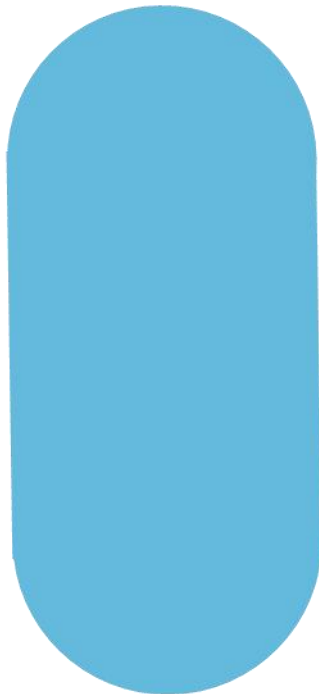


Representations

South Warwickshire Local Plan Part 1 –
Issues and Options Consultation

**HALLAM LAND MANAGEMENT LIMITED (SOUTH OF
STONELEIGH ROAD)**

March 2023





1. The following representations are made in response to the South Warwickshire Local Plan (SWLP) Part 1 Issues and Options Consultation (January 2023) on behalf of Hallam Land Management Limited (HLM), in respect of their land interest at Land South of Stoneleigh Road, Gibbet Hill and land east of Inchbrook Road (the sites). The sites have been identified as Site 103 and 104 on the Interactive Map.
2. A summary of these representations has also been submitted to the SWLP Online Consultation Portal, and should be read alongside the supporting documents namely:
 - a. Vision Document which explains how the proposed development of the sites would contribute towards achieving the five overarching principles of the Vision;
 - b. Green Belt Appraisal which assesses the likely effect of removing the site 103 from the Green Belt on the five purposes of the Green Belt;
 - c. Landscape and Visual Appraisal which assesses the likely landscape and visual effects of the proposed development; and,
 - d. Ecological Summary which assesses the site's ecological value, and provides recommendations for mitigation measures;
 - e. Biodiversity Net Gain Assessment which demonstrates how biodiversity net gains of around 30% could be achieved across both sites; and
 - f. South Warwickshire Housing Need Evidence Base Review Technical Report - this has been prepared to consider the evidence base relating to housing need in South Warwickshire, namely the HEDNA, and provides commentary and guidance on how this issue should be considered as the SWLP evolves.

Chapter 3 - Vision and Strategic Objectives

Q-V3.1: Vision for the Local Plan

3. HLM consider that the proposed Vision is appropriate in general terms. However, the proposed Vision makes reference to meeting unmet need from neighbouring authorities, and HLM consider it would be more appropriate to reference meeting unmet need from the wider Housing Market Areas.



4. Whilst Birmingham and the Black Country authorities are not neighbouring authorities of South Warwickshire, they do form part of the same Housing Market Area and therefore should not be excluded.

Chapter 4 - Meeting South Warwickshire's Sustainable Development Needs

Q-11: Sustainability Appraisal

5. The following three comments are made in respect of the SA.
6. Firstly, as a general comment, it is noted from the Introduction and description of the SWLP area that the SA has focussed on what is inside the boundary administered by the two authorities. But the SA should also recognise what is beyond the boundary, and notably Coventry as a major City on its borders that has a significant influence over the area should be recognised in the description of the area.
7. Secondly, the Appraisal has only assessed South Coventry for 50-500 homes as a reasonable alternative Small Settlement Location (SSLs) alongside a number of villages. South Coventry has a level of infrastructure, jobs, and services (not least a World Class University) which dwarfs the other SSLs and therefore is out of place in this list.
8. South Coventry is clearly more akin to the Main Settlements, and therefore Broad Locations (BL) should be appraised for up to 2,000 homes as reasonable alternatives. South Coventry as an area is sufficiently large that it could have three or more BLs in accordance with paragraph 3.6.1 of the SA. Further, having regard to Figure 3.3 of the SA, the area around South Coventry is within 800m of service provision that is either existing (e.g. bus interchange at the University, Woodfield Primary School, GP and retail facilities at the University, Tocil Wood Nature Reserve, Wainbody Wood, Crackley Woods Nature Reserve) or planned as part of the Kings Hill SUE or Coventry South Rail Station and Public Transport Interchange.
9. Finally, land has been put forward through the call for sites process in 2021 (including the HLM site 103) which could accommodate a scale of growth up to 2,000 homes in



this location, so this is a 'realistic option' having regard to Paragraph: 018 Reference ID: 11-018-20140306 of the NPPG.

10. It is not clear from the SA on what basis the HLM site has not been assessed in the SA, with only one site south of Coventry having been assessed as an SSL (C.17).
11. Having regard to Figure 3.3 of the SA, the entire HLM site falls within 800m of the existing Woodfield Primary School, and the planned Primary School which is part of Phase 1 of the Kings Hill SUE to the immediate north of the site (illustrated within the Vision Document). Whilst it is acknowledged that Woodfield Primary School is a special education school, and that the primary school at Kings Hill SUE is yet to be built, it will be within the next 5 years based on the Council's Housing Trajectory.
12. Further, the Transport Authorities for the area have consulted on a new train and bus station/interchange within the HLM site, and are planning for its delivery during the early part of the Plan period (as illustrated within the Vision Document).
13. In respect of GP surgery and local shop, all of these facilities will be provided within the Kings Hill SUE to the north of the site. This is likely to be slightly beyond 800m, however, the HLM site is of a scale such that it has capacity to accommodate a GP surgery and local shop within a local centre as illustrated within the Vision Document.
14. In respect of publicly accessible greenspace, the majority of the site is within 800m of Wainbody Wood to the north as acknowledged within the Landforms Analysis in the Settlement Design Analysis.
15. The HLM site does therefore satisfy the criteria within Figure 3.3 for primary schools and publicly accessible greenspace, and can satisfy the criteria in respect of all other elements during the Plan Period. As only one criteria needs to be satisfied, the HLM site is therefore a BL and should be assessed as a reasonable alternative.
16. An overly rigid application within the SA of Figure 3.3 that ignores planned service provision that is to be delivered early in the Plan period, and ignores potential service provision that can be delivered within the site, will result in missed opportunities to contribute sustainably towards growth up to 2050.



17. It is worth remembering that paragraph 73. a) requires Councils to consider the opportunities presented by existing or planned investment in infrastructure when deciding the location of new development. The SA should therefore take into account the planned facilities at Kings Hill SUE.
18. The HLM site 103 is well placed to achieve the 20 minute neighbourhood principle for all services listed in Figure 3.3, and is therefore a BL reasonable alternative which HLM would request be assessed as part of the next iteration of the SA.
19. Failure of the SA to appraise realistic growth options south of Coventry as a reasonable alternative could result in the Plan not demonstrating that its proposals are 'appropriate' and 'justified'.

Q-14.1 Infrastructure Safeguarding

20. Yes, HLM consider a policy should be included that safeguards specific infrastructure. This should include the Coventry South Rail Station and Public Transport Interchange, Track widening of the Leamington to Coventry Rail Line, Coventry's Very Light Rail Track Proposals, and the A46 Strategic Link Road as illustrated within the Vision Document. Any designation on the Proposals Map will need to identify a zone to allow flexibility at the detailed design stage.

Option S2-C: Intensification

21. Intensification is a way to optimise brownfield land and realise its effectiveness. However, HLM consider that this matter should be dealt with by the SWLP Part 2 Local Plan or Neighbourhood Plans if relevant, so that the implications of applying an intensification policy to a particular area can be assessed in terms of character and deliverability, which are key factors to consider.
22. Intensification is challenging and requires evidence around viability and deliverability before it can be considered to form part of the supply, and as such any intensification potential in the windfall allowance should be avoided.



Q-S3.1: Urban Capacity Study

23. The production of an Urban Capacity Study (UCS, October 2022) to support identification of brownfield land to help deliver the growth needs of South Warwickshire is in accordance with the NPPF¹. The following points are made in relation to how the UCS considers housing supply in the urban areas. However, it should be noted that the UCS also discusses the SWLP housing requirement and representations are made on those points under Q-H1-1 & 2.
24. In relation to housing allocations from the adopted Local Plans, HLM consider that a comprehensive review of all outstanding allocations without planning permission is required to ensure that such sites still meet the definition of developable as set out in the NPPF². In particular, evidence will be required to demonstrate why the UCS suggests the capacity of some of the allocations will increase beyond what is included within the adopted Local Plan. That review and evidence must be published prior to the next iteration of the Plan to demonstrate the capacity from the allocations can be relied upon to meet the housing need.
25. The UCS also includes within the supply 795 dwellings on sites which have been submitted to the SWLP Call for Sites process in the urban areas, and are considered to be potentially suitable. As no formal assessment of these submissions has taken place, their inclusion will need to be reviewed once the Housing and Economic Land Availability Assessment (HELAA) is published. Any allowance for such sites must be deducted from the windfall allowance.
26. The UCS identifies an additional five sites on vacant land in the urban areas which have not yet been submitted to the Call for Sites process, but are considered potentially suitable for 328 dwellings. There is no certainty around the availability and deliverability of these sites to include them at this stage. Further, on assessment of these sites there are some serious concerns around their suitability in any case. The UCS also identifies two additional sites on brownfield land within the urban areas, at Talisman Square, Kenilworth (65 dwellings) and Westgate House, Warwick (39

¹ Paragraph 119 of the National Planning Policy Framework (July 2021)

² Glossary of the National Planning Policy Framework (July 2021)



dwellings). As above, these sites have not yet been submitted to the Call for Sites process and so there is no certainty around delivery.

27. Finally, the UCS includes an assessment of the potential windfall supply with reference to the level of windfall delivery across South Warwickshire in the period 2011/12 to 2020/21. However, it is considered that this assessment is limited as it does not detail the sources of windfall supply, nor consider how the planning policy landscape in South Warwickshire may impact future windfall delivery. Whilst a windfall allowance is likely to be acceptable in principle in the SWLP, it should be calculated on the basis of compelling evidence as required by the NPPF³.

Q-S4.1: Growth of Existing Settlements

28. Yes, growth of existing settlements in South Warwickshire (and on the edge of South Warwickshire) is imperative to deliver the overall growth targets, and achieve the Vision and overarching principles. The need for housing, affordable and specialist housing, jobs, green infrastructure, improved facilities and infrastructure are all generated within the existing settlements. Those needs are best met sustainably adjacent to the settlements, rather than in new settlements.

Q-S4.2: Settlement Analysis

29. The following comments are made in respect of HLM's site reference 103, which is referenced as Area 7 and 8 within the South of Coventry Area.

30. In respect of Connectivity, it is noted the only barriers listed are the railway between Areas 7 and 8, and HS2 to the south. The Transport Authorities for the area have consulted on a new A46 Strategic Link Road within the HLM site that would provide a new crossing over the railway. Connectivity across the railway can be overcome and is envisaged by the Transport Authorities. HS2 to the south is not a barrier to connectivity to the South of Coventry, and therefore not considered relevant. Importantly, there are no barriers between the site 103 and the urban area of South Coventry.

³ Paragraph 71 of the National Planning Policy Framework (July 2021)



31. In respect of Landforms, no account is taken in the assessment of the planned services at Kings Hill SUE. Unless there is evidence this development which has planning permission is not to be delivered, then it should be taken into consideration when assessing sites otherwise opportunities will be missed to locate development near to planned infrastructure and facilities.
32. Paragraph 73. a) requires Councils to consider the opportunities presented by existing or planned investment in infrastructure when deciding the location of new development. The assessment should therefore be amended to take into account the planned facilities at Kings Hill SUE.
33. A comment is made in the Connectivity Section that the area would erode the separation between Coventry and Kenilworth at its narrowest point. This comment does not appear to be relevant to the Connectivity Assessment, and in any event is inaccurate as the narrowest point would not be eroded.
34. It is noted the Councils are to undertake a review of the Green Belt to assess whether there are areas which no longer meet all five of the Green Belt purposes and could be removed. HLM have submitted with these representations an assessment of its site against the five purposes of the Green Belt, and it is requested this is taken into account when the Councils undertake their assessment.
35. In summary, the extent to which site 103 contributes to the purposes of the Green Belt and preventing neighbouring towns merging is diminished by the construction of HS2, the planned construction of the A46 Strategic Link Road, and the planned woodland belt that will be planted along these two infrastructure corridors. These works will create a sizeable and strong defensible boundary between the settlements of Coventry and Kenilworth, and the narrowest part of the gap between the two will not be eroded as illustrated within the assessment provided by HLM.
36. It is important also that any assessment has regard to paragraph 142 of the NPPF, and the need to give first consideration to previously developed land and/or land well served by public transport, and also to take into consideration the ability to offset any removal through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. HLM's proposals as illustrated within the



Vision Document for site 104 show how compensatory improvements are proposed to the environmental quality of land north of Kenilworth in the form of flood mitigation and ecological enhancement works.

37. The Councils will be aware of the Transport Authorities plans to provide a new rail station/public transport interchange within the HLM site, that is to be connected by Very Light Rail to Coventry running through the site. When completed, this site will be one of the best served sites in South Warwickshire for public transport.

Q-S7.2: Refined Spatial Growth Options

38. HLM consider a mixture of options will be required to best deliver the growth needs of South Warwickshire for the reasons as set out below.

39. Firstly, the results of the high level testing of the five growth options in the supporting Sustainability Appraisal demonstrates that the options perform differently in different areas, with no one option standing out as the best performing option across all areas.

40. Secondly, it is important to remember that the assessment set out in the SA is provided at a high level, subject to several caveats, and without consideration of mitigation or deliverability. Options which score less favourably in the SA could therefore actually deliver more sustainable growth on closer examination.

41. Finally, given the significant level of growth the SWLP will need to accommodate (see response to Issues H1 and H4 below) this is unlikely to be able to be met sustainably through a single growth strategy.

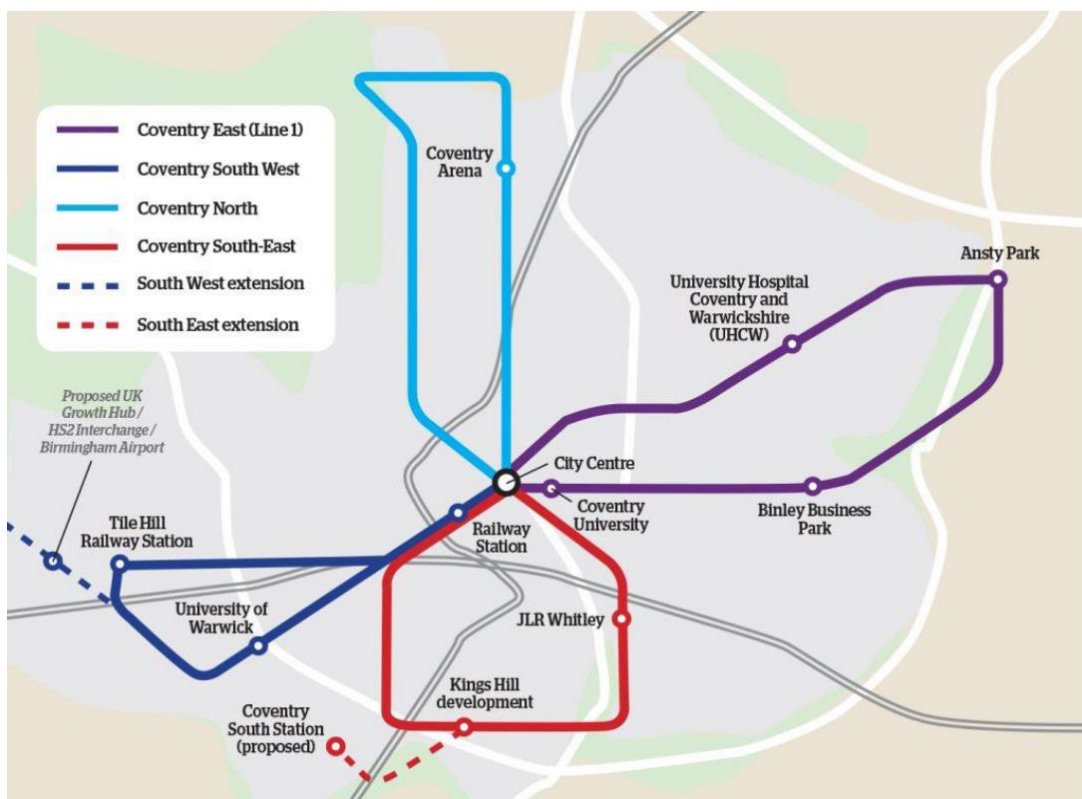
42. HLM also have the following comments on the Options.

43. HLM query why growth South of Coventry appears to be limited to the Kings Hill SUE for the Rail Corridors (1), Sustainable Travel (2) and Sustainable Travel and Economy (4) Options. The consultation document recognises that infrastructure thresholds for new railway stations are 6,000 homes (Table 3). As Kings Hill is only 4,000 homes, an additional 2,000 homes would be necessary to support the viability of a new station. The HLM site would make a logical extension to Kings Hill SUE, connecting this SUE with a new Coventry South Railway Station as proposed by the Transport Authorities,



and delivering around 1,300 additional homes that contributes to its viability and delivery. HLM therefore request these options (1, 2, and 4) are amended to include at least an additional 2,000 homes at South of Coventry.

44. HLM also make the following specific comment in relation to the Sustainable Travel Option (2). Reference is made to bus corridors, but no reference is made to Very Light Rail which Coventry City Council are proposing to develop into Warwick District within the Plan period at Kings Hill SUE and the HLM site (see below). It is noted in Issue T2 that people responded to the previous consultation by commenting that focus should be on encouraging the use of very light rail. The Sustainable Travel Option should have regard to the Very Light Rail proposals, and therefore include growth options along its route (namely the HLM site).



45. HLM also make the following specific comment in relation to the Economy Option (3) and Dispersed Option (5). These options include a significant urban extension south of Westwood Heath and Warwick University. It is acknowledged this is an indicative location for growth, however any major development in this location south of Westwood Heath could not be commenced until the A46 Strategic Link Road has been



completed, which goes through the HLM site. Given the proximity of the HLM site to the University and surrounding employment areas, and the planned active and sustainable travel infrastructure for this area, the best solution for the Economy and Dispersed Options would be to spread growth across the area South of Coventry to ensure the best use is made of planned infrastructure and connections to jobs.

Q-S10: Other Development Strategy Issues

46. More generally, HLM wish to make the point that the South Warwickshire Local Plan clearly must have regard to Coventry City and its proposals for the City. This is not just in terms of housing and jobs, but also transport, services, green infrastructure, etc. Having regard to the City's ambitions for its City Centre, homes, jobs, and infrastructure, the South Warwickshire Local Plan must play its part and therefore South Coventry must inevitably be a focus for growth within the Plan period to 2050 to support the regeneration and transformation of the City to a modern 21st Century City with an expanded World-Class University, Very Light Rail, City fibre, high quality residential areas, and an innovative economy.
47. Both Warwick and Coventry Councils shared a Vision for land south of Coventry in its adopted Local Plan (Appendix B). That Vision should be refreshed and updated to reflect what has happened since 2017, and to look forward to how this area might be in 2050 with sustainable and active travel infrastructure at its core, with attractive residential communities nestled within green and blue infrastructure.
48. HLM have set out a Vision for its site which shows how development could help achieve the five overarching principles of the Plan. This includes a commitment to designing the development to drive down emissions and be more climate responsive. This Vision can sit within and inform a wider Vision for the area, and HLM would be happy to meet to discuss this further with the Councils and Transport Authorities.

Chapter 5 - Delivering South Warwickshire's Economic Needs

Q-E7.1: Core Opportunity Areas

49. HLM support option E7.1a and directing employment growth to the Core Opportunity Area.



Chapter 6 - Delivering Homes that meet the needs of all our Communities

Q-H1-1 & 2: Providing the Right Number of New Homes

50. Yes, the HEDNA provides a reasonable basis for identifying future levels of housing need across South Warwickshire. However, HLM reserve its position in respect of whether this approach is reasonable for other authorities in Coventry and Warwickshire.
51. The NPPF sets out that “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”⁴. National policy is therefore supportive of the approach that South Warwickshire Councils are seeking to implement, and as such utilising the HEDNA to inform the local housing need for South Warwickshire is supported.
52. It is important, however, to remember that the local housing need is not the same as the housing requirement within the Plan.
53. As set out in the appended South Warwickshire Housing Need Evidence Base Review Technical Report commissioned by HLM, whilst HLM support the housing need figures for South Warwickshire set out in the HEDNA, HLM have some concerns with the approach taken in the HEDNA to economic growth and affordable housing need.
54. On economic growth, whilst HLM agree with the demographic modelling assumptions used to calculate economic-led housing need in the HEDNA, the job growth assumptions require updating for the following reasons:

⁴ Paragraph 61 of the National Planning Policy Framework (July 2021)



- The 2022 HEDNA's Cambridge Econometrics (CE) job forecast is outdated (March 2021) and was generated during strict Covid-19 measures in the UK;
- CE are a robust source of job forecasts but a more recent forecast should be used;
- Assumed GDP informing the HEDNA's job growth forecasts has now been shown to be an underestimate of growth by the Office for National Statistics;
- The higher GDP for 2021 and 2022 indicates job growth forecasts would be higher than those used by the HEDNA;
- Furthermore, job growth experienced in Warwick District and Stratford-on-Avon District during 2011 to 2019 significantly exceeded the CE forecast used to calculate economic-led housing need for the 2022-2043 period;
- It is unclear from the HEDNA whether economic growth on a number of sites within South Warwickshire are taken account of by the CE baseline projections. If not, these developments should be taken account of;
- The Council should consider job growth forecasts from Oxford Economics and Experian Economics alongside those from the CE.

55. HLM also consider that the significant level of unmet affordable housing needs across South Warwickshire should be taken into account in determining the housing requirement. The submitted analysis finds that the minimum housing need would be 1,609 dwellings per annum in Stratford-on-Avon District and 2,872 dwellings per annum to meet affordable housing needs based on past net delivery. Whilst it is recognised that this is significantly greater than the level of housing need set out in the HEDNA and is possibly unsustainable to deliver, this should influence the housing requirement through an appropriate uplift.

56. The enclosed analysis should be given consideration as the SWLP emerges, to ensure a sufficient level of housing is planned for across South Warwickshire.

57. The UCS suggests that the SWLP housing need equates to 30,750 dwellings, however this figure does not reflect the latest evidence within the HEDNA and needs updating. In addition, the UCS assumes a Plan period which commences in 2025, however this does not align with the base date of the HEDNA and as such a Plan period from 2022 is considered more appropriate to align with the evidence base.



58. On the basis of the above, we consider a more appropriate local housing need for the SWLP is 47,012 dwellings over a 28 year plan period.
59. In line with the NPPF⁵, it is considered that this figure represents the minimum number of homes needed, and that the Councils should consider whether it is appropriate to set a higher housing requirement in line with national guidance⁶; for example in order to address a significant affordable housing shortfall, support economic development, or address strategic infrastructure requirements which are likely to increase the number of homes needed.
60. Further consideration will also need to be given to unmet needs within the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness⁷, which is explored in further detail in response to Issue H4 below.
61. Bringing together comments on the UCS and Unmet Needs under Q-H4.2, HLM consider that the SWLP will need to plan for a level of housing growth as set out in the below Table in the order of at least 43,000 dwellings.

⁵ Paragraph 61 of the National Planning Policy Framework (July 2021)

⁶ Paragraph 010 Reference ID 2a-010-20201216 of National Guidance

⁷ Paragraph 35 a) of the National Planning Policy Framework (July 2021)



Table – SWLP Housing Requirement and Supply Calculation

<u>Housing Requirement</u>	
South Warwickshire Minimum Housing Need Derived from the HEDNA (1,679 x 28 Years)	47,012 dwellings
Uplift to Minimum Housing Need	TBC – further work required to determine whether an uplift is appropriate
Contribution Towards Unmet Needs of Coventry and Birmingham & Black Country	TBC – engagement with Birmingham/Black Country and Coventry required but suggest increase of at least 21,000 dwellings possible (circa 11,000 towards Coventry and at least 10,000 towards Birmingham)
Total Housing Requirement	68,000 dwellings +
<u>Housing Supply</u>	
Sites with Planning Permission at 1 st April 2022 (with 5% lapse rate applied)	14,360 dwellings
Outstanding Local Plan Allocations at 1 st April 2022	5,579 dwellings
Windfall Allowance	TBC – 4,840 dwellings assumed in line with UCS however this requires further justification / compelling evidence
Total Housing Supply	24,779 dwellings
Indicative Housing Requirement to be found by the Plan	43,000 dwellings +



Q-H4.2: Accommodating Housing Needs Arising from outside of South Warwickshire

62. It is imperative that that SWLP adequately considers accommodating unmet housing needs which are arising from outside of South Warwickshire, to ensure compliance with the Duty to Cooperate and so the SWLP can demonstrate adherence with the positively prepared test of soundness set out in the NPPF⁸. It is recognised that national planning policy and law has the potential to change during the course of the preparation of the SWLP, including in relation to the Duty to Cooperate and replacement with an ‘alignment policy’, however there is no suggestion the requirement for local authorities to address unmet needs arising from within their Housing Market Areas will be removed.
63. We consider that there are two likely sources of unmet housing needs which require consideration in the development of the SWLP: Birmingham and Black Country and Coventry and Warwickshire.

Birmingham and Black Country

64. There are clearly significant unmet housing needs arising from the Birmingham and Black Country Housing Market Area which require addressing by this Plan.
65. Birmingham published a New Local Plan Issues and Options consultation document in October 2022. This identifies an overall housing need in Birmingham to 2042 (derived from the Standard Method) of some 149,286 dwellings, with total housing supply equating to just 70,871 – leaving a shortfall of some 78,415 dwellings.
66. There are significant limitations to the potential for such substantial unmet needs to be met by Birmingham’s neighbouring authorities due to lack of available land in the Black Country and significant Green Belt coverage in the Black Country and elsewhere (Bromsgrove, Solihull, North Warwickshire, and Lichfield). This was evident in the work undertaken in the now abandoned Black Country Local Plan Review, which was subject to Regulation 18 consultation in 2021 and identified a shortfall in supply across the Black Country of some 28,239 dwellings to 2039.

⁸ Paragraph 35 a) of the National Planning Policy Framework (July 2021)



67. There are strong functional relationships between Birmingham and South Warwickshire, in terms of transport connections and commuting patterns, and development in South Warwickshire can contribute towards meeting unmet needs.
68. The Councils clearly need to engage with Birmingham and the Black Country authorities and others to determine an appropriate level of unmet needs to be directed to South Warwickshire. That process needs to be transparent in accordance with paragraph 27 of the NPPF, and effective in accordance with paragraph 35 c) of the NPPF. The lack of any published Statement of Common Ground showing progress made so far by the Councils is a concern that needs to be addressed before the next round of consultation. The Councils need to properly grapple with this issue, and not allow the failings of the last round of Local Plans to be repeated.
69. It is noted that the SA has tested the effects of an additional 5,000 to 10,000 dwellings to accommodate Birmingham's unmet needs, however given the numbers discussed above HLM consider 5,000 dwellings to be at the lower end of what could be expected to be accommodated in South Warwickshire. At this stage of the process and in advance of those discussions, as a working assumption for the level of unmet need to be accommodated, the figure should be an additional 10,000 dwellings.

Coventry and Warwickshire

70. Although the question does not address Coventry's unmet needs, this cannot be ignored. Coventry has by far the greatest level of housing need across Coventry and Warwickshire as set out in the HEDNA, with a housing need calculation derived from the Standard Method of some 3,188 dwellings per annum, adjusted in the HEDNA trend-based approach to 1,964 dwellings per annum. Applying the housing need calculated in the HEDNA to the proposed SWLP Plan period suggested from 2022 to 2050 equates to some 54,992 dwellings to be accommodated to meet Coventry's needs, as a minimum.
71. Coventry is highly constrained by a tightly drawn administrative boundary, with potential for brownfield redevelopment but limited opportunity for greenfield development. This was reflected in the adopted Coventry Local Plan (December 2017), where the local housing need in Coventry in the period 2011 to 2031 was



calculated at 42,400. The Coventry Local Plan set a housing requirement of just 24,600 (some 60% of its local housing need), leaving a shortfall of some 17,800 dwellings to be met elsewhere.

72. It is therefore highly unlikely that Coventry will be able to meet its local housing need identified in the HEDNA of 54,992 dwellings to 2050. Even assuming that Coventry can accommodate a proportion of its local housing need consistent with that set out in the adopted Coventry Local Plan (i.e. 60%), which is itself a challenge, Coventry could only accommodate 33,000 dwellings to 2050 leaving a shortfall of some 22,000 dwellings to be met elsewhere.

73. Given South Warwickshire's functional relationship with Coventry, and as South Warwickshire makes up around half of the population of Warwickshire according to the 2021 Census data early releases⁹, an assumption that around 50% of this shortfall will be directed to South Warwickshire is considered appropriate. This equates to approximately 11,000 dwellings and should be taken into consideration at this stage of the process as a working assumption for the level of unmet need to be accommodated.

Q-H4.3: Accommodating Housing Needs Arising from outside of South Warwickshire

74. With regard to how and where best housing shortfalls should be accommodated in South Warwickshire, HLM consider that settlements or areas with the strongest sustainable transport connections to the conurbations where unmet housing needs are arising should be prioritised. In the case of Coventry's unmet needs, this should be land south of Coventry.

Q-B.1: Areas of Restraint

75. In the context of planning for major urban extensions, the Councils may wish to consider whether the areas it considers should remain open should be designated as Green Belt in accordance with paragraph 139 of the Framework.

⁹ [How the population changed where you live, Census 2021 - ONS](#)