

3 Planning Policy Context

3.1 Introduction

3.1.1 The purpose of this chapter is to establish the planning policy framework applicable to the Proposed Development as described in Chapter 2. This policy chapter should be read in conjunction with Chapters 4 to 13 of the ES which address the policies that relate specifically to each of the disciplines.

3.2 National Planning Policy Framework

3.2.1 The National Planning Policy Framework (NPPF) was published on 27th March 2012. The Ministerial foreword is clear that development which is sustainable should go ahead, without delay.

3.2.1 The Framework applies to both plan making and development management. It makes it clear that the economic, social and environmental components of sustainable development should be pursued **“jointly and simultaneously through the planning system”** (Paragraph 8).

3.2.2 The NPPF comprises of three main sections – Achieving Sustainable Development, Plan-Making and Decision-Taking. As the Environmental Statement (ES) is submitted as part of a planning application a detailed consideration of Plan-Making within the Framework has not been undertaken.

Achieving Sustainable Development

3.2.3 At the heart of the Framework is a presumption in favour of sustainable development and, as paragraph 14 notes, this should be seen as a golden thread running through both plan making and decision taking. In respect of the latter paragraph 14 continues:

“ For decision-taking this means [unless material considerations indicate otherwise]:

approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or**
- **specific policies in this Framework indicate development should be restricted** [such as SSSI or AONB].”

3.2.4 The Framework contains a set of core land use principles which should underpin both development management and plan making. These principles are that planning should:

- be genuinely plan-led with plans being kept up-to-date and based on joint working and co-operation to address larger than local issues. Plans should provide a practical framework within which applications can be decided;
- not simply be about scrutiny but be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet housing, business and other development needs, taking account of market signals and setting a clear strategy for allocating sufficient land;
- always seek to secure high quality design and a good standard of amenity;
- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the green belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- support the transition to a low carbon future, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, and encourage the use of renewable resources;
- contribute to conserving and enhancing the natural environment and reducing pollution;
- encourage the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value;

- promote mixed-use developments, and encourage multiple benefits from the use of land in urban and rural areas;
- conserve heritage assets in a manner appropriate to their significance;
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and,
- take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

3.2.5 In addition to the presumption in favour of sustainable development and core planning principles, the 'Achieving Sustainable Development' section also addresses the delivery of sustainable development and covers various subject matters including promoting sustainable transport, delivering a wide choice of high quality homes, requiring good design, promoting healthy communities, climate change and flood risk, and conserving and enhancing both the natural and historic environments.

Delivering Sustainable Development

3.2.6 The Framework outlines the Government's objectives for securing sustainable growth.

3.2.7 Paragraphs 24 to 27 consider the sequential test for main town centre uses that are outside existing centres and not in accordance with an up-to-date local plan and impact tests for retail, leisure and office uses outside town centres and not in accordance with an up-to-date local plan. This is of some relevance in connection with the local centre proposed in the development.

3.2.8 Regarding sustainable transport, Paragraph 29 notes that transport policies have an important role to play in facilitating sustainable development. Balanced in favour of sustainable transport modes, the transport system should give people a real choice about how they travel. Encouragement should be given to reducing both greenhouse gas emissions and congestion.

3.2.9 Decisions should take account of whether (i) the opportunities for sustainable transport have been taken up to reduce the need for major transport infrastructure; (ii) safe and suitable access to the site can be achieved for all people; and, (iii) improvements can be undertaken within the transport network that cost effectively limit the significant impacts of development. Proposals should only be refused on transport grounds where the residual cumulative impacts of development are severe.

3.2.10 Paragraph 34 states that development which generates significant movements should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

3.2.11 Transportation matters are covered in Chapter 11 and the relevant Appendices of this ES.

3.2.12 In respect of housing development, Paragraph 47 is clear that to boost significantly the supply of housing, local planning authorities should "**use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area**" (being consistent with the policies in the Framework); identify "**sites sufficient to provide five years worth of housing against their housing requirements**" with an additional 5% buffer moved forward from later in the plan period or, for those local planning authorities that have a record of persistent under delivery of housing, a 20% buffer; "**identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15**"; "**illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing**"; and "**set out their own approach to housing density**".

3.2.13 Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. It continues stating that housing supply policies should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.

3.2.14 Paragraph 52 notes that the supply of new housing can sometimes be best achieved through planning larger scale development, including extensions to existing towns that follow the principles of Garden Cities.

- 3.2.15 In terms of design, paragraph 56 is clear that good design is a key aspect of sustainable development. Paragraph 57 continues that it is important to plan positively for the achievement of high quality and inclusive design. Planning decisions should aim to ensure that developments:
- will function well and add to the overall quality of the area;
 - establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
 - respond to local character and history, and reflect the identity of local surroundings and materials;
 - create safe and accessible environments; and,
 - are visually attractive as a result of good architecture and appropriate landscaping.
- 3.2.16 Paragraph 60 notes that policies and decisions should not attempt to impose architectural styles or particular tastes. Policies and decisions should address connections between people and places and the integration of new development into the natural, built and historic environment.
- 3.2.17 In determining applications, paragraph 63 states that great weight should be given to outstanding or innovative designs which help raise design standards more generally in an area. Paragraph 64 is clear that permission should be refused for development of poor design that fails to take available opportunities to improve character and quality of an area and the way it functions. Paragraph 66 notes that applicants will be expected to work closely with those directly affected by development and proposals that can demonstrate this in developing the design should be looked on more favourably.
- 3.2.18 The Design and Access Statement submitted with the application further explains the design philosophy of the proposals.
- 3.2.19 On the issue of healthy communities, Paragraph 69 notes that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. As part of decision making the provision and use of shared space, community facilities and other local services should be planned positively to enhance the sustainability of communities and residential environments (Paragraph 70).
- 3.2.20 In terms of education, the Government attaches great importance to ensuring that sufficient choices of school places are available (Paragraph 72). Paragraph 73 says that access to high quality open space and opportunities for sport and recreation can make an important contribution to health and well-being.
- 3.2.21 Paragraphs 79 – 92 relate to Green Belts. These confirm that the Government attaches great importance to Green Belts and that their fundamental aim is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence.
- 3.2.22 Green Belts serve five purposes:
- To check the unrestricted sprawl of large built up areas
 - To prevent neighbouring towns merging into one another
 - To assist in safeguarding the countryside from encroachment
 - To preserve the setting and special character of historic towns
 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land
- 3.2.23 When considering any planning applications local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. The Planning Statement undertakes this particular exercise.
- 3.2.24 The Framework addresses climate change and flooding. Paragraph 93 notes that planning plays a key role in reducing greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy.

- 3.2.25 When determining applications local planning authorities should expect new development to comply with adopted local plan policies on local requirements for decentralised energy supply (unless it can be demonstrated this is not feasible or viable) and take account of landform, layout, building orientation, massing and landscaping to minimise energy generation. Renewable energy is considered in more detail in the Sustainability Statement accompanying the planning application.
- 3.2.26 Depending on location and size of site, the Framework requires a site-specific flood risk assessment. Flood risk assessments (and the sequential and exception tests, and managing residual flood risk) are considered in more detail in the technical guidance published alongside the NPPF. Drainage and Flood Risk is addressed in Chapter 10.
- 3.2.27 Regarding the natural environment, the Framework considers that the planning system should contribute to and enhance the natural and local environment (Paragraph 109). Policies and decision making should encourage the effective use of land by using that which has previously been developed and local planning authorities should take account of the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary then local planning authorities should seek to use areas of poorer quality. This issue is addressed in Chapter 8.
- 3.2.28 Paragraph 118 notes that when applications are being determined local planning authorities should aim to conserve and enhance biodiversity by, amongst other things, encouraging the incorporation of biodiversity in and around developments and refusing permission which would result in the loss or deterioration of irreplaceable habitats (e.g. ancient woodland or aged or veteran trees outside ancient woodland), unless the needs and benefits of the development outweigh the loss.
- 3.2.29 Ecological issues are considered in Chapter 5.
- 3.2.30 Planning policies and decisions should ensure new development is appropriate to its location so as to prevent unacceptable risks from pollution and land instability (Paragraph 120). Land contamination and geotechnical issues are addressed in Chapter 9.
- 3.2.31 In terms of noise, Paragraph 123 states that policies and decisions on new development should aim to avoid significant adverse noise impacts on health and quality of life; mitigate and reduce to a minimum other adverse noise impacts on health and quality of life through conditions; recognise that development e.g. existing businesses, will often create some noise; and identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. Noise considerations are set out in Chapter 13.
- 3.2.32 Regarding air quality, the Framework makes reference to planning policies sustaining compliance with and contributing towards EU limit values or national objectives, taking into account Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Air Quality issues are addressed in Chapter 12.
- 3.2.33 Finally in respect of the natural environment, the Framework, by encouraging good design, notes that policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 3.2.34 Concerning the historic environment, Paragraph 128 says that in determining applications local planning authorities should require an applicant to describe the significance of any heritage assets affected with the level of required detail being proportionate to the importance of the assets. The paragraph continues that where a development site includes, or has the potential to include, heritage assets with archaeological interest a desk-based assessment and, where necessary, a field evaluation is required. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal and take this into account when considering the impact upon it.
- 3.2.35 Further policy on determining applications is provided in Paragraph 131, including taking account of the positive contribution the conservation of heritage assets can make to sustainable communities and the desirability of new development to make a positive contribution to local character and distinctiveness.
- 3.2.36 The Framework also considers the impact of proposed development on the significance of designated heritage assets and the level of harm. Significance can be harmed or lost through alteration or destruction of an asset or development within its setting. As Paragraph 132 notes,

heritage assets are irreplaceable and therefore any harm or loss requires clear and convincing justification. Where proposed development will lead to a substantial harm to or total loss of significance of a designated heritage asset then consent should be refused unless the harm or loss achieves substantial public benefits that outweigh that harm or loss. The effect on significance of a non-designated asset should also be taken into account and a balanced judgement made.

- 3.2.37 Issues concerning the historic environment are addressed in Chapter 6 Archaeology and Cultural Heritage.

Decision-Taking

- 3.2.38 Paragraph 186 is clear that local planning authorities ***“should approach decision-making in a positive way to foster the delivery of sustainable development”***. Paragraph 187 continues that local planning authorities ***“should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions for the area”***.
- 3.2.39 The Framework discusses pre-application engagement and front loading in respect of public bodies such as local planning authorities and the local community. As well as applicants taking an early proactive approach the Framework suggests that statutory consultees should also do the same.
- 3.2.40 In determining planning applications, Paragraph 196 states that the NPPF is a material consideration. Paragraph 197 reiterates that in assessing and determining proposals ***“local planning authorities should apply the presumption in favour of sustainable development”***.

National Planning Practice Guidance (PPG)

- 3.2.41 The PPG sets out that the aim of Environmental Impact Assessment is to protect the environment by ensuring that a local planning authority, when deciding whether to grant planning permission for a project which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects and takes this into account in the decision-making process. The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 set out a procedure for identifying those projects which should be subject to EIA and for assessing, consulting and coming to a decision on those projects which are likely to have significant environmental effects.
- 3.2.42 The PPG identifies five broad stages to the EIA process. This consists of screening, scoping, preparing an environmental statement, making a planning application and consultation and decision making. In this case the applicants have received screening and scoping opinions from the local planning authority. The Environmental Statement has been prepared in accordance with relevant guidance. The statement will form part of the planning application submitted to Coventry City Council and will be subject to consultation.
- 3.2.43 The PPG states there is no statutory provision as to the form of an Environmental Statement. However it must contain the information specified in Part 2 of Schedule 4 and such of the relevant information in Part 1 of Schedule 4 as is reasonably required to assess the effects of a project which the applicant can reasonably be required to compile. It may consist of one or more documents but it must constitute a single and accessible compilation of the relevant environmental information and the summary must be in a non-technical language. Whilst every environmental statement should provide a full factual description of the development, the emphasis of Schedule 4 is on the “main” or “significant” environmental effects to which a development is likely to give rise. The ES should be proportionate and should not be longer than is necessary to assess properly those effects. Where, for example, only one environmental factor is likely to be significantly affected, the assessment should focus on that issue only. Impacts which have little or no significance for the particular development in question will need only brief treatment to indicate where possible their relevance has been considered. The aspects of the environment that may be significantly affected by a project is set out in Schedule 4. This can include population, fauna, flora, soil, water, air, archaeological heritage, landscape and the relationship between factors.
- 3.2.44 The PPG makes clear that an applicant does not need to consider alternatives, however where alternatives have been considered Paragraph 4 of Part 2 Schedule 4 requires the applicant to

include in the Environmental Statement an outline of the main alternatives considered and the main reasons for their choice.

- 3.2.45 When submitting an Environmental Statement the applicant should submit one additional copy of the Environmental Statement for onward transmission by the Local Planning Authority to the Secretary of State, a note of the name of everyone to whom the applicant has already been sent and sufficient further copies of the Environmental Statement as are needed to allow the Local Planning Authority to send one to the other consultation bodies.

3.3 The Development Plan

- 3.3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of the Proposed Development constitutes:

- Saved policies of the Coventry Development Plan 2001

Coventry Development Plan 2001 – Saved Policies

- 3.3.2 Policy OS1 states the objectives of Economic Regeneration, Social Equity and Environmental Quality in Coventry will be promoted in order to create a regenerated, sustainable and high quality city. These will be achieved by the Coventry Development Plan through the promotion and encouragement of desirable change and the control of development.

- 3.3.3 Policy OS4 states that developing concepts and techniques of sustainability will be applied through policies in the Plan to:

- ensure the efficient use and re-use of land and buildings
- encourage rational modes and patterns of travel; and
- promote the good stewardship of the nature and built environment

- 3.3.4 Policy OS4 goes on to state Sustainability Assessments will be required in respect of large scale or high impact development proposals in order to establish the best practical mix of land uses and design of developments and relationship to the built and natural environment.

- 3.3.5 Policy OS5 aims to achieve a high quality city. Measures to achieve this include the design and protection of urban and rural green spaces, design in the built environment generally, creation of high quality urban public spaces, diversity and vitality through compatible mixture of land uses, equality of opportunity for all and access for disabled people.

- 3.3.6 Policy EM2 states where likely damage to air quality cannot be satisfactorily mitigated development will not be permitted.

- 3.3.7 Policy EM3 indicates proposals which appear capable of :

- Reducing the quantity of water in watercourses and ponds to the extent it is harmful to the ecology;
- Damaging the quality and ecology of the water environment;
- Compromising the achievement of water quality objectives; or
- Causing damage too or preventing use of ground water resources

- 3.3.8 Will be permitted only if it is certain that such risk will be kept to an acceptable level.

- 3.3.9 Policy EM4 deals with flood risk and development and states development should be designed and located to minimise the risk of flooding and maximise the absorption of surface water run-off by the ground.

- 3.3.10 Policy EM5 states proposals which could result in the pollution of water, air or ground or pollutions through noise, dust, vibration, smell, light, heat or radiation will only be permitted if the health and safety and amenity of the users of the land and neighbouring land and the quality and enjoyment of the environment are assured. Proposals for uses which are sensitive to pollution will not be permitted close to existing or proposed potentially polluting uses.

- 3.3.11 Policy EM6 states development on or adjacent to contaminated land will be permitted only if any measures for remediation or protection required to ensure the health and safety of development and its users are identified and implemented.
- 3.3.12 Policy EM8 states development proposals which incorporate external lighting will be considered having regard to the nuisance to road users, harm to amenity residents, detriment to the rural character or local distinctiveness of an area and compatibility with other plan policies.
- 3.3.13 Policy EM9 identifies a waste strategy. This states the following hierarchy of waste handling methods will be promoted and encouraged:
- Waste reduction;
 - Reuse
 - Recovery; and
 - Safe disposal;
- 3.3.14 Policy EM10 states facilities for the reuse and recycling of waste materials will be promoted and encouraged provided that they are:
- Located so as to be accessible for people by a choice of means of transport;
 - Designed to a high standard within the context of the local setting; and
 - Compatible with nearby uses.
- 3.3.15 Policy H1 states all existing and future citizens should have access to a range of housing that is of satisfactory size and condition and within a high quality residential environment.
- 3.3.16 Policy S1 indicates the Council will protect, maintain and enhance the hierarchy of centres shown on the Proposals Map in order to provide access to a wide range of quality shops, services and other activities for all sections of the community. Further proposals for new shopping developments should be located within a defined centre of appropriate scale and function. Elsewhere the approach set out in Policy S11 will be applied. Proposals for new and existing local shops will be determined under Policy S9.
- 3.3.17 Policy S9 states that proposals for new local shops will be permitted provided that they will not have a significant harmful impact on a defined centre, the retail outlets could not be provided equally well in vacant shops within a defined centre and the proposal is compatible with nearby uses.
- 3.3.18 Policy AM1 states the safe, efficient and easy movement of people and goods throughout the city will be promoted and encouraged through an integrated and accessible network. This will be achieved through planning developments in accessible locations, developing and coordinating transport facilities, promoting alternatives to the use of the private car and assessing the effects of proposals on the safety, convenience and environmental quality of transport users and local communities.
- 3.3.19 Policy AM2 states that development and coordination of the transport system will be promoted and encouraged to meet the needs of people without access to private transport, reduce car usage and enhance the environment.
- 3.3.20 Policy AM3 states major new development must facilitate the provision of safe, convenient and efficient bus services. To achieve this developers will be expected to include or fund physical works and in most cases contribute to enhanced bus services.
- 3.3.21 Policy AM8 indicates a network of convenient pedestrian routes, made safer by design will be promoted and encouraged. Priority will be given to routes to defined centres and local shops, schools, transport interchanges, local community, leisure and indoor sports facilities and green space areas.
- 3.3.22 Policy AM10 states developers will be expected to incorporate or fund traffic calming measures if traffic movement associated with the development would otherwise have a harmful effect on road safety or on environmental quality.
- 3.3.23 Policy AM12 states convenient cycle routes must be incorporated in the design of new developments and highway schemes.

- 3.3.24 Policy AM14 states the Council will promote and encourage new roads and road improvements where they will assist economic regeneration, improve safety, enhance transport efficiency and satisfactorily address environmental impacts.
- 3.3.25 Policy BE1 indicates that the City Council will promote and encourage improvement to the built environment throughout Coventry by setting out and applying:
- Policies and proposals for the environmental enhancement of corridors and gateways;
 - Policies for historic buildings and archaeology;
 - Policies for a specific design topics.
- 3.3.26 Policy BE2 sets out the principles of urban design. These include enhancing townscape and landscape character, strengthening the continuity of street frontages, providing high quality public spaces, promoting diversity through mixed uses and ensuring developments are sustainable.
- 3.3.27 Policy BE15 deals with archaeology. It states there will be a presumption in favour of the preservation of archaeological remains of national importance and of their settings. Development adversely affecting known or suspected archaeological remains of less than national importance will be permitted only if the benefits of development clearly outweigh the likely harm.
- 3.3.28 Policy BE20 deals with landscape design and development. It states a high standard of landscape design and boundary treatment will be required as part of the design of development.
- 3.3.29 Policy GE1 sets out the green environment strategy. This states that the Council will protect Green Space, make Green Space accessible to all sections of the community, give protection to valuable wildlife habitats and landscape features and maintain a green belt protecting the green wedges and the 'Arden' countryside from inappropriate development.
- 3.3.30 Table GE(1) sets out the Coventry Green Space Standards.
- 3.3.31 Policy GE3 states a network of Green Space corridors will be protected, promoted and encouraged across the City. They include green wedges, wetlands and river corridors.
- 3.3.32 Policy GE6 deals with the control of development in the green belt. It states inappropriate development will not be allowed in the green belt unless justified by very special circumstances. Development within or conspicuous from the green belt must not harm the visual amenities of the green belt by reason of siting, materials or design.
- 3.3.33 Policy GE9 deals with Green Space provision in new housing developments. It indicates that developers must ensure that sufficient good quality Green Space in new housing developments.
- 3.3.34 Policy GE14 states important landscape features of value to the amenity or history of the locality will be protected against unnecessary loss or damage.
- 3.3.35 Policy GE15 indicates that new development should preserve and enhance elements of nature conservation importance and add new habitats.

The Core Strategy 2009 and 2012

- 3.3.36 The Core Strategy 2009 had reached an advanced stage towards adoption. In particular the Core Strategy 2009 had been through Examination. The Inspector undertaking the Examination concluded that the Plan was sound and could move forward to adoption. The Core Strategy proposed Keresley to be identified as a reserved housing site and eco-suburb to deliver 3,000 dwellings. Reserved sites were to be released when there were insufficient sites within the urban area to meet the five year land supply.
- 3.3.37 The Inspector in considering the submission agreed with the Council that the Keresley site was clearly preferable in sustainability terms. In particular the Inspector noted that in principle Keresley is the most suitable and appropriate site and location for a sustainable extension and new community and that therefore the Core Strategy was sound in respect of this choice.
- 3.3.38 Following a change in political administration at the City Council and prior to the adoption of the Core Strategy 2009 the City Council concluded it did not wish to pursue the Plan further. The City

Council formally resolved to withdraw the 2009 Core Strategy at its meeting of the 23rd October 2012.

3.3.39 The Council embarked on producing a new Core Strategy 2012 which ultimately resulted in a Submission Plan being Examined in 2012. The Inspector considering the Core Strategy came to the view that a Preliminary Hearing Session was held on the 1st February 2013. This was to consider whether the City Council had discharged its duty to cooperate under Section 33A of the Planning and Compulsory Purchase Act 2004.

3.3.40 By letter dated 27th February 2013 the Inspector concluded that the Council had failed in its duty to cooperate. Consequently the Inspector recommend non adoption of the Plan for these reasons.

3.3.41 In view of the above the Council chose to withdraw the 2012 Core Strategy Submission from the Examination. It is notable that the 2012 Core Strategy made provision for 11373 dwellings in comparison to the 2008 Strategy which made provision for 33500 dwellings.

Joint Strategic Housing Market Assessment

3.3.42 Coventry City Council along with Rugby Borough Council, Warwick District Council, North Warwickshire Borough Council and Nuneaton & Bedworth Borough Council have jointly commissioned the preparation of a Joint Strategic Housing Market Assessment (SHMA) for their functional housing market area. The primary purpose of the SHMA is to guide, inform and support development of planning and housing policies. It provides the evidence base for the development of Local Plans and Core Strategies. The SHMA is concerned principally with the following issues:

- How many homes may need to be developed in the future
- What mix of homes might be needed
- The housing needs of specific groups within the population

3.3.43 The conclusions relative to individual authorities of the SHMA is that Coventry has seen strong recent population growth in contrast with longer term trends. Migration levels have varied significantly over time which has made population growth more difficult to accurately project.

3.3.44 The SHMA estimates that the overall need for housing in Coventry 2011 – 2031 was a minimum provision of 1040 dwellings per annum and an actual assessed need of 1180 dwellings per annum.

3.3.45 The next step is for the local authorities to test the ability to meet the levels of need for housing identified in their area taking account of a range of wider factors including:

- The availability of suitable land for development
- Strategic development constraints, and;
- The ability of infrastructure to support development

3.3.46 The SHMA does not set housing targets. However it does provide a consistent assessment of housing need which is the appropriate starting point for considering levels of housing provision. The actual overall assessed need for Coventry set out in the SHMA would be 23,600. To provide an actual housing requirement other factors would need to be inputted such as a vacancy rate and second homes.

3.4 Conclusion

3.4.1 This Chapter of the ES serves to provide the planning policy framework for the subsequent chapters that will address individual topic areas.

