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

Response of Coventry City Council

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).

> **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."

Policy DS1 to be modified as follows:

1. Over the Plan period ~~2021-2041~~ significant levels of housing and employment will be planned for and provided along with supporting infrastructure and environmental enhancements. The following minimum amounts of development are required to meet the city's identified needs:

   a. A minimum of ~~29,100~~ 26,046 additional homes between 2024 and 2042.
   b. 18 additional pitches for Gypsy and Traveller accommodation between 2022 and 2042
   ~~c.~~ A minimum of ~~60~~ 96 ha of ~~employment land~~ land for industrial and storage / distribution development between 2024 and 2042 to meet local needs ~~within the city's administrative boundary, including:~~
      ~~i. the continued expansion of Whitley Business Park; and~~
      ~~ii. 15 ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension (SUE).~~

d. ~~25~~ 9.8 ha, to be provided at Baginton Fields, to contribute to sub regional need in Coventry and Warwickshire.
e. 3,844 sqm (net sales area) of additional convenience retail floorspace between 2024 and 2034.
f. 8,155 sqm (net sales area) of additional comparison retail floorspace between 2024 and 2034.

2. A minimum need of ~~41,200~~ 43,046 sqm ~~overall~~ additional office floorspace between 2024 and 2042 ~~provision~~ to include ~~39,549~~ 27,100 sqm of office floor space at Friargate in compliance with Friargate Allocation JE2:1 with the remainder of 15,946 sqm delivered in compliance with the criteria set out in Policy JE4.

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).

Modifications to the reasoned justification to DS1 are proposed as follows. Please note these also include modifications proposed through our responses to AP48. We have also included the other paragraphs here to provide the context for the modifications.

Housing Need

3.6 In terms of housing, the NPPF (December 2023) sets out in Paragraph 61 that strategic policies should be informed by a local housing need assessment, conducted using the standard method which is an ‘advisory starting point’. However, it goes on to explain that there may be exceptional circumstances, including those relating to particular demographic characteristics.

3.7 In Coventry’s case, the Coventry and Warwickshire HEDNA found that there had been notable issues with the Office for National Statistics (ONS) population estimates for Coventry with the 2021 Census indicating that population had been significantly over-estimated. It was concluded that exceptional circumstances existed to deviate from the Standard Method for assessing local housing need because the basis upon which the Standard Method was based utilised erroneous data (the 2014-based Household Projections).

3.8 Given that new data had emerged since the production of the HEDNA in 2022, Coventry City Council commissioned an update in relation to its own housing need (Review of Coventry’s Local Housing Need June 2024). This concluded that the HEDNA remained a reliable basis for plan-making.

3.9 Through the process of the examination of the Local Plan the Local Housing Need for Coventry for the period ~~2021-2041~~ 2024-2042 ~~is therefore 29,100~~ has been determined to be 26,046 net additional homes (~~1,455~~ 1,447 per annum) and this will be delivered fully within Coventry’s administrative area through an urban and brownfield-focused strategy of allocations, regeneration, windfall and densification as set out in the Housing and City Centre chapters of this reviewed plan.

3.10 In terms of Gypsy and Traveller need, this is determined by the Gypsy and Traveller Accommodation Assessment (GTAA) (2023) and identifies a need of 18 pitches between 2022 and 2042 to be accommodated on existing sites as set out in Policy H7.

Employment Land Needs

~~3.10~~ 3.11 In terms of employment, the HEDNA provides the starting point for the overall amount of employment which is needed over the plan period and this covers the Coventry and Warwickshire area.

~~3.11~~ 3.12 However alongside this, work has been undertaken across the wider West Midlands region to understand the needs of large scale warehousing and logistics industries, the 'big box' units which are an increasing part of the economy both locally and nationally and which generally need sites of 25 hectares and above to function effectively (subject also to locational requirements). The West Midlands Strategic Employment Sites Study (WMSESS) 2024 has therefore been jointly produced by several Local Authorities across this area to guide this work.

~~3.12~~ 3.13 Because the HEDNA was produced before the WMSESS, the Coventry and Warwickshire authorities jointly commissioned an 'Alignment Paper' (~~September~~ November 2024) to ensure all evidence was consistent, and up to date in terms of need, supply and any residual need (i.e. any remaining need which each of the Coventry and Warwickshire authorities would need to plan for). Through the process of the Local Plan Examination, a local need of 96 hectares of land for industrial and storage / distribution development was identified for the period 2024 to 2042 based on gross completions trends on non-strategic sites in the City over the 2011-24 period. The Council has a supply of 43.85 hectares of employment land. This supply relates to the allocations identified in Policy JE2 (with the exception of Baginton Fields which will contribute towards meeting strategic need) plus 6.2 hectares supply on non allocated sites. This leaves a remaining shortfall of 52.15 hectares for local need.

3.14 Delivery of employment sites to address this shortfall will be addressed through co-operation with neighbouring authorities in the FEMA. Delivery against the target of 96 hectares over the plan period of 2024-42. and associated extent of the shortfall will be monitored and reported through the Council's Annual Monitoring Report (AMR), recording the amount of employment development (hectares and sqm of floorspace) including development on windfall sites - a strong historic track record of which is shown through the Windfall evidence paper (November 2025). The AMR will also record contributions from the FEMA authorities in terms of sites allocated to help address the shortfall, and whilst it will be for those Local Authorities to monitor progress on sites within their own administrative areas, the Coventry AMR will provide an annual update on progress.

~~3.13~~ 3.15 Further detailed evidence has been prepared in terms of the Employment Land Review (ELR) and Office Market Addendum in terms of how employment need should be planned for, and this includes allocations and the identification of key sites as set out in the Employment chapter. Office needs have been assessed through the evidence base and Local Plan examination to understand further detail about the quantum needed and changing demand for space and flexibility, given altered patterns of working especially post pandemic where hybrid working and use of technology is now commonplace. There is a requirement for 43,046 sqm of additional office floorspace between 2024 and 2042. 27,100 sqm will be provided within the Friargate allocation as set out in Policy JE2.

~~3.14 In terms of office need , Coventry City Council is able to accommodate this, primarily but not exclusively within a revised Friargate allocation. In regard to local employment need (use classes E(g) (iii), B2 and B8), the City Council is able to accommodate 60 hectares of employment need, with a remaining shortfall of 45 ha which it is not able to accommodate within its own boundaries.~~

~~3.15~~ 3.16 ~~The above is for local need.~~ In terms of a contribution to the wider strategic employment need, one allocation contributes to meeting ~~meets~~ this, Baginton Fields~~, which is 25 hectares in size~~. Ongoing work is continuing with partners ~~under the Duty to Co-operate to work collaboratively and constructively~~ to address strategic need as, being a constrained area, no further opportunities are available in Coventry.

~~3.16~~ 3.17 In terms of retail provision, this has been informed by the Retail and Centres Study 2024 and through the process of the Local Plan Examination. It has been determined that a ten year period (2024 – 2034) is appropriate for determining retail requirements of 3,844 sqm (net sales area) of additional convenience retail floorspace and 8,155 sqm (net sales area) of additional comparison retail floorspace as set out in the retail policies in section 7 of the Local 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.

Modifications as follows:

~~3. Notwithstanding the above, Coventry's employment need for the period 2021 to 2041 is for 105 ha of employment land (including qualitative replacements). It is not possible to deliver all of this additional development land within the city boundary. As such, the Council will continue to work proactively with neighbouring Councils through the Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Functional Economic Market Area.~~

~~4. The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data within 5 years of the date of adoption of the plan to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on that review will commence immediately.~~

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 map indicating existing land uses and land ownerships within the allocation (and adjoining land if necessary). 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. A brief supporting statement explaining how the indicative layout could be viably achieved.

- A proposed revised boundary for the allocation can be seen at Appendix 1 to this IN13 response. A map indicating existing land uses and land ownerships is provided at Appendix 2.
- An indicative layout plan has been prepared at Appendix 3, informed by existing policy designations. The indicative layout shown is informed by plans prepared by an interested party (appendices 4, 5 and 6) which have been presented to the CCC Economic Development Team.

Supporting Statement

Since the 2017 Local Plan, the context of Allocation JE2.4 has significantly developed with the establishment by the Ministry of Housing, Communities and Local Government of the West Midlands Investment Zone in 2023 within which the employment allocation JE2.4 is located. Additionally the physical site context has evolved with the delivery of highways infrastructure crossing the A45 and linking the Northern and Southern elements of the Investment Zone. As part of the Investment Zone initiative, MHCLG have stated that up to £40m of funding is intended for infrastructure measures to improve travel and power connections to the three areas designated within the West Midlands Investment Zones, including the Coventry and Warwick Gigapark. https://www.gov.uk/guidance/investment-zones-in-england

A key element of the Investment Zone includes a mechanism allowing the regional government (West Midlands Combined Authority) to retain 100% of the business rates generated within the Investment Zone over a 25 year period (through to 2049). These retained rates can be recycled into a variety of uses, one of which is to support site delivery through enabling infrastructure. The funding can be used to unlock stalled or marginal sites to enable their development, this is applicable to allocation JE2.4 as this mechanism could provide funding to site development barriers, such as the required site access over the River Sowe.

The indicative site layout provided in response to AP50 has been informed by the current and proposed policies which protect the Local Wildlife sites from development and shows a proposed new point of access from Scimitar Way crossing the River Sowe. The supplied land ownership plan at Appendix 2 identifies that Scimitar way is currently within the ownership of Jaguar Land Rover Group, and a strip of land aside the River Sowe being in the ownership of the Coventry and Warwickshire Development Group, of which SEGRO is a major partner. The City Council are currently actively working to adopt the highway around the junction of Scimitar Way and Firefly Road which would further assist in the the delivery of the necessary work to create site access.

The indicative layout at Appendix 3 has been informed by developer-prepared layouts, including an analysis of site constraints which are supplied at Appendices 4 to 6. These layouts - prepared by an interested developer - have been presented to the City Council's Property and Economic Development teams, and have informed the indicative layout which aligns with the proposed revised employment allocation boundary. In support of development of the allocation, the proposed plan modification agreed with Sport England at policy GE2 Part3 ensures that replacement provision of playing pitches which are currently located on site, will be secured through the development management process.

Discussions between CCC Economic Development and interested parties remain ongoing to pursue development of the site to contribute to the employment supply for the City. The Council consider that the combination of developer interest, investment zone designation, highways adoption proposals and the opportunities to access funds toward necessary infrastructure investment mean that the land identified in the proposed boundary revision to allocation JE2.4 represents a reasonable and realistic prospect to contribute to the employment development needs of City, whilst ensuring the protection of designated Local Nature Reserves and Local Wildlife Sites.

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.

Site ref	Site	Ward	Site Area (as allocated (ha) in 2017 adopted plan)	Allocation (local Plan review) – area remaining (ha unless specified	Comments

				otherwise)	
~~JE2:7~~	~~Durbar Avenue (part of mixed use site)~~	~~Foleshill~~	~~1.5~~	~~1.5~~	~~Application awaited~~

<u>JE2 Provision of employment land and premises</u>

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.

Modifications are proposed as follows:

Policy JE2: Provision of Employment Land and Premises

1. ~~A total of 52 ha of land is allocated for employment development within the city's administrative area, plus 27,100 sq m remaining floorspace at Friargate as part of a wider mixed use allocation. The allocations are as specified below together with details of the type of employment development that will be promoted on each of these sites~~. <u>The following sites are allocated for industrial and storage / distribution development between 2024 and 2042:</u>

Site ref	Site	Ward	<u>Overall allocated</u> Site Area ~~(as allocated (ha) in 2017 adopted plan)~~	Allocation ~~(local Plan review)~~ – area remaining (ha ~~unless specified otherwise~~)	Comments
~~JE2:1~~	~~Friargate (part of mixed use scheme)~~	~~St Michaels~~	~~7~~	~~27,100sqm office floorspace (part of mixed use~~	~~6.52ha remaining overall site~~

				~~development)~~	~~area. Friargate 1 and 2 delivered.~~
~~JE2:2~~	~~Lyons Park~~	~~Bablake~~	~~19~~	~~0~~	~~Delivered~~
JE2:3	Whitley Business Park	Cheylesmore	30	6.46	Part delivered
JE2:4	Land at Baginton Fields and South East of Whitley Business Park	Cheylesmore	~~25~~ 9.8	~~25~~ 9.8	Application awaited
JE2:5	A45 Eastern Green (part of mixed use site)	Bablake	15	15	~~Outline application received~~ Under construction
JE2:6	Whitmore Park (part of mixed use site)	Holbrook	8	2.89	Part delivered
~~JE2:7~~	~~Durbar Avenue (part of mixed use site)~~	~~Foleshill~~	~~1.5~~	~~1.5~~	~~Application awaited~~
JE2:8	Land at Aldermans Green Road and Sutton Stop (part of mixed use site)	Longford	1.5.	1.5	Application awaited
JE2:9	Land north of A45 west of Brickhill Lane	Bablake	N/A	11.8	Application awaited
	Total		~~107ha~~ 64.3	~~52.35 (excludes Friargate office floorspace figure)~~ 47.45	

2. ~~The Friargate, A45 Eastern Green, Whitmore Park, Durbar Avenue and Alderman's Green Road and Sutton Stop employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.~~ 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).

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.

These have been added to the schedule of changes to the Policies Map.

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, and the Strategic Employment Sites Study and HEDNA Alignment Paper September 2024 ("Alignment Paper"). 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.

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. 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.

Please see our response to AP57 where, for clarity, we have put all of the proposed modifications together in terms of the reasoned justification to Policy JE2 (Provision of Employment Land and Premises)

Employment windfalls

The Council published an Employment Windfall Paper on 3 December 2025 along with an accompanying note. 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.

This has been included in our response to AP48 (modifications to the reasoned justification to Policy DS1), paragraph 3.14.

<u>Land north of A45 west of Brickhill Lane</u>

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 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.

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

Site to be added into the table in point 1 of Policy JE2 as follows:

Site ref	Site	Ward	Site Area (as allocated (ha) in 2017 adopted plan)	Allocation (local Plan review) – area remaining (ha unless specified otherwise)	Comments
<u>JE2:9</u>	<u>Land north of A45 west of Brickhill Lane</u>	<u>Bablake</u>	<u>N/A</u>	<u>11.8</u>	<u>Application awaited</u>

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.

Response to AP57 Part a (tables)

A modification is proposed to Table 5.1 as follows:

Table 5.1 – Class B2 and B8 local employment land supply components for Coventry

~~Supply components~~	~~Site Size (Ha)~~
~~Completions 2021-2024*~~	~~25.4~~
~~Committed supply~~	~~6.2~~
~~Remaining allocations from adopted 2017 Local Plan carried forward (where not included above)**~~	~~28.6~~
~~Total~~	~~60.2~~

~~*data up to 31 March 2024~~

~~** Includes 1.2ha at Austin Drive HELAA site. Excludes 25ha at Baginton Fields which is for strategic B8~~

Replace table 5.1 as follows:

Local Need supply components (April 2024)	Supply (hectares)
Committed supply (non allocated sites with planning permission)	6.2
Allocations remaining capacity (Policy JE2)*	37.65
Total local supply	43.85

*Excludes Baginton Fields which is identified to meet strategic need

A modification is proposed to Table 5.2 as follows:

Table 5.2 – office supply components for Coventry

Supply components	Site size (sq.m)
~~Completions 2021-2024~~	~~22,299~~
~~Committed supply~~	~~24,940~~
Allocations ~~from adopted 2017 Local Plan carried forward (where not included above)*~~	27,100
Total	~~74,339~~ <u>27,100</u>

Response to AP57 parts b and c.

These have been taken together to show proposed modifications to the reasoned justification to Policy JE2.

Provision of Employment Land and Premises

5.13 Employment land should be provided to meet the needs of all employment uses – offices, research and development, light/general industrial and storage/distribution. These uses have varying land requirements. Office occupiers tend to seek city centre locations, research and development occupiers often require sites with close links to the universities whilst industrial and storage/distribution occupiers prefer sites which have good access to the strategic highway network and are not constrained by their proximity to neighbouring sensitive land uses such as housing. Sites of varying size are also required to meet the needs of both large and small businesses.

5.14 <u>The quantum of Local Employment need is set out in the Reasoned Justification to Policy DS1 along with a summary of supply and the resultant shortfall. Table 5.1 sets out the components of the supply in relation to local need, which includes the employment allocations in Policy JE2 (the remaining capacity of those sites from the plan start date). The supply also includes 6.2 ha of existing commitments on non allocated sites. It does not include the allocation for Baginton Fields (JE2.4) as this is identified to meet strategic need.</u>

~~5.14~~ <u>5.15</u> ~~The HEDNA (2022) along with the subsequent Alignment Paper (2024) sets out that for Coventry between 2021 and 2041 105 hectares of employment land (use Classes B2 and B8) is required. This does not include the strategic 'big box' need which is set out in the alignment paper as between 136 – 311 ha across the Coventry and Warwickshire sub region.~~ <u>The HEDNA (2022) along with subsequent Alignment Papers (2024 and 2025) indicate that there is a need for additional strategic employment sites in the Coventry and Warwickshire functional economic area, including in the M6 / A45 / A46 / M45 Coventry and Rugby area, principally to accommodate large scale units of at least 9,000 sqm on sites which are well related to the strategic road network. That need</u>

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, linked to the wider West Midlands Investment Zone, is JE2.4 Baginton Fields (9.8 hectares).

~~5.15~~ 5.16 In addition the ELR Office Market Addendum (2024) and consideration through the Local Plan examination establishes a~~n indicative~~ minimum need of ~~41,200~~ 43,046 sqm. office floorspace provision between 2024 and 2042 with a recommendation for flexibility to allow for the ability to respond to changing markets.

~~5.16~~ 5.17 Table 5.1 below provides a summary of the employment land supply components for Class B2 and B8

~~5.17~~ 5.18 Table 5.2 below provides a summary of the employment land supply components for office uses

~~5.18~~ 5.19 In terms of office allocations ~~Coventry is able to meet its own need, through a majority of provision through a reviewed Friargate allocation. Since 2021, Friargate has delivered 12,449 sq.m floor space at Friargate 2 (Friargate One was delivered prior to the start of the plan review period), and a further~~ 27,100 sq m will be provided as part of the Friargate mixed use allocation. This ~~totals 39,549 sq.m delivery at Friargate over the plan period, leaving a residual amount of around 1,650~~ leaves 15,946 sqm to be delivered in line with the approach set out in Policy JE4

~~5.19 In terms of remaining local employment needs excluding office provision 60 hectares for local need can be accommodated taking into account supply, 32 completions and allocations, leaving a residual need of 45 hectares. The city is unable to meet its need in full which has already been highlighted through Policy DS1 and reflects the importance of the Duty to Co-operate in ensuring the employment land needs of the sub region are met.~~

~~5.20 In terms of strategic employment the Baginton Fields (Policy JE2:4) allocation meets the 25 hectares and above criterion and is to be retained as an allocation to contribute to the wider strategic needs of the sub-region, and again the Council will work with partners to ensure strategic needs are met.~~

~~5.21~~ 5.20 The Employment Land Review assessed Coventry's existing employment sites and concluded that a number of these were particularly important in maintaining a resilient and varied employment stock: these are designated as Key Employment Sites. Employment sites are shown on the Policies Map.

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.

Site ref	Site	Ward	Indicative capacity	GF / PDL	Essential site specific requirements and other uses	HELAA ref.
~~H2:16~~	~~Land at Carlton Road / Old Church Road~~	~~Foleshill~~	~~85~~	~~PDL~~	~~Retention of chimney, art-deco façade and railings of former weaving mill.~~	

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.

Site ref	Site	Ward	Indicative capacity	GF / PDL	Essential site specific requirements and other uses	HELAA ref.
~~H2:20~~	~~Land at Durbar Avenue~~	~~Foleshill~~	~~45~~	~~PDL~~	~~As part of mixed use scheme to deliver 1.5ha of redeveloped employment land (Policy JE2).~~	

Housing supply

AP60 Council to update the housing trajectory published 8 April 2026 [PS20d] to: a. Cover a modified period 2024 to 2042. b. Reflect modifications recommended in relevant action points. c. Delete "other identified capacity" (and associated figures from 2033/34 onward).

In response to AP60 an updated trajectory for the period 2024 to 2042 is included at Appendix 7.

For illustrative purposes to demonstrate confidence in supply, a second trajectory has been included at Appendix 8 incorporating updated information to reflect the latest permissions on sites already allocated in the Local Plan. This reflects the approval of Reserved Matters applications at Sutton Stop and Phase 4 of the Eastern Green SUE.

Although both reserved matters applications were approved in 2025/26 (i.e. after 31st March 2025), they have been incorporated into this second trajectory as they do not alter the dwelling numbers established at the outline stage. However, their approval has accelerated anticipated delivery timescales, with both sites now having commenced development.

As a consequence of these updated reserved matters approvals, the post-adoption five-year housing requirement, covering the period 1 April 2027 to 31 March 2032 and based on a modified plan period 2024 to 2042, could be considered as follows (using the approach set out in the preamble to AP62):

- 1,447 x 5 = 7,235
- Actual shortfall in completions 2024/5 = 642
- Trajected "surplus" over completions 2025-27 = 152
- 642 – 152 = 490
- 7,235 + 490 = 7,725
- 7,725 x 10% (NPPF 2023 and associated PPG)[9] = 773
- 7,725 + 773 = 8,498

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:

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

Table 6.1 Components of housing supply ~~2021-2041~~ 2024-2042

Housing land supply components (data to ~~30/09/24~~ 01st April 2025)	Number of homes
Past net completions 1 April 2024 - 31 March 2025	~~7,666~~ 805
~~Committed supply~~	~~13,9975~~
~~Remaining allocations (2017 Local Plan)~~ Allocations remaining capacity at 1 April 2025	~~2,733~~ 14,415
~~Proposed new site allocations (local plan review)~~	~~3,503~~
~~Other identified sites (HELAA)~~	~~816~~
Capacity on sites with planning permission at 1 April 2025 (sites not allocated)	3,994
Windfall Allowance	2,800
Total	~~31,493~~ 22,014

Modifications are proposed to paragraphs 6.1 and 6.10 of the reasoned justification accordingly.

6.1 Since 2011, the Authority's Annual Monitoring Reports show strong performance overall of housing delivery against the Local Plan requirement. The ~~2022/3~~ 2024/25 monitoring year showed cumulative delivery of ~~24.6%~~ 22.1% above the Local Plan requirement of ~~14,200~~ 16,800 at this stage in the projection.

6.10 The HEDNA identifies a local housing need of 1,455 per annum over the plan period. The latest affordability data was released by ONS in March 2025 and relates to 2024. This provided an affordability ratio of 5.86 which if applied to the HEDNA demographic projections (see 2024 Review of Coventry's Housing Need Table 5.3) would generate a need for 1,447 dpa, or ~~29,100~~ 26,046 in total across the plan period. Following a thorough consideration of extant planning permissions, sustainable development principles ~~and~~ in accordance with the NPPF, an assessment of land options through the Call for Sites, ~~and~~ the HELAA and a density study informing a strategy of increased densification, a ~~capacity~~ supply of around ~~31,954~~ 22,014 homes has been identified, ~~which provides a degree of flexibility above the local need figure of 29,100~~. Table 6.1 below identifies the Council's housing land supply and sets out how the requirement will be met.

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**

[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

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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.

The five-year requirement calculated for the purposes of the housing trajectory in this Local Plan reflects applicable national policy for plan-making. The Local Plan timetable anticipated adoption within the 2026/27 monitoring year. The five year period following the intended date of adoption therefore commences on 1 April 2027 for the purposes of the Local Plan Housing Trajectory. The monitoring base date for the assessment of deliverability of sites and identification of commitments applicable at this base-date, reflecting information available to the Examination, is 1 April 2025.

The housing trajectory provides the assessment of whether the Plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded. To confirm a five year supply for the purposes of its examination a 10% buffer is applied to calculation of the five-year requirement. This allows the calculation within the Local Plan to account for potential fluctuations in the market over the year and provides robustness and flexibility in supply.

Based on the calculation set out in the preamble to AP62, a requirement of 8,621 homes and a supply of 8,397 homes would result in a 5 year supply of 4.87 years and a modification to paragraph 6.11 is proposed accordingly.

6.11 The trajectory contained in Appendix 3 shows how development will be delivered over the plan period. <u>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 calculation:</u>

- 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% buffer = 784
- 7,837 + 784 = 8,621

A supply of 8,397 homes has been identified over the period April 2027 to March 2032 resulting in an anticipated supply of 4.87 years on adoption. It should be noted that this position reflects the forecast supply as of 1st April 2025 and does not take account of any permissions or reserved matters approvals since that date. The 2025-27 position is a forecast for future supply up to the intended date of adoption where it is expected that 2026/27 completions will offset shortfalls recorded in 2024/25 and 2025/26 monitoring which reflect a downward fluctuation of development activity in these years.

The above modification has been added to the updated schedule of Main Modifications (V5).

However this calculation is requested to be considered in the context of our response to AP60. Using this alternative calculation, which takes into account recent Reserved Matters approvals, would result in a 5 year supply of 5.01 years and the proposed modification could be updated accordingly.

Further to the adoption of the plan and in line with national policy, the 5 year supply position will be annually published in the Authority’s Annual Monitoring Report, monitoring ongoing market fluctuations, delivery rates and windfall development.