

Examination of Coventry Local Plan

Inspectors: Simon Dean MA MRTPI and William Fieldhouse BA (Hons) MA MRTPI

Programme Officer: Helen Wilson

Tel: 07879 443035, 01432 639547

Email: helen@programmeofficers.co.uk

Examination website: [Coventry Local Plan Review | Helen Wilson Consultancy Limited](#)

IN12 Action points from week three hearing sessions

Introduction

Further to the discussions at the week three hearing sessions, the following actions are required in order to inform our examination of the Plan.

The Council should send its written responses to the Programme Officer by **midday on Wednesday 6 May 2026**.

We will then consider those responses, along with all of the evidence before us and discussions at the hearing sessions between 24 March and 28 April, and publish further action points in the week commencing 11 May which the Council will be asked to respond to in the week commencing 25 May.

We expect to hold a further hearing session or sessions on Tuesday 9 and/or Wednesday 10 June 2026.

Policy DS4 Part C Keresley SUE Specific Masterplan Principles

AP30 Council to amend the main modification to part i) to remove the words “incorporate the recommendations of” and then alter the wording to read “i) the Council’s Urban Extension Design Guide SPD (2019) and specifically Appendix 1 the Indicative Keresley Masterplan.”

Policy DS4 Part D Eastern Green SUE Specific Masterplan Principles

AP31 Council to prepare a main modification to part i) to remove the words “incorporate the recommendations of” and then alter the wording to read “i) the Council’s Urban Extension Design Guide SPD (2019)”; and add the new part xi) proposed in response to AP26¹.

¹ PS22 in response to IN10

Policy GB2 Safeguarded Land in the Green Belt

AP32 Council to prepare potential main modifications to the relevant parts of the reasoned justification to clarify that the safeguarded sites are still designated as Green Belt, possibly through the deletion of paragraph 9.7.

Policy GB3 Local Green Space

Policy GB3 seeks to ensure that development proposals on Local Green Space are assessed in relation to national planning policy on Green Belt, as set out in NPPF 107. As currently drafted, the policy is somewhat unclear in this regard.

AP33 Council to prepare potential main modifications to policy GB3 part 2 to delete “including those involving previously developed land and buildings” and adding “on Local Green Space” to the end of that sentence.

Policy GE2 Green Space

Paragraphs 9.15 and 9.16 of the reasoned justification set out the evidence which underpins the assessment of green spaces within the green and blue environment. The Council states² that the value of green spaces in Part 1 of Policy GE2 is also derived from that same evidence, including the defined open space typologies in the adopted Open Space SPD. However, the layout of the policies and reasoned justification currently makes it somewhat unclear that this evidence, in addition to any site-specific assessments also informs Policy GE2.

AP34 Council to prepare a potential main modification to the reasoned justification to Policy GE2 to clarify its relationship to the evidence base referred to elsewhere in the same chapter.

Policy GE3 Biodiversity, Geological and Landscape Conservation

Since the submission of the Plan for examination, the government has committed to amending the Environment Act to clarify the approach to the detail of the delivery of biodiversity net gain. As such, the wording of Policy GE3 requires amending to ensure consistency and to ensure that the policy is clearly written and unambiguous.

AP35 Council to prepare potential main modifications to ensure that Part 1.a of the Policy is clear on the split between those elements which relate to statutory Biodiversity Net Gain and those which do not; and a potential main modification to clarify the hierarchy of, and relationship between on- or off-site delivery of Biodiversity Net Gain.

² M9/1

Policy DE1 Ensuring High Quality Design

The current schedule of potential main modifications includes a proposed modification to paragraph 10.6 of the reasoned justification to Policy DE1. At present that modification refers to housing developments and Secured by Design Principles.

AP36 Council to prepare a potential main modification to remove the reference to housing development in paragraph 10.6, making clear that the safety requirements in Policy DE1 relate to all development; and to add reference to Park Mark standards.

Policy HE2 Conservation and Heritage Assets

The current schedule of potential main modifications includes a proposed modification to Policy HE2 Part 4 to ensure consistency with national policy.

AP37 Council to amend the proposed main modification to better reflect the wording of national planning policy, to read: “The sympathetic and creative re-use of heritage assets will be encouraged, in accordance with national policy, especially for heritage that is considered to be at risk...” (or similar).

Policy HE3 Heritage Park Charterhouse

The Council has previously prepared a modification to the policies map³ which shows the Heritage Park and Route on the policies map rather than in an appendix.

AP38 Please can the Council clarify what the colours and lines used on PMC1 are intended to represent; in particular the red line and the green ellipses. If the red line is intended to represent the heritage route referred to in the original Appendix 5, consider whether an alternative colour may be more effective.

Policy AC3 Demand Management

Mobility Credits are a developer funded scheme for access to sustainable or active travel. Generally this scheme is administered by the Council, but on occasion, developers take on its administration.

AP39 Council to prepare a main modification to the wording of Part 5 to make this clear; “...through the provision or funding of Mobility Credits...” (or similar).

Policy AC5 Bus, Demand Response Transit and Rapid Transit

Part 5 of the policy states that further details will be set out in the Coventry Connected SPD.

AP40 Council to clarify if this is an existing, adopted, or proposed SPD, noting our SQ1.6 from 13 February regarding new Supplementary Planning Documents.

³ PMC1 in PM2.1

Policy EM6 Redevelopment of Previously Developed Land

The reasoned justification and policy share the Previously Developed Land title, but then refer in detail to, and set policy requirements around, water quality, treatment, impacts and efficiency.

AP41 Council to consider whether or not the section and policy should be renamed for clarity.

Policy EM12 Reducing operational carbon in new build non-residential development

AP42 Council to prepare a main modification to Part 1.a of the policy to include PBSA within the 'hotels and residential institutions' line; and to add " , where feasible and viable" (or similar) after 'other non-residential buildings'.

Policy H6 Affordable housing

AP43 Council to amend the potential modification to policy H6 part 3 proposed in response to AP14 to clarify what applicants are expected to provide with regard to securing grant funding towards the provision of affordable housing in the central areas of the city defined on the policies map.

AP44 Council to amend the potential modification to paragraph 6.31 proposed in response to AP14 to read as follows (or similar):
"The Coventry Local Plan Viability Report October 2024 indicates that the provision of affordable housing in the central parts of the city (as defined on the policies map) is likely to be challenging without public subsidy. Planning applications for residential development in those areas should therefore be supported by evidence ..." Add additional text to complete the justification for the potential modification to policy H6 part 3 proposed in response to AP43 above.

Policy R3 Town Centre Network

The NPPF Glossary states that references to town centres or centres apply to city centres, town centres, district centres and local centres ... Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Policy R3 in the submitted Plan includes three retail parks as "major district centres". As such, neither national policy nor policy R4 in the Plan relating to sequential tests and impact assessments, would seem to apply to development proposals in those retail parks (because they seem to be identified as "town centres" in the Plan as referred to in the NPPF Glossary).

It is not clear, therefore, what mechanisms the Plan includes to ensure that proposals for further retail, leisure and other main town centre uses or additional floorspace at those three centres would not have a significant adverse impact on the city centre or other town centres in the network.

AP45 Council to amend the potential modification to policy R3 proposed in response to AP27 to clarify the approach to development at the three retail parks / major district centres.

AP46 Council to update the schedules of main modifications and changes to the policies map⁴ to include all of those proposed in response to the week 2 action points⁵ and the action points set out in this note.

Simon Dean William Fieldhouse

30 May 2026

⁴ PM3 and PM2.1

⁵ PS22