Policy H6 Affordable Housing including issues and evidence relating to viability which we need to consider?

125. As mentioned above, the whole plan viability assessment is a key part of the evidence base that support the Local Plan. HBF would therefore wish to review and comment on it. It is important that the inputs into the viability assessment are up-to-date and realistic and are informed by industry experience. Only then can the Council be sure that the level of affordable housing contributions from developers are viable, achievable and properly justified. The whole plan viability assessment will also need to consider the impact of the current, and any proposed new or amended policies on the viability of development. The Council needs to fully consider the implications of the re-prioritisation of its Plan, the shift away from the pro-growth agenda, and the reduction in housing numbers will have on the both the viability of schemes, and the amount of market housing and affordable housing that can be delivered.

Policy H7, Gypsy and Traveller Accommodation

QUESTION 45

Do you have any comments on our review of Policy H7, Gypsy and Traveller Accommodation?

126. HBF have no comments on this policy.

Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation

QUESTION 46

In regard to policy H8 do you have any comments on the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards)? Please provide evidence to support your views.

¹⁰ Ibid, Paragraph: 013 Reference ID: 70-013-20210524

127. The requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. The Government response to 'Raising accessibility standards for new homes' states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. There is therefore no need for this element of the proposed new policy.
128. As the consultation explains there is a need to differentiate between Part a) and part b) of M4(3) technical standards. M43a sets out standards for wheelchair adaptable housing, where M43b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights. HBF supports the recognition of this distinction and the need for policy to reflect this change. Although this is mentioned in the consultation
129. HBF are pleased to see the Plan recognises that there will be cost implications resulting from any requirements for the provision of M43a and/or M43b requirements. We therefore support the suggestion that any such policy will need to be applied flexibly. This issue will also need to be factored into the whole plan viability assessment.

QUESTION 47

Do you have any other comments on our review of Policy H8?

130. As mentioned previously the viability of extra care schemes is affected by the provision of communal spaces within the scheme. This matter needs to be considered in the whole plan viability assessment and any policy should include flexibility to allow any viability issues to be addressed.
131. HBF is supportive of measures to increase the supply of specialist older people's housing and supports the view of the Retirement Housing Group (RHG) that the planning system can do more to reflect the aging population. A recent RHG report may provide a useful point of reference for the Council <https://retirementhousinggroup.com/how-better-use-of-the-planning-system-can-increase-provision-of-specialist-housing-for-older-people/>. HBF supports the allocations of sites, in appropriate locations, to specifically to address the housing needs of older people.
132. HBF do not believe it is necessary to introduce a requirement for Building for Life into the older person's housing policy. Any attempt to do so would be repetitive and unnecessary. Although HBF is supportive of the use of Building for a Healthy Life as best practice guidance we believe it

should remain voluntary rather than becoming a mandatory policy requirement.

Policy H9: Residential Density

QUESTION 48

In relation to Policy H9 do you consider:

1. The policy is up to date and sets sufficient standards to maximise capacity already
 2. The policy could be amended to increase minimum density levels in certain locations outside the ring road? (please explain and provide evidence where applicable)
133. HBF notes that Policy H9 sets minimum densities of 35 dwellings per hectare (dph) outside of the ring road (A4053) and inside the ring road a minimum of 200 dph, and greenfield sites 30dph.
134. HBF would question the deliverability of the Council's current density policy of 200dph, which seems exceedingly high, even within the central ring road area. HBF suggest that the Council needs to undertake an assessment of the Residential Capacity of this central area to see if it is realistic. For example, Leicester's emerging Local Plan has sought to increase the density of it's Central Development Area from 50 to 75dph (which the HBF has questioned). This CDA wide increase seems to be arbitrary. The Leicester Sustainability Appraisal (page 10) suggests the increase is informed by development densities in other cities.
135. HBF would request that the Council undertake additional work to understand the current housing delivery within the City by type and tenure. Although this breakdown is available in the 2021/22 AMR¹¹, this breakdown has not been provided in previous years. The 21/22 suggests that 54% of new housing is apartments. Any continuation of this trends is unlikely to be able to meet the range of housing needs within the City.
136. Coventry's proposal of 200dph within the central ring road is four time the amount initially proposed in the Leicester Central Area and over two and half times greater than Leicester's revised current proposals. The HBF has been unable to locate any evidence of the deliverability and viability of 200dph in the Coventry central area. Density needs to be considered on a site by site basis to ensure schemes are viable, deliverable and appropriate for the site.

¹¹ <https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22> page 9

137. The deliverability of residential development within Coventry will be dependent upon the viability of brownfield sites and the demand for high density city centre living post Covid-19. It is important that delivery of the housing requirement in Coventry does not rely overly ambitious intensification of dwellings.

138. Therefore, although HBF agree that it is important that Coventry accommodate as much of our identified need as possible and this means that further work does need to be undertaken to see whether any parts of the city can accommodate increased densification, such work must be realistic. HBF would caution that this may not be appropriate in all locations, especially if you are looking to introduce densities of 200dph, or even only 75dph, or 50dph to existing residential areas.

Policy H10: Student Accommodation

QUESTION 49

Do you have any comments on our review of Policy H10?

139. HBF note the Council's observations that since the plan was adopted, monitoring has shown significant growth in Purpose Built Student Accommodation (PBSA) within the city. HBF also note that HEDNA suggests that the situation should be reviewed as the University's growth ambitions take shape as it has not been possible to quantify levels of need for the future at the present time. This situation provides further weight the need to plan proactively for new housing, including PBSA and other types market, affordable and specialist housing.

140. HBF request that the Council undertake additional work to understand the current housing delivery of PBSA and BTR within the City. Although this breakdown is available in the 2021/22 AMR¹², this breakdown has not been provided in previous years. The 21/22 data indicates 73 HMOs, 2,621 PBSA units and only 1,233 residential dwellings have been provided.

141. HBF agree that good quality housing is important requirement for universities to enable them to continue to play a key role in the local and regional economy. Indeed, the provision of market and affordable housing also supports the local and regional economy. It is important that the role of house building to the local and regional economy is recognised.

142. HBF agree that PBSA can take the pressure off the need for other forms of housing, not just housing used by students, and HBF are sympathetic to the Council's desire for PBSA should be part of a range and mix of different types of housing available the city centre.

¹² <https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22> page 9

143. Whilst HBF support the observation that other types of high density development could help to deliver a range of homes to meet local needs for example co-living, build to rent, and a range of other market and affordable products, we question the density assumption used in the Plan (see comments in response to Question 48).
144. Although HBF have no specific comments on the proposed changes to the policy wording, HBF supports a plan, monitor and manage approach being used to ensure delivery of all forms of housing, not just student housing.

QUESTION 50

In relation to Policy H10 do you have any comments on a 'monitor and manage' approach, including how this could be implemented, or any alternative ways of managing delivery which can be supported by robust evidence?

145. The 'plan, monitor, manage' should underpin the whole Local Plan, not just the delivery of PBSA in Coventry.
146. HBF note the consultation also states that the Council is considering "a range of other matters in terms of ensuring that PBSA meets the needs of its intended residents, that it delivers inclusive, safe and sustainable communities, and that it is well designed having regard to amenity and space standards, sustainable construction (including grey water development, 'living walls' green roofs, space-saving underground recycling facilities and the provision of appropriate facilities (for example a place to wash and dry laundry, shared and well maintained social space and space for preparing and eating food)"..."to ensure that student accommodation is genuinely affordable and inclusive".
147. Once again HBF notes that the Plan should be read as a whole and questions the need for further policy and guidance on environmental and design consideration within the Housing policies, when these matters should be addressed within the relevant policies elsewhere within the Plan.

QUESTION 51

In relation to Policy H10 do you have any examples of policy or evidence which would help us develop a policy relating to standards for student accommodation, to include matters of design, amenity, sustainability and mechanisms to ensure that it is truly inclusive for students from all backgrounds including the potential need for developer contributions to secure affordable tenures?

148. HFB would request the student accommodation is subject to viability modelling as part of the whole plan viability appraisal. The viability issue affecting PBSA are different from traditional open market housing for a variety of reasons including the need to provide communal space, how they are financed. HBF suggests the Council needs to work with developers of PBSA to understand these issues and inform the whole plan viability assessment of this tenure. Only then would it be possible to judge whether or not any affordable housing contribution needed, evidenced, justified, viable and/or deliverable.

QUESTION 52

In relation to Policy H10 do you have any other issues you think we should be taking into account when planning for student housing?

149. HBF note that the 2021/22 AMR¹³ recognise the importance of student housing to Coventry shows the majority of housing provided in 2021/22 is PBSA. If this fact serves as the justification for supporting such high densities in the central area, with 200dph being proposed it must be recognised that this density of housing would likely not be appropriate for anything other than student housing. This will not be appropriate for family or even working professionals looking for BTR etc. Student housing is part of the housing market, but is not the only kind of housing that needs to be planned for and provided in Coventry and the surrounding area(s).
150. The student housing issues seems to be a particular concern in relation to population projections and need in the census. HBF comments on the housing requirements, and the issues that using the 2014 population figures pose can be found in our response to Questions 5 and 6, but the HBF do not support the current proposed housing requirement for the Coventry HMA.

Policy H11: Homes in Multiple Occupation (HMOs)

QUESTION 53

Do you have any comments on our proposal to delete Policy H11 and instead make sure the Local Plan cross references to the HMO Development Plan document?

151. HBF note that the Council is currently developing a new HMO Development Plan Document which will provide new policy for HMOs. HBF has no comments on this question, other than to note the reliance on policy in the HMO DPD is appropriate once it has been adopted. DPDs forms part of the development plan and therefore can set policy, unlike an SPD.

¹³ <https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22>

Chapter 6: Retail and Centres Chapter (Section 5 Retail and Town Centre Uses in adopted Local Plan)

QUESTIONS 54 to 67

152. HBF have no comments in response to the questions on this Chapter.

Chapter 7: Communities (Section 6 in the adopted Local Plan)

QUESTION 68 and QUESTION 69

153. HBF have no comments on these questions.

Policy CO3 Neighbourhood and Community Planning

QUESTION 70

Do you have any comments on our view that Policy CO3 needs a minor update as described?

154. HBF agree that the Plan should reflect the current position in relation to Neighbourhood Planning. It is important to recognise that Neighbourhood Planning remains a voluntary activity.

Chapter 8: Green Belt and Green Environment (Section 7 in adopted Local Plan)

Policy GB1: Green Belt and Local Green Space

QUESTION 71

Do you have any comments regarding Policy GB1?

155. HBF strongly suggest that in light of the housing crisis and the known unmet housing need in the City, the Council (and its partner neighbouring authorities) needs to undertake a Green Belt review as envisaged in adopted plan and Memorandum of Understanding signed with neighbouring Councils. HBF are concerned that the halving of housing numbers is not justified and the ongoing work under the Duty to Cooperate appears to have stopped.

QUESTION 72

Do you think that Green Belt and Local Green Space should be covered in two separate policies?

156. As the consultation acknowledged the process for designation and review of Green Belt land is different from Local Green Space separate policies would seem sensible.
157. Page 83 of the adopted Local Plan sets out the exceptional circumstances that would support allocation of land for housing within the green belt. In light of the proposed reduction housing numbers this section could not simply be rolled forward into the new plan but needs to be reviewed and updated if the proposed new strategy is to be taken forward. HBF would support the retention of the existing approach and the existing wording as we believe the exceptional circumstances that justify green belt release of sites of housing remain.

Policy GB2: Safeguarded Land in the Green Belt

QUESTION 73

Do you have any comments of the review of Policy GB2?

158. HBF have no comments on this question.

Policy GE1: Green Infrastructure

QUESTION 74

Do you have any comments on our review of Policy GE1: Green Infrastructure?

159. In relation to the second criterion of the policy, if there is an intention to create green corridors for these should be identified locationally and/or on a map. If the work to support the identification of these areas is being undertaken elsewhere, for example through the Local Nature Recovery Strategy, this needs to be made clear.
160. In relation to criterion three, again any policy must be made in the Local Plan, and not in an SPD. Any policy needs to reflect the requirements of mandatory Biodiversity Net Gain and how this is intended to work in practice. It would be helpful for the Local Plan BNG policy to set out the Council's approach to making mandatory BNG work in practice. This may be an area where an SPD might be helpful, but this would need to be developed after the policy has been adopted.
161. HBF members are keen to understand the Council's role in the relation to BNG and if intends to become a responsible body. Whether the Council itself it looking to provide Habitat Bank and local BNG credits and/or its enabling role in introducing developers to BNG providers.

162. A review of the BNF topic paper will be needed to inform the Reg 19 version of this Plan.

QUESTION 75

Do you have any comments on our proposals to retain the above policy with no changes?

163. HBF have no comments in response to this question.

QUESTION 76

Do you have any comments on our suggested policy approach to strengthening and updating Policy GE3?

164. There is no need to repeat national policy in the Local Plan. Mandatory Biodiversity Net Gain will become mandatory from Nov 2023, although there is an exemption for small sites, which will be subject to BNG 10% net gain from April 2024. The Local Plan should therefore set out how the Council will ensure compliance with the national requirements, rather than setting any new policies. The requirements for mandatory 10% BNG will also need to be considering in the whole plan viability assessment.
165. The consultation seems to suggest that the Council is looking to amend part 2 of the policy to include the identification of biodiversity offsetting sites. Whilst HBF is pleased that the Council is starting to think about how BNG off-site credits may be secured, HBF would question the role of the Local Plan in 'identifying sites for off-setting'. If this is envisaged to be a safeguarding policy where council owned land, or other land that the Council has secured for biodiversity off-setting is identified, HBF would question the helpfulness of this information in light of the requirement for all off-set biodiversity net units to be recorded on the national register.
166. If the intention is to set out all the sites where off-setting may be provided, this would seem completely inappropriate, especially as the market for biodiversity off-site credits is still emerging. It will be for developers to consider how best to meet the BNG requirements and this may include on-site provision, the purchase of off-site units and as a last resort the purchase of national credits. The Council's BNG policy should set out how the developer should comply with the policy, for example what information is required to justify off-site provision, how the 30 year monitoring will be secured for off-site units, if and how this will vary when delivery is via conservation covenants as opposed to s106 agreements.

QUESTION 77

Do you have any comments on our review of Policy GE4 Tree protection?

167. HBF have no specific comments in response to this question. However, the policy must work in tandem with the BNG metric and the precautionary principle which will require developers to consider tree retention on-site as part of the BNG considerations.

Chapter 9: Design (Section 7 in adopted Local Plan)

QUESTION 78

Do you have any comments on the review of Policy DE1 (Encouraging High Quality Design)?

168. This is the appropriate location to detail any policy on Design, and not elsewhere in the Plan.
169. Policies in relation to the mix and type of houses required should be included in the Housing Policy section. It should also be noted that unless subject to age-restrictions or other policy requirement housing for sale on the open market can be purchased by someone from any demographic.
170. HBF comments on NDSS have been made in response to Question 32. If the case for NDSS is evidenced and justified, which HBF contest it is not, it would still not be necessary to repeat the requirements for NDSS in this policy when this issue has already been addressed elsewhere in the plan. If they were included, they should only be mentioned in one policy and not two. The Design policy may be the most appropriate place.
171. The Design policy may also be the more appropriate place to reference the Building for a Healthy Life criteria, rather than elsewhere in the Plan. HBF are supportive of highlighting this best practice guidance, but believe it should remain voluntary rather than becoming a mandatory policy requirement.

Chapter 10: Heritage

QUESTION 79

Do you have any comments on the review of Policy DE1 (Encouraging High Quality Design)?

172. This question seems to be an erroneous repetition of Question 78 in Chapter 9.

QUESTION 80 to QUESTION 82

173. HBF have no comments in response to these questions.

Chapter 11: Accessibility (Section 10 in adopted Local Plan)

QUESTION 83 to QUESTION 91

174. HBF have no specific comments on the Accessibility Chapter other than to note that the requirement to provide Electric Vehicle Charging Points in new homes is set out in Building Regulations, so this does not need to be repeated in Local Plan policy.

Chapter 12: Environmental Management, Minerals and Waste (Section 11 in adopted Local Plan)

Policy EM1: Climate Change

QUESTION 92

Do you have any comments on the proposed policy direction that Policy EM1 needs updating with the introduction of specific targets for mitigating and addressing the challenges of climate change and working towards achieving net zero in all new build developments?

175. HBF recognises the challenges posed by climate change, and the role that home builders can play in contributing to addressing these issues. We support efforts aimed at raising overall standards and working towards achieving net zero in new homes, but this must not result in a patchwork of local targets and policies that seek to go further and faster than can be delivered in practice.

176. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not need to set local energy efficiency standards in a Local Plan policy because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.

177. HBF would therefore question the merits of specific local targets for mitigating and addressing the challenges of climate change, rather than focusing efforts on work to ensuring national targets can be delivered and implemented.

178. HBF would also question the evidence and justification for introducing a mandatory level of canopy cover on major development, and how appropriate such a policy would be in all cases. However, if such an

approach where to be pursued it must be done through the Local Plan, and not an SPD, as SPD cannot set policy.

QUESTION 93

The consultation says “For non-domestic developments, retrofit, refurbishment and change of use schemes there is scope to achieve net zero for such proposals. The Council will be developing an Adaptation and Resilience Plan for the city but we believe the WMCA Climate Change Adaptation Plan should be considered to address this issue, including SuDS, reducing overheating risk by utilising green roofs/walls and natural shading and to reduce flood risk, alongside adopting renewable technologies to reduce reliance on grid electricity. The Council will also be seeking to encourage and support the development of net zero neighbourhoods and more liveable neighbourhoods designed in response to tackling the causes and consequences of climate change which could include community heat networks, provision for battery storage fed by renewable energy sources, infrastructure to support active travel modes and EV charging and green space, SuDS and trees to provide biodiversity, drainage and shade, alongside opportunities for community food growing.”

Do you have any comments on the above proposals?

179. Although this section ostensibly relates to achieving net zero in non-domestic developments, retrofit, refurbishment and change of use schemes. This section also indicates the Council’s intentions to encourage and support the development of net zero neighbourhoods in general and requirements for neighbourhoods to be designed to respond to climate change. Policy EM1 refers to all development; the scope of this policy needs to be clearer.
180. Again, this policy does seem to be repeating requirement already set out elsewhere in the Plan, including SUDS- which should be covered in the flood risk policy, water efficiency measures- which are already covered in Building Regs and therefore does not need to be in policy (see comments below), and flooding which should be addressed in the Flood Risk policy.
181. HBF reiterate that the Council should consider Climate Change to be a golden thread running through the Plan and not an area that requires numerous additional new policies, that add further unnecessary complexity for users of the Plan.
182. The explanation of this potential policy suggest that they are intended to be supportive policies, not a specific policy requirement. HBF would be concerned if some of these elements became mandatory, rather than just a policy looking to encourage and support the various measures referred to.

Community Heat Networks

183. HBF does not support any policy that would require new development to connect to existing district heating or cooling networks or provide new networks. The HBF does not consider it is necessary to make more connections to the heat network. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired.
184. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery, but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Councils should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.
185. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means that future price regulation is required to protect domestic consumers.
186. The CMA have concluded that "a statutory framework should be set up that underpins the regulation of all heat networks." They recommended that "the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector." The Government's latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers. The Plan should therefore not include a policy requiring connections to heating networks.

Water Efficiency Measures

187. Building Regulations already require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure.
188. As set out in the NPPF and PPG¹⁴, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement to go further than Building Regulations must be justified by credible and robust evidence, as set out in NPPF. IHBF does not believe higher water requirements are justified or necessary for the Coventry Plan.
189. The introduction of mandatory biodiversity net gain in Nov 2023 presents both an opportunity and challenge for developers. It will be important for the Council to clearly set out its BNG policy in the Local Plan. HBF comments on BNG policy can be found in response to Question 74.

Policy EM2: Building Standards

QUESTION 94

Do you have any comments (on) our suggested policy proposals in that Policy EM2 needs to be deleted and replaced with an up-to-date new policy?

190. HBF agree that the policy as written does little to add to the existing national policy requirements and could be deleted. The suggestion to replace it with a new policy is not supported. As the consultation document itself explains this issue is already being addressed through changes to Building Regulations and the implementation of the Future Homes Standards. It is therefore unnecessary and potentially confusing to repeat this in planning policy.
191. The suggestion of a new policy which includes mandating the introduction of green walls/roofs, bird, bee and/or bat boxes within new build developments comprising a suite of green features based on different scales of development is also not supported. Such solutions may be appropriate in some locations, and on some sites, but not others. There may also be other local circumstances that mean they are not appropriate.
192. Policies should set out expectations of development, enabling developers to show how they would comply with the policy requirements.

¹⁴ NPPF para 31 and PPG (ID: 56-014-20150327)

Policy should include specific requirements without specifying *how* these requirements should be met, as this will need to be informed by site specific circumstances.

193. Notwithstanding the objection to the principle of a further policy in this area, any policy would have been to be put forward and considered in the Local Plan, and not left to an SPD. SPDs cannot set policy. Only by considering all the requirements and asks of development can viability and deliverability of development be probably assessed.

QUESTION 95

Do you have any comments on our proposals for setting more ambitious standards for new build developments with the introduction of specific targets that go beyond existing Building Regulations as described above? Please provide detail including what such targets might be, and any evidence to show how these would be viable and deliverable.

194. As mentioned previously, it is the Government's intention to set standards for energy efficiency through the Building Regulations. The HBF do not support additional local targets as they can in fact serve to undermine delivery. The key to the speed and success of mitigating climate change is through standardisation and individual Council's specifying their own policy approach to energy efficiency should be avoided. It is important not to undermine economies of scale for product manufacturers, suppliers and developers. The HBF does not believe the Council needs to set local energy efficiency standards as this matter is already being addressed through Building Regulation and the 2025 Future Homes Standard.

Policy EM3: Renewable Energy Generation

QUESTION 96

Do you have any comments on our suggestions for updating Policy EM3?

195. HBF does not support the inclusion of policies that require mandatory roof top solar or small-scale ground mount such as carports, such technologies may not be suitable in all locations from a technical perspective. HBF would also question the justification and deliverability of any such policy. If the suggestion was taken forward evidence would be needed to show it did not harm viability or deliverability of housing (and other) schemes. As already mentioned, HBF have concerns about decentralised energy networks, see comments above.

Policy EM4: Flood Risk Management

QUESTION 97

The consultation says “As per the recommendations set out in the Green Infrastructure and biodiversity topic paper, this could also include strengthening the policy further by including a specific reference to the continual improvement of blue infrastructure as there is a need to achieve good ecological status in all water bodies in key wildlife areas in line with the Water Environment Regulations. Any development with potential negative impacts on water quality could be explored through the legal agreement mechanism and contribute to Section 106 funding to support these improvements.

Expanding on policy using SPD is essential to ensure that there is sufficient breadth and detail to Coventry’s overall flood risk management policy. To support and increase the effectiveness of the expansion of wildlife friendly buildings and biodiversity features, a list of preferred biodiversity features in reference to scales of development, and a list of appropriate trees, shrubs for developments to follow, with benefits for pollinators, air pollution, and hay fever, could be explored through new SPD.”

Do you have any comments on our suggestions that Policy EM4 needs updating as described above with further technical amendments to help strengthen the policy further?

196. Once again, HBF note that policy must be made in the Local Plan, and not in an SPD. Development can only be required to mitigate its own impact so there will need to be a clearly established baseline for quality of existing blue infrastructure before any contributions to mitigate the impact of new development can be justified. The Council should also think how this policy links into mandatory BNG and provide advice to applicants on this matter. This is an example of where SPD can be helpful in providing additional guidance on the implementation of adopted policy.

197. As mentioned previously, work on the implementation of BNG is ongoing. It is expected that guidance will include advice on ‘staking credits’ and there may be the potential for BNG on-site and off-site provision to contribute to other planning requirements as well including SUDs and nutrient mitigation. It will be important for the Reg 19 version of this Plan to reflect the most up to date guidance in this area.

Policy EM5: Sustainable Drainage Systems (SuDS)

The consultation says “we suggest point 2 be updated with specific reference to green roof technology and that reference to SPD in point 5 be removed to allow greater flexibility as to how such guidance be developed.”

QUESTION 98

Do you have any comments on our suggestion that Policy EM5 needs updating as described above with further technical amendments to help strengthen the policy further?

198. HBF would question any requirement for Green Roof technology to be required on all development, as it may not be technological or locationally appropriate in all cases. Once again, HBF note that policy must be made in the Local Plan, and not in an SPD.

QUESTIONS 99 to 102

199. HBF have no comments on these questions.

Chapter 13: Connectivity (Section 12 in adopted Local Plan)

QUESTION 104

Do you have any comments on our assessment of Policy C1 Broadband and Mobile Internet?

200. HBF agree that this issue is already covered by national policy, this local policy is not needed and could be deleted.

QUESTION 105

Do you have any comments on our assessment of Policy C12 Telecommunications?

201. HBF have no comment on this policy.

QUESTION 106

Do you have any comments on our proposals for a minor amendment to policy IM1? Do you have any other comments on our review of this policy?

202. HBF note that Coventry City Council has currently decided not to implement CIL and acknowledge the recent Government consultation looking at the potential introduction of the IL. However, changes to developer contributions remain uncertain, and under current regulations Coventry Council could still decide to introduce CIL at some point, and so reference to this being a possible option reflects the current position in relation to infrastructure funding options. HBF suggest at present the policy is kept as it is, but a review of it would clearly be necessary if, and when, any legislative changes to how infrastructure is funded are introduced.

QUESTION 107

Do you have any comments on the updated Infrastructure Delivery Plan at Appendix 3?

203. It will be important for the Infrastructure Delivery Plan to be kept under review and updated as the Local Plan progresses. It is noted that the IDP identifies the need for cross boundary infrastructure but this section of the IDP is blank.
204. HBF strongly suggest the Council gives further thought to this issue to ensure that growth, including new housing and its associated infrastructure is properly planned for.
205. HBF also observe that the Glossary in Appendix 4 needs to be reviewed and updated. For example, the definition of affordable housing should be expanded to accurately reflect the NPPF and PPG definitions, which include shared ownership and discounted market sale, including First Homes.

Chapter 14: Coventry City Centre Area Action Plan

QUESTION 108

What are your views on the most effective mechanisms for the future planning of Coventry City Centre? Please provide supporting evidence where relevant.

206. HBG agree with the Council that the opportunities and challenges facing Coventry City Centre are rapidly changing. The Coventry Area Action Plan was adopted in Dec 2017. As such is getting dated and doesn't reflect a post-Brexit, post pandemic world and the changing role of city centres.
207. The HBF suggest the Council needs to review the delivery of the current APP before considering how best to update/replace it. Evidence of changes impacting the city centre will be important in helping to shape a plan for its future.
208. Para 4.5 of the AAP states that plan "will continue to encourage the development of more homes within the city centre. Indeed the 2015 SHLAA has identified potential opportunities for in excess of 3,700 homes within the area, a proportion of which are already under construction. It is important though to ensure an adequate balance is made between providing enough homes for the city's student population as well as appropriate accommodation for other elements of the city's population, including: families, young professionals and older people. This will also need to include new affordable housing. The importance of this balance has been amplified in recent years with a growth in student focused developments. However; it is an area of provision the Council supports as it helps to reduce the pressure on family housing for student occupation elsewhere in the city".

209. It is important to understand if these intentions have been delivered, particularly in relation to the size, type and tenure of residential development being provided within the City Centre. It is important to understand if the delivery of new family homes within the central area is realistic. Although it is important for a range and mix of housing to be provided the HBF would question if development economics, viability and market demand suggest that the city centre sites are better suited to other types of residential development including apartments, build to rent and housing for older people. Such considerations need to feed into the spatial strategy for the Coventry Local Plan and should not be viewed in isolation.
210. As mentioned earlier, HBF is supportive of the allocation of small sites to provide a range and choice and to support SME developers. HBF is also supportive of allocations for older people's housing schemes. HBF would encourage the Council to fully consider what proactive measure it can take to support redevelopment and new housing within the City Centre including the allocation of sites for housing and mixed-use schemes.
211. HBF note that Para 4.10 of the AAP states that for the "purposes of planning retail needs for Coventry and its city centre, the higher (housing) need has been taken forward, which reflects the city's catchment area and the approach taken through the duty to cooperate to retain the city's unmet housing needs within Warwickshire and the Housing Market Area, hence continuing to retain the city's wider population within the city centres catchment zone". HBF supports the observation that housing within the HMA has a role to play in supporting the vitality and viability of the City Centre. The halving of housing numbers for Coventry proposed in the updated/new plan, can only serve to undermine this. HBF would request the Council further consider, model and evidence the impact of this significant change in approach. The negative impact of such a significant reduction in housing numbers on the local and regional economy must not be underestimated.

Future Engagement

212. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
213. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully

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