Planning Inspectorate

Examination of Coventry Local Plan

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IN13 Further action points following the week 1, 2 and 3 hearing sessions

Introduction

We published action points following the end of each week of the programmed hearing sessions held between 24 March and 28 April 2026. In doing so, we said we may decide in due course that other or different actions are required. We have decided that is the case, and they are set out below. These action points are necessary at this stage of the examination to further inform our consideration of whether the Plan is sound and, if not, how it could potentially be modified to ensure that it is. Our final conclusions will be informed by our further considerations during the examination, including further hearing sessions and consideration of representations that we receive in response to the main modifications that we subsequently decide to publish for public consultation[1].

The Council should send its written responses to the Programme Officer by **midday on Friday 29 May 2026**.

We will discuss those responses in a further hearing session or sessions to be held on **9 June** and/or **10 June 2026.**

Policy DS1 Overall development needs

To be consistent with national policy and effective, policy DS1 needs to be modified to:

- Clearly set out the minimum requirements for different types of development from the most recent relevant date prior to submission (based on available evidence).
- Look ahead 15 years following adoption in the case of the requirements for housing and employment development.
- Look ahead 10 years in the case of the requirements for retail development.
- Delete parts 3 and 4 (see AP49 below).

[1] **Procedure Guide for Local Plan Examinations** section 6.

AP47 Council to prepare a potential modification to policy DS1 to read as follows (or similar):
"The following minimum amounts of development are required to meet the city's identified needs:

- 26,046 net additional homes between 2024 and 2042.
- 18 additional pitches for Gypsy and Traveller accommodation between 2022 and 2042.
- 96 hectares of land for industrial and storage / distribution development between 2024 and 2042.
- 43,046 sqm of additional office floorspace between 2024 and 2042.
- 3,844 sqm (net sales area) of additional convenience retail floorspace between 2024 and 2034.
- 8,155 sqm (net sales area) of additional comparison retail floorspace between 2024 and 2034."

AP48 Council to prepare potential modifications to the relevant parts of the reasoned justification to summarise the evidence for the above figures, and how the amounts of development that the Plan identifies land to accommodate relate to those minimum requirements. In so doing, the Plan should clarify the extent of the shortfall against the need for local employment land (to replace the second sentence of paragraph 3.14 in the submitted Plan).

Policy DS1 parts 3 and 4 and policy DS2

Policy DS1 part 3 and policy DS2 both refer to the Council working with neighbouring local planning authorities in relation to a number of specific matters. However, the policies do not make it clear how a decision maker should react to development proposals in the city. Furthermore, parts of the policies do no more than summarise what is required by national policy and legislation; there are references to the duty to cooperate and preparing supplementary planning documents that are no longer relevant; and they seem to pre-determine the strategic, cross boundary issues that may need to be addressed in a future replacement local plan to be prepared under the Levelling Up and Regeneration Act 2023 and / or in the forthcoming spatial development strategies for the West Midlands.

Policy DS1 part 4 refers to the Council undertaking a comprehensive review of certain specified things to assess whether a full or partial review of the Plan is required. However, the Levelling Up and Regeneration Act 2023, associated regulations and forthcoming revisions to the NPPF will set the legal and national planning framework for the preparation of the Council's next local plan. The forthcoming spatial development strategies will also be relevant. Parts of the policy serve no purpose in that context, and other parts are either out of date or unjustified.

AP49 Council to prepare modifications to the Plan to delete policy DS1 parts 3 and 4, and policy DS2 and associated reasoned justification.

JE2.4 Baginton Fields

The available evidence does not indicate that there is a reasonable prospect that 25 hectares could be viably developed for industrial and storage / distribution uses whilst complying with policy DS4 (part B), other relevant policies in the Plan and national policies including those relating to safe and suitable access, sport and recreation, and biodiversity.

The Plan therefore needs to be modified to delete the allocation, or the Council needs to provide further evidence to justify its inclusion in a modified form. If the Council chooses to provide further evidence, we will consider that at a further hearing session.

AP50 Council to prepare a potential modification to delete allocation JE2.4 Baginton Fields.
OR
Council to provide the following:
(a) A map indicating existing land uses and land ownerships within the allocation (and adjoining land if necessary).
(b) A map indicating how the allocation could be developed including developable areas; point(s) of access; internal road layout; local nature reserves / local wildlife sites; and any other significant physical features or policy designations.
(c) A brief supporting statement explaining how the indicative layout could be viably achieved.

JE2.7 Durbar Avenue

The available evidence does not indicate there is a reasonable prospect that allocation JE2.7 will be available for development by 2042.

AP51 Council to prepare a modification to delete allocation JE2.7 from the Plan.

JE2 Provision of employment land and premises

AP52 Council to prepare a potential modification to policy JE2 to read as follows (or similar):

"1. The following sites are allocated for industrial and storage / distribution development between 2024 and 2042:

JE2.3 Land at Whitley Business Park	6.5 hectares
JE2.4 Land at Baginton Fields	10 hectares*
JE2.5 Eastern Green mixed use site (H2.2)	15 hectares
JE2.6 Whitmore Park mixed use site (H2.4)	2.9 hectares
JE2.8 Aldermans Green Road / Sutton Stop mixed use site (H2.7)	1.5 hectares
JE2.? Land north of A45 west of Brickhill Lane	11.8 hectares**
Total	47.7 hectares***

2. JE2.1 Land at Friargate is allocated for around 27,100 sqm of additional office floorspace between 2024 and 2042 as part of a mixed use development (H2.38)."

* Inclusion of JE2.4 and reference to 10 hectares (based on oral evidence at the week 2 hearing session) is subject to AP50 above.
** See AP56 below.
*** Subject to AP50 and AP56.

AP53 Council to prepare changes to the policies map to amend the employment allocations to include only the land remaining available for development on 1 April 2024.

Strategic employment development

The main economic evidence upon which the submitted Plan is based includes the HEDNA (which covers the wider functional economic area), the West Midlands Strategic Employment Sites Study 2024[2], and the Strategic Employment Sites Study and HEDNA Alignment Paper September 2024 ("Alignment Paper")[3]. That evidence indicates a significant need for land in the Coventry and Warwickshire functional economic area to accommodate large scale developments (units of at least 9,000 sqm) on sites over 25 hectares well related to the strategic road network in addition to individual authorities' local needs.

The Plan does not quantify what the additional need is for employment land to accommodate large scale development on strategic sites in Coventry. However, paragraph 5.14 refers to a need for between 136 and 311 hectares across the Coventry and Warwickshire area. More recent evidence submitted during the examination updates those figures (to between 184 and 359 hectares) and indicates a need for between 59 and 134 hectares in the M6 / A45 / A46 / M45 Coventry and Rugby Area[4].

Policy DS1 part 1c in the submitted Plan states that allocation JE2.4 Baginton Fields meets the 25 hectare and above criterion and can therefore contribute to sub regional need. However, that allocation is subject to AP50 above. The available evidence does not identify any other sites in Coventry suitable and available for large strategic developments. It is not, therefore, necessary for us to reach a conclusion about the available evidence for the amount of land that may be needed to accommodate large scale development on strategic sites in the wider functional economic area as it would not assist our assessment of the soundness of the Plan or how it may need to be modified.

AP54 (a) Council to prepare a potential modification to paragraph 5.14 (and to delete 5.20) to read as follows (or similar):
"The HEDNA (2022) along with subsequent Alignment Papers (2024 and 2025) indicate that a significant amount of land is needed in the Coventry and Warwickshire functional economic area, including in the M6 / A45 / A46 / M45 Coventry and Rugby area, to accommodate large scale developments (units of at least 9,000 sqm) on sites over 25 hectares well related to the strategic road network.

[2] EB11.
[3] EB10.
[4] M2/1b Addendum to the Coventry and Warwickshire Alignment Paper November 2025.

That need for strategic sites in the wider area is in addition to the need for at least 96 hectares to meet Coventry's local employment land needs. The only allocation in the Plan that could contribute to meeting those wider strategic needs is JE2.4 Baginton Fields (?? hectares*)".

* Subject to AP50 above.

Employment windfalls

The Council published an Employment Windfall Paper on 3 December 2025 along with an accompanying note[5]. This indicates that over the last ten years, an average of 3.9 hectares per year were developed for industrial and storage / distribution uses on sites not specifically allocated for employment development in the adopted plan. Applying a 30% discount rate to avoid over estimating future potential would result in an annual rate of 2.75 hectares. If that figure were applied from 2028 (to avoid double counting with commitments), it would give a total windfall allowance of 35.75 hectares up to 2041.

However, that approach does not seem to take account of losses of existing employment land to residential and other uses. Furthermore, much of the past windfall development was on existing employment land. It is not clear to us the extent to which development on, or redevelopment of, such land would contribute to meeting the identified need for at least 96 hectares of additional employment land. That is because such development would not create additional hectares of employment land (the metric used in the Plan to define needs), it may not create any net additional floorspace, and not all of the identified need is for replacement of existing stock.

Irrespective of that, national policy does not suggest that local plans include a windfall allowance for employment development. Rather it expects local plans to positively and proactively encourage sustainable economic growth, and be flexible enough to accommodate unanticipated needs and enable a rapid response to changes in economic circumstances. Relying on windfalls to make a significant contribution to meeting the need for additional employment land would seem to be at odds with that expectation.

The submitted Plan does not include an employment land windfall allowance and we do not consider it appropriate to modify it to include one. The reasoned justification could, however, be modified to refer to the Council's annual monitoring report recording the amount of employment development (hectares and sqm of floorspace) and assessing how that, including on windfall sites, relates to the identified need for at least 96 hectares between 2024 and 2042.

AP55 Council to prepare a potential modification to the relevant part of the reasoned justification to refer to annual monitoring of industrial and storage / distribution development, including on windfall sites as well as allocations in the Plan.

Land north of A45 west of Brickhill Lane

[5] PS11 and PS11a.

The Plan does not allocate sufficient land to meet the identified need for industrial and storage / distribution uses. The submitted Plan refers to a shortfall of 45 hectares. Based on the above action points, the shortfall against a minimum need for 96 hectares is around 60 hectares for a modified plan period of 2024 to 2042. Even if windfall developments materialised as suggested by the Council, there would still be a significant shortfall of around 25 hectares.

The Council has attempted over several years to identify opportunities to accommodate industrial and storage / distribution developments, including through redevelopment of existing employment areas and calls for new sites. On the basis of the evidence before us, the only land being promoted for industrial and storage / distribution development in the city that is not allocated in the Plan is an 11.8 hectare site to the north of the A45 and west of Brickhill Lane ("the omission site").

That omission site is in the Green Belt, and the Council chose not to allocate it in the Plan, despite knowing that the allocations it did make were insufficient to meet its own assessment of need for employment land. That was a planning judgement informed by the Council's Green Belt review[6] and sustainability appraisal in the context of NPPF 2023 which did not directly require local authorities to remove land from the Green Belt to meet development needs (although see below regarding NPPF paragraph 11).

The Minister wrote to the Planning Inspectorate's Chief Executive on 9 October 2025 advising as follows:

Whilst it is the role of strategic policy-making authorities to decide to review Green Belt boundaries where they are unable to meet development needs, I am revoking the letter issued in March 2014 by the then Minister Nick Boles. This is to ensure PINS can fully play their part in helping to give local plans the best chance of being found sound. This provides PINS, where necessary, with the option to recommend as part of the examination that a Green Belt review is undertaken to consider whether additional sites could be identified, in line with national policy, to meet development needs[7].

Paragraph 11 of NPPF 2023 expects development needs to be met in full, other than in certain defined circumstances one of which is whether the application of NPPF policies protecting the Green Belt represent a strong reason for restricting the scale, type or location of development. That is a test that we think we should apply in the context of the ministerial advice set out above as that is a statement of national planning policy relevant to this examination as referred to in paragraph 35d of NPPF 2023.

The Council confirmed at the hearing session on 16 April that development on the omission site could be served from the recently constructed access from the A45 that serves the Eastern Green strategic urban extension development to the south. The Council's evidence does not identify any technical or planning policy reasons

[6] EB35 and EB37.

[7] **Local Plan examinations: letter to the Chief Executive of the Planning Inspectorate (October 2025)**

that would prevent development of the omission site, other than harm to the Green Belt and rural landscape[8].

We agree that development of the omission site would have an adverse impact on the rural character and appearance of the area, significantly reduce the site's openness, and cause harm to the purposes of including land in the Green Belt. Our assessment of that harm is as follows:

- check the unrestricted sprawl of large built-up areas - moderate
- prevent neighbouring towns merging into one another - limited
- assist in safeguarding the countryside from encroachment - high
- preserve the setting and special character of historic towns - none
- assist in urban regeneration – none

National policy gives significant weight to supporting economic growth. The site would increase the amount of land allocated in the Plan by around 12 hectares or 33% and thereby make a significant contribution to reducing the shortfall in the short to medium term. Development would provide additional choice of modern industrial and storage / distribution units to help meet local needs.

On balance, therefore, at this stage of the examination we do not consider that the application of NPPF policies protecting the Green Belt represents a strong reason for not allocating the site. Nor do we think that the adverse impacts of developing the site would significantly and demonstrably outweigh the benefits.

We therefore consider at this stage of the examination that the significant contribution that the site would make in helping to meet Coventry's need for additional land for industrial and storage / distribution uses in the context of the city's constrained land supply represent exceptional circumstances that justify removing the land from the Green Belt to allocate for development.

AP56 Council to prepare a modification to the Plan to allocate the omission site north of A45 west of Brickhill Lane for industrial and storage / distribution development.

Tables 5.1 and 5.2 – summary of employment land supply

AP57 (a) Council to prepare modifications to Tables 5.1 and 5.2 to summarise the employment land supply 2024 to 2042 based on the above action points.
(b) Council to modify the reasoned justification to explain how the land supply summarised in Table 5.1 (as modified) relates to the minimum of 96 hectares to meet local employment needs identified in policy DS1 and therefore what the city's unmet need is.
(c) Council to modify paragraph 5.18 to explain how the land supply in Table 5.2 relates to the need for 43,046 sqm of additional office floorspace between 2024 and 2042 identified in policy DS1.

[8] EB12 HELAA site ref BAB-016-24.

H2.16 Carlton Road / Old Church Road

The evidence does not indicate there is a reasonable prospect that allocation H2.16 Carlton Road / Old Church Road will be available for development by 2042.

AP58 Council to prepare a modification to delete allocation H2.16 from the Plan.

H2.20 Durbar Avenue

The evidence does not indicate there is a reasonable prospect that allocation H2.20 Durbar Avenue will be available for development by 2042.

AP59 Council to prepare a modification to delete allocation H2.20 from the Plan.

Housing supply

AP60 Council to update the housing trajectory published 8 April 2026 [PS20d] to:

- Cover a modified period 2024 to 2042.
- Reflect modifications recommended in relevant action points.
- Delete "other identified capacity" (and associated figures from 2033/34 onward).

AP61 Council to prepare a potential modification to Table 6.1 to summarise the housing land supply for the modified plan period 2024 to 2042:

- Completions 1 April 2024 to 31 March 2025.
- Allocations remaining capacity at 1 April 2025.
- Capacity on sites with planning permission at 1 April 2025 not allocated.
- Windfalls from 1 April 2028.

Five year requirement and supply following adoption

Based on a modified plan period 2024 to 2042, we consider that the five year requirement following adoption (ie for the period 1 April 2027 to 31 March 2032) is 8,621 net additional dwellings. That is based on the following:

- 1,447 x 5 = 7,235
- Actual shortfall in completions 2024/5 = 642
- Trajected "surplus" over completions 2025-27 = 40
- 642 – 40 = 602
- 7,235 + 602 = 7,837
- 7,837 x 10% (NPPF 2023 and associated PPG)[9] = 784
- 7,837 + 784 = 8,621

AP62 Council to prepare a potential modification to the reasoned justification for policy H1 and/or H2 to summarise the five year requirement and supply for the period 2027 to 2032.

[9] 10% buffer based on PPG ID: 68-010-20190722, and oral evidence at hearing session on 14 April including from DLP on behalf of the Council.

Simon Dean   William Fieldhouse

11 May 2026