



Coventry City Council
Planning Policy Department
Floor 3, Civic Centre 4
Much Park Street
Coventry
CV1 2PY

SENT BY E-MAIL AND POST

28th April 2017

Dear Sir / Madam

COVENTRY LOCAL PLAN MAIN MODIFICATIONS CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. The HBF submit the following representations to the Council's proposed main modifications.

The proposed main modifications to **Policy DS1** as set out in Bullet Point 3 concerning the Local Plan Review are not in accordance with proposals outlined in the recently published Housing White Paper. The Government proposes that Local Plans are kept up to date and reviewed at least once every five years. This five yearly review procedure should be reflected in **Policy DS1**.

The proposed early review within 5 years of adoption should also be more clearly set out in **Policy DS1**. The issue of unmet housing needs from Coventry to be met in Nuneaton & Bedworth has moved on since the Council presented its evidence at the Coventry Local Plan Hearing Sessions in July 2016. As previously stated the Coventry & Warwickshire HMA authorities (except Nuneaton & Bedworth Borough Council) signed a Memorandum of Understanding containing a commitment to use their best endeavours to deliver housing numbers to meet in full an OAHN for the HMA of 85,540 dwellings between 2011 – 2031 (or 88,160 dwellings if 2,620 dwellings for growth arising outside the HMA are included). In meeting this OAHN there is a proposed re-distribution between Coventry city and its neighbouring authorities based on a mathematical calculation of the percentage of migration patterns / house moves and commuting patterns. The Coventry &

Warwickshire HMA authorities are expected to prepare Local Plans that reflect these agreed housing numbers subject to the completion of SHLAA work. The Memorandum of Understanding will be reviewed as a result of co-operation with authorities outside the HMA and / or monitoring which identifies that housing needs in the HMA are not been met. The Memorandum of Understanding includes a figure of 14,060 dwellings (703 dwellings per annum) for Nuneaton & Bedworth rather than the proposed housing requirement set out in the Pre Submission Local Plan. From the minutes of the latest (8th March 2017) Coventry & Warwickshire & South Leicestershire Joint Committee meeting it is understood that the Coventry & Warwickshire HMA authorities have identified that 1,902 dwellings of Coventry's housing need remains unmet and there is no shared conclusion about the capacity of Nuneaton & Bedworth Borough to accommodate more of Coventry's unmet need. Therefore other HMA authorities are likely to raise objections to the soundness of the Nuneaton & Bedworth Local Plan and possibly a failure to meet the Duty to Co-operate. In conclusion at this time there remains a level of uncertainty about whether or not OAHN for the Coventry & Warwickshire HMA will be met in full. **Policy DS1** should reflect the most up to date position concerning Coventry's unmet housing needs. It is suggested that further modifications to **Policy DS1** are required to ensure the soundness.

The HBF object to the deletion of wording from **Policy EM5**. There may be legitimate practical reasons that prevent Sustainable Drainage Systems (SUDs) been applied to all residential development schemes. It is suggested that the original wording in **Policy EM5** is re-inserted.

It is also noted that a new policy has been included in the Local Plan. **Policy EM6** concerns the redevelopment of Previously Developed Land (PDL) and its impact on water quality. The Council should confirm that any implications arising from this new policy have been accounted for in determining if residential sites included in its Housing Land Supply (HLS) are deliverable and developable especially given that 52% of the overall HLS is PDL. If sites were not assessed against the requirements of **Policy EM6** it is suggested that the new policy is removed.

For the Coventry Local Plan to be found sound under the four tests of soundness as defined by the NPPF (para 182), the Plan should be positively prepared, justified, effective and consistent with national policy. As currently proposed **Policies DS1, EM5 and EM6** do not pass these tests. It is hoped that these representations are of assistance to both the Council and Inspector in preparing the final stages of the Coventry Local Plan. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans