

IN15 Further Actions Points following week 4 hearing sessions

Response of Coventry City Council

JE2.3 Whitley Business Park

AP63 Council to amend the change to the policies map PMC10a to include only “car park F” (approximately 4 hectares) as allocation JE2.3 (within the Key Employment Site as shown on policy map change PMC6g).

The amendments to the policies map have been completed. Car Park F is confirmed as being 2.9 hectares.

JE2.4 Baginton Fields

AP64 Council to clarify whether or not allocation JE2.4 Baginton Fields (as amended on the policies map PMC10b) could accommodate one or more large scale units of at least 9,000 sqm having regard to the likely road layout and site constraints including the trunk sewer.

The Council has, as a starting point, utilised the SEGRO Net Developable Area plan [PS24e] which sections the site into four developable zones. This has then been considered in context with the constraints plan [PS24f], and the parameters plan [PS24d] in terms of the access point information, and taking into account the allocation boundary [PS24a].

In terms of each zone shown in PS24e the assessment is as follows:

- Zone 1 (1.71 ha) has been discounted as this is where the access point would come in as shown in PS24d so a 9000sqm single unit would not be able to be accommodated here.
- Zone 2 (1.62 ha) could potentially accommodate a unit of 9000 sqm.
- Zone 3 is shown as 2.71 ha in PS24e. However, this incorporates the area occupied by Baginton Fields School. In line with the revised site boundary [PS24e] which excludes the school from the allocation, a recalibrated Zone 3 would equate to around 0.8ha and therefore could not accommodate a 9000 sqm unit.
- Zone 4 (0.58 ha) could not accommodate a 9000 sqm unit.

It is therefore possible that a unit of 9000sqm could be accommodated on the site in Zone 2, subject to detailed design. The access would enter the site via Zone 1 [PS24d] and necessary infrastructure such as roads, parking, landscaping and ancillary uses could be provided within zones 1, 3 and 4, taking into account the need to protect constraints such as the sewer identified in PS24f. Service roads could be located over the top of the sewer as part of the overall site layout plan.

The Council similarly accepts that the irregular nature of the identified development parcels and site constraints may incentivise development of units smaller than 9000sqm where servicing and associated infrastructure could then be provided

within each of the identified development plots. Such an approach may reduce the potential operational impacts of any future works associated to the existing trunk sewer on site.

Therefore it has been assumed that the site could contribute to strategic employment need provision, but notwithstanding this it is clear that the site is well located for employment use whether strategic or local.

JE2.5 Eastern Green Strategic Urban Extension

AP65 Council to amend the change to the policies map PMC10c to include only the land to the south of the A45 in employment allocation JE2.5.

The policies map has been amended accordingly.

Land north of A45 west of Brickhill Lane

In responding to the following action points the Council should have regard to the Context and Vision note attached as Appendix 1 to Hallam Land Management's regulation 19 representation. The Council may also wish to liaise with the site promoter.

AP66 Council to amend the change to the policies map PMC10f to include within the potential allocation boundary all of the land defined by a red line on the maps in the Context and Vision note referred to above / the HELAA site ref BAB-016-24¹. The policies map should also be changed to remove the whole of the allocation from the Green Belt.

¹ EB12

The policies map has been amended accordingly.

AP67 Council to prepare a potential new policy DS4 part E setting out site specific requirements for masterplanning the potential allocation north of A45 west of Brickhill Lane.

The wording of the new policy is proposed as follows, incorporating some suggested wording and key themes from the site promoter also taking into account the wider context of the policies of the Plan to ensure consistency.

DS4 Part E – Brickhill Lane Employment Allocation

In addition to the policies of this plan, including the general master planning principles outlined in Policy DS4 (Part A), development proposals which relate to this area should also meet the requirements below:

- New provision should be primarily focused within 'B class' uses unless they are shown to be ancillary and supportive to the overall provision.
- Provide a suitable vehicular access from the existing A45 Pickford Gate roundabout to the south
- Avoid locating any built development in Flood Zones 2 or 3.
- Establish a green and blue infrastructure corridor focused along the Pickford Brook and its tributary.
- Incorporate an appropriate landscaped buffer to protect the amenity of neighbouring residential properties, appropriately mitigating issues of noise, light and air quality alongside minimising visual impact to the surrounding landscape.
- Retain existing mature hedgerows and trees located on site and to the site's periphery.
- In addition to the clear boundaries of the A45, Brick Hill Lane and Oak Tree Lane, the site design must incorporate clear defensible boundaries to the whole of the surrounding Green Belt, having regard to their intended permanence in the long term, so they can endure beyond the plan period.
- Ensure the retention of a public right of way crossing the site, located to deliver an attractive and safe route for users.
- Respect ancient woodland buffers to Pinkett's Wood.
- The development should meet the highest viable BREEAM standards, aiming to achieve Excellent/Outstanding certification, incorporating substantial habitat creation, biodiversity enhancement, sustainable drainage systems, and on-site renewable energy generation. These measures directly support national and local planning policy objectives relating to climate resilience, biodiversity recovery, and sustainable development.
- Avoid harm to Harvest Hill Daffodil Meadow LWS, Pinkett's Wood LWS or Pinkett's Farm Ponds LWS, maintaining an appropriate buffer. The Development of the site should be inclusive of green infrastructure which enhance ecological connectivity of the Local Wildlife Sites.
- Provide a material palette to both built form and hard landscape, which minimizes the visual impact upon the surrounding landscape, including the use of green walling and green parking areas.
- Built form to reduce in scale to the Northern, Eastern and Western site perimeters, resulting in an appropriate scale relationship to surrounding properties.
- Built form should be delivered as a collection of visual elements, incorporating rooflines which respect the surrounding landscape character.
- Undertake a Landscape Visual Impact Assessment (LVIA) to ensure the impact of development upon the surrounding landscape is fully considered.
- Ensure design and layout is informed by an understanding and analysis of the archaeological context of the site. Proposals must be accompanied by an appropriate archaeological assessment that must include the following:
 - Information identifying the likely nature, location and extent of remains.
 - An assessment of the significance of remains; and

- Consideration of how the remains may be affected by any proposed development.
- Ensure that the development provides access to local employment opportunities in line with the requirements of policy JE7.
- Fully integrate Sustainable transport, in accordance with the requirements of the Accessibility policies of the Local Plan, including the provision of a Travel Plan.

AP68 Council to consider whether the potential new policy DS4 part E should be supplemented by an indicative site layout plan (to be included in the Plan) illustrating how the masterplanning requirements could be achieved.

In considering whether policy DS4 part E should be supplemented with an indicative site layout plan, the Council does not consider this to be necessary. The only allocation in DS4 which was supplemented with an indicative layout plan (via the Sustainable Urban Extension Residential Design Guidance Supplementary Planning Document) was Keresley SUE due to the complexity of the site and the various phases involved in bringing it forward. This is not the case with this site which is a single parcel of land, and indicative layouts have already been provided as part of the Regulation 19 submissions. In order to be consistent with the other allocations in DS4 (except Keresley) it is felt that a criteria based approach will suffice, with the detail then being taken forward through the Development Management Process which has, in essence, already begun through the process of obtaining an EIA Screening Opinion [EX9, 9a and 9b].

JE2 Provision of employment land and premises

AP69 Council to amend the potential modification to policy JE2 to refer to 4 hectares at JE2.3 Whitley Business Park (rather than 6.5 hectares).

In line with our response to AP63, the Council confirms that the remaining area of the existing allocation is 2.9ha, and the modification to the table in JE2 Part 1 is amended accordingly as set out below. Please note, the whole table and supporting text is repeated here in full as the totals row has also been modified.

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

Site ref	Site	Ward	Overall allocated Site Area (as allocated	Allocation (local Plan review) – area remaining (ha)	Comments

			(ha) in 2017 adopted plan)	unless specified otherwise)	
JE2:1	Friargate (part of mixed use scheme)	St Michaels	7	27,100sqm office floorspace (part of mixed use development)	6.52ha remaining overall site area: Friargate 1 and 2 delivered.
JE2:2	Lyons Park	Bablake	19	0	Delivered
JE2:3	Whitley Business Park	Cheylesmore	30	6.46-2.9	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 <u>Under construction</u>
JE2:6	Whitmore Park (part of mixed use site)	Holbrook	8	2.89	Part delivered
JE2:7	Durbar Avenue (part of mixed use site)	Foteshill	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	<u>11.8</u>	<u>11.8</u>	Application awaited

	Total		107 ha <u>76.1</u>	52.35 (excludes Friargate office floorspace figure) <u>43.89</u>	
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Table 5.1 Summary of employment land supply

AP70 Council to amend the potential modification to Table 5.1 to reflect AP69 above relating to allocation JE2.3 Whitley Business Park and, if necessary, to ensure the “committed supply” figure accurately reflects the available evidence relating to 1 April 2024.

Version 5 of the Main Modifications (PM5) proposed replacing Table 5.1 in its entirety. A new replacement table will be included in Version 6 of the Main Modifications as follows:

<u>Local Need supply components (April 2024)</u>	<u>Supply (hectares)</u>
<u>Committed supply (non allocated sites with planning permission)</u>	<u>4.68</u>
<u>Allocations remaining capacity (Policy JE2)*</u>	<u>34.09</u>
<u>Total local supply</u>	<u>38.77</u>

*Excludes Baginton Fields which is identified to meet strategic need

AP71 Council to amend the potential modifications to paragraphs 5.13 to 5.16 as necessary to reflect AP70 above (Table 5.1) and AP72 below (paragraphs 3.10 to 3.15).

In V5 of the Main modifications [PM5] the paragraph which relates to the modified figures in table 5.1 above is new paragraph 5.14 (Page 24 of PM5). It is proposed to amend this modification to reflect the existing commitments figure from 6.2 ha to 4.68 ha.

5.14 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 4.68 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.

Employment land needs

AP72 Council to amend the potential modification to paragraphs 3.10 to 3.15 to read as follows (or similar):

3.10 The evidence for employment land needs is set out in the Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA), the West Midlands Strategic Employment Sites Study 2024, and the Strategic Employment Sites Study and HEDNA Alignment Papers 2024 and 2025. That evidence identifies a local need for at least 96 hectares of land for industrial and storage / distribution development in the period 2024 to 2042 based on gross completions trends on non-strategic sites in the City over the 2011-24 period.

3.11 In addition to that local need, the 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 as these are expected to continue play an important economic role both sub regionally and nationally.

3.12 Table 5.1 identifies a total employment land supply of ?? hectares. There is, therefore, a shortfall of at least ?? hectares against the minimum requirement for 96 hectares to meet local needs. None of the employment allocations are expected to be suitable for accommodating units of at least 9,000 sqm to contribute to meeting the significant strategic need referred to above. OR The only allocation that is considered potentially suitable for accommodating one or more unit of 9,000 sqm well related to the strategic road network is JE2.3 Baginton Fields [Depending on the response to AP?? above].

3.13 Delivery against the requirement for at least 96 hectares to meet local needs and associated extent of the shortfall will be monitored and reported through the Council's Annual Monitoring Report (AMR). The AMR will record 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. Whilst it will be for those authorities to monitor progress on sites within their own administrative areas, the Coventry AMR will provide an annual update on progress.

3.14 The Employment Land Review (ELR) and Office Market Addendum identify 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. The rest of the need is expected to be met through the approach set out in policy JE4.

3.15 In terms of retail need, 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.

The needs will be met through development in the town centre network set out in Policy R3 and the allocations in Policy R1.

For ease of referencing it is proposed to delete paragraphs 3.10 – 3.15 in the submitted plan in their entirety as shown as strike-through. These will be replaced with modified paragraphs as set out below (underlined). Paragraphs have been renumbered in the proposed modification to reflect other modifications in the schedule which have resulted in the need for renumbering.

~~3.10 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 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 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 Because the HEDNA was produced before the WMSESS, the Coventry and Warwickshire authorities jointly commissioned an 'Alignment Paper' (September 2024) to ensure all evidence was consistent, and up to date in terms of need, supply and any residual need (ie any remaining need which each of the Coventry and Warwickshire authorities would need to plan for).~~

~~3.13 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 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.~~

~~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 The above is for local need. In terms of a contribution to the wider strategic need, one allocation 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.~~

3.11 The evidence for employment land needs is set out in the Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA), the West Midlands Strategic Employment Sites Study 2024, and the Strategic Employment Sites Study and HEDNA Alignment Papers 2024 and 2025. That evidence identifies a local need for at least 96 hectares of land for industrial and storage / distribution development in the period 2024 to 2042 based on gross completions trends on non-strategic sites in the City over the 2011-24 period.

3.12 In addition to that local need, the 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 as these are expected to continue play an important economic role both sub regionally and nationally.

3.13 Table 5.1 identifies a total employment land supply of 38.77 hectares. There is, therefore, a shortfall of at least 57.23 hectares against the minimum requirement for 96 hectares to meet local needs. The only allocation that is considered potentially suitable for accommodating a unit of 9,000 sqm well related to the strategic road network is JE2.3 Baginton Fields.

3.14 Delivery against the requirement for at least 96 hectares to meet local needs and associated extent of the shortfall will be monitored and reported through the Council's Annual Monitoring Report (AMR). The AMR will record 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. Whilst it will be for those authorities to monitor progress on sites within their own administrative areas, the Coventry AMR will provide an annual update on progress.

3.15 The Employment Land Review (ELR) and Office Market Addendum identify 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. The rest of the need is expected to be met through the approach set out in policy JE4.

3.16 In terms of retail need, 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.

The needs will be met through development in the town centre network set out in Policy R3 and the allocations in Policy R1.

Policy DS1 parts 1 and 2 Overall development needs

AP73 Council to amend the potential modification to policy DS1 to delete part 1 (d) relating to JE2.3 Baginton Fields.
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The amended modification to DS1 part 1 (d) is as follows:

~~d. 25ha to be provided at Baginton Fields, to contribute to sub regional need in Coventry and Warwickshire.~~

Policy DS1 parts 3 and 4

AP74 Council to amend the potential modification to policy DS1 to delete parts 3 and 4 and the final paragraph including parts (a) to (d).

The amended modification is 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.~~

~~Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan Period in the event of one or more of the following circumstances arising:--~~

- ~~a. Through the Duty to Co-operate, the unmet employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;~~
- ~~b. Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed;~~
- ~~c. The monitoring of the Local Plan (in line with the Plan's Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan's objectives and requirements;~~
- ~~d. Any other reasons that render the Plan, or part of it, significantly out of date.~~

Policy DS2

AP75 Council to amend the potential modification to delete policy DS2 and associated reasoned justification in their entirety.

The modification is amended accordingly to delete DS2 and reasoned justification.

~~The Duty to Co-operate~~

~~3.16 The Duty to Co-operate (DtC) is a legal test that requires co-operation between local planning authorities and other public bodies to maximise effectiveness of policies for strategic matters in Local Plans. It was created by the Localism Act 2011. Further details are set out in the Duty to Co-operate Paper~~

~~STRATEGIC POLICY~~

~~Policy DS2: The Duty to Co-operate and partnership working~~

- ~~1. Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.~~
- ~~2. In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met.~~
- ~~3. The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an ongoing basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.~~
- ~~4. Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, Supplementary Planning Documents (SPD) and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.~~
- ~~5. Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.~~
- ~~6. Of particular relevance to parts 4 and 5 of this policy is the continued support for and recognition of the contribution which the following sites make to the sub-regional economy: a. Jaguar Land Rover at Whitley; b. The University of Warwick; c. The wider Coventry Gateway proposals; d. Ansty Park; 19 e. Pro-Logis Park at Keresley; and f. Proposed residential developments to the south of the city's administrative boundary.~~
- ~~7. The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership will continue to work pro-actively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire.~~

Housing Need

AP76 Council to amend the potential modification to paragraph 3.9 to read as follows (or similar):

Through the process of the examination of the Local Plan the Local Housing Need for Coventry for the period 2024-2042 has been determined to be a minimum of 26,046 net additional homes (1,447 per annum). Table 6.1 identifies a housing land supply with capacity for 22,014 net additional homes. In addition, a significant number of new homes are expected to be delivered in the Northern Regeneration Area from the mid 2030s in accordance with policy CC1 part E. The land supply in the Plan is therefore expected to be sufficient to meet needs until the late 2030s. Housing delivery will be monitored and the Plan will be replaced as necessary to ensure that housing needs can continue to be met in the City.

- 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 a minimum of 26,046 net additional homes (1,455 1,447 per annum). Table 6.1 identifies a housing land supply with capacity for 22,014 net additional homes. In addition, a significant number of new homes are expected to be delivered in the Northern Regeneration Area from the mid 2030s in accordance with policy CC1 part E. The land supply in the Plan is therefore expected to be sufficient to meet needs until the late 2030s. Housing delivery will be monitored and the Plan will be replaced as necessary to ensure that housing needs can continue to be met in the City. and this will be delivered fully within Coventry's administrative area through an urban and brownfield-focused strategy of allocations and densification as set out in the Housing chapter of this reviewed plan.

Housing land supply

National policy expects strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period (*NPPF 75*).

The Council's response to PQ5 suggested that an updated version of the trajectory that had been submitted alongside the Plan as Appendix 3 could be included in the Plan either as part of the reasoned justification to policy H2 or as an Appendix (*PS3 November 2025*).

The Council's proposed modification to paragraph 6.11 refers to "the housing trajectory contained in Appendix 3" and summarises the five year requirement and supply based on the responses to AP61 and AP62 and updated trajectory using comprehensive information relating to 1 April 2025 (*PS24 and PS24g 29 May 2026*). The proposed modification to Table 6.1 summarises the housing land supply information for the period 2024 to 2042 based on the same housing trajectory.

AP77 Council to prepare a potential modification to include a housing trajectory in the Plan (either as reasoned justification to policy H2 or as an appendix) based on the comprehensive information relating to 1 April 2025. This should include the first table “Coventry housing trajectory 2024-42” and the bar graph in document PS24g published on 29 May 2026 (but omitting the two tables under the heading “Analysis of supply vs need”).

A modification to update the trajectory is proposed to Appendix 3 of the Plan. The updated version attached at Appendix A to this response and the trajectory is also included at Appendix B to V6 of the Main Modifications Schedule.

Paragraph 6.1

Paragraph 6.1 in the Plan refers to housing completions since 2011 and a housing requirement of 14,200 (which the Council has proposed be amended to 16,800 through a potential modification). This paragraph seems to serve no purpose in terms of providing reasoned justification for policy H1 or any other part of the Plan. Furthermore, it seems to refer to a housing requirement figure that is inconsistent with the requirement set out in policy DS1 (as modified).

AP78 Council to amend the potential modification to delete paragraph 6.1 in the Plan.

The modification is amended to delete paragraph 6.1 as below:

~~6.1 Since 2011, the Authorities Monitoring Reports show strong performance overall of housing delivery against the Local Plan requirement. The 2022/3 monitoring year showed cumulative delivery of 24.6% above the Local Plan requirement of 14,200 at this stage in the projection.~~

Affordable Housing

AP79 Council to amend the potential modification to policy H6 new part 4 to read as follows (or similar):

Major residential developments in the “area applicable to policy H6 part 4” identified on the policies map should include the maximum amount of affordable housing that can be viably delivered including through the use of grant funding where necessary.

Part 4 and policy H6 to be modified as follows:

New residential developments of 10 or more dwellings (gross) or sites of 0.5 hectares (gross) within Use Class C3 in the “area applicable to policy H6 part 4” identified on the policies map should include the maximum amount of affordable

housing that can be viably delivered including through the use of grant funding where necessary.

~~Sites located within the area identified on the policies map identified as 'area applicable to policy H6 part 4' will be expected to demonstrate that grant funding opportunities to support the provision of Affordable Housing are not available prior to agreeing a lower level of provision.~~

Policy GB2: Safeguarded Land in the Green Belt

AP80 Council to check the areas of Safeguarded Land in the Green Belt listed in policy GB2 in relation to proposed allocations in the emerging South Warwickshire Local Plan. In particular, the Council should consider whether or not the Green Belt parcel adjacent to Land South of Stoneleigh Road⁵ should be identified in the list set out.

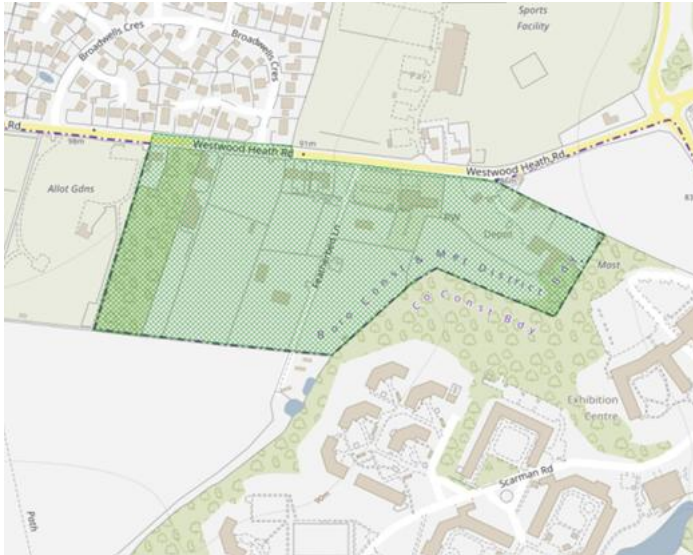
⁵ This land falls within a larger site allocation in the emerging South Warwickshire Local Plan, referred to in representations as site SG01.

In terms of the context to the emerging South Warwickshire Local Plan (SWLP) updates can be found here: <https://www.southwarwickshire.org.uk/swlp/>

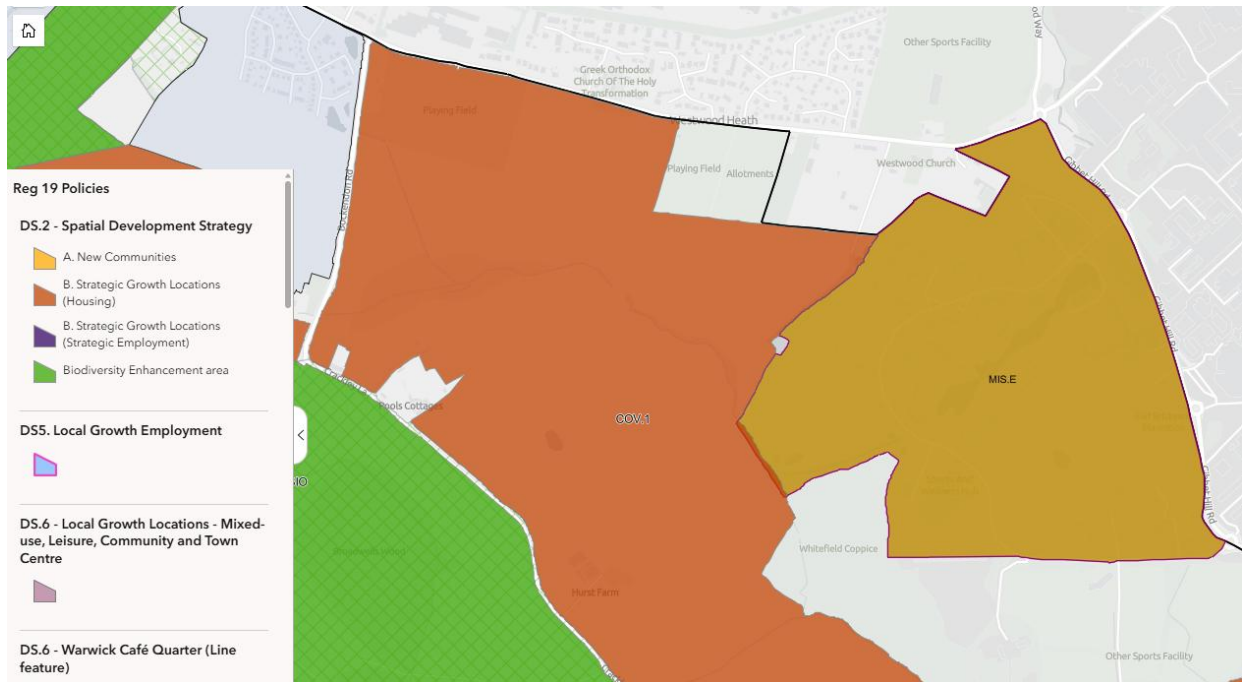
The SWLP website states that at the Joint Cabinet meeting of Stratford-on-Avon and Warwick District Council on Thursday 28 May, members recommended to delay the Regulation 19 consultation so that further work can be undertaken in several key areas. Therefore the context below is based upon the most recent version of the SWLP which is publicly available and which may be subject to further change before consultation on Regulation 19 proceeds.

Appendix 2 of the Green Belt Technical Update (EB35) sets out the Safeguarded Areas in the Green Belt in Coventry.

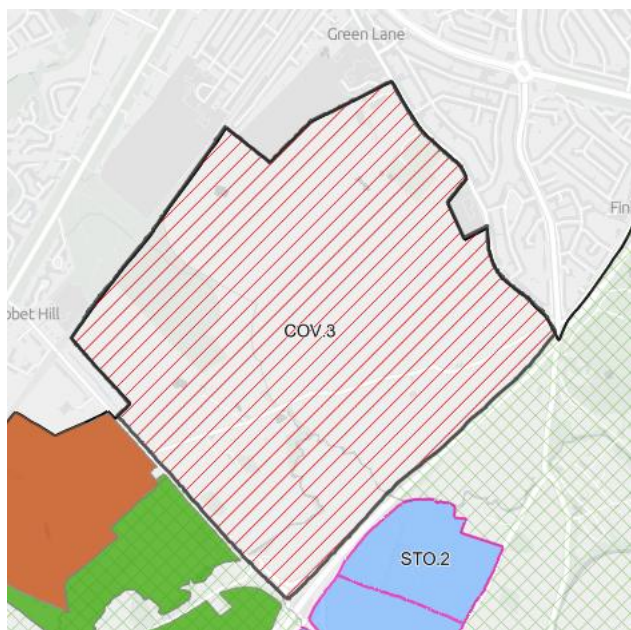
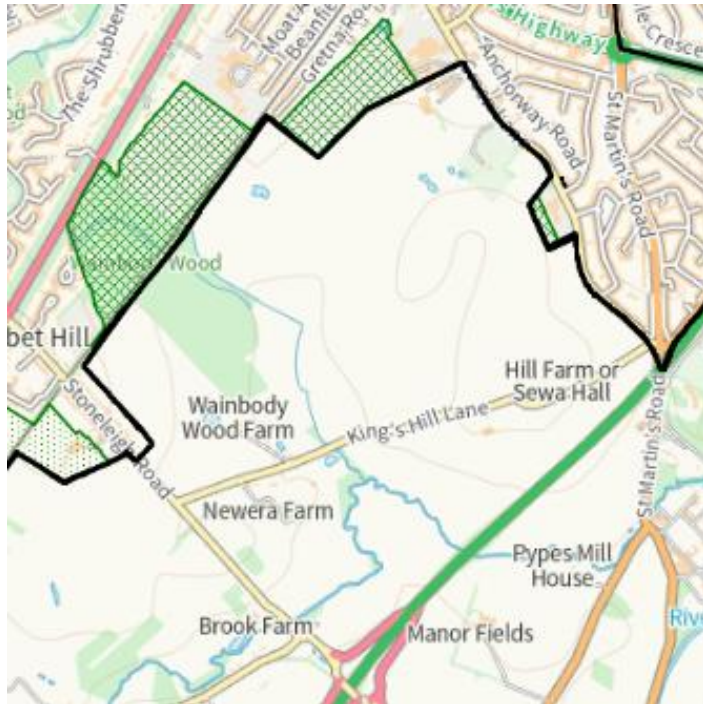
Area 1: land south of Westwood Heath Road is shown below:



This sits adjacent to the University of Warwick campus and to the proposed Strategic Growth Location SG01 in the emerging SWLP as illustrated below

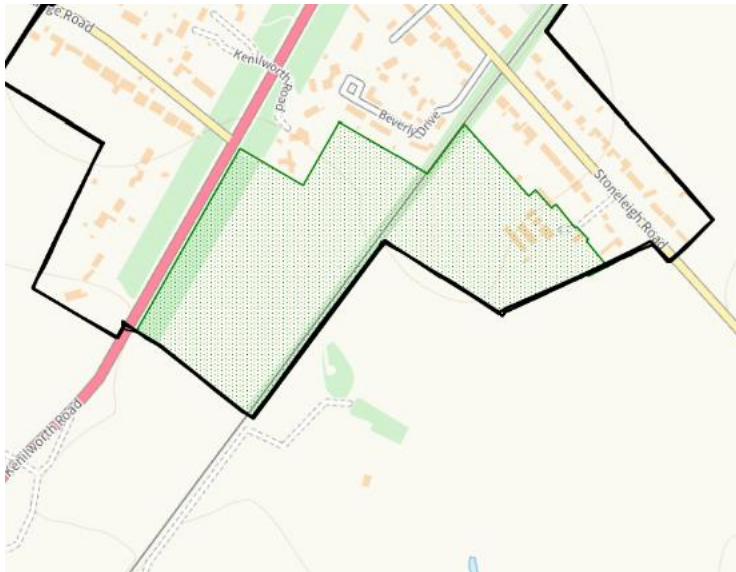


Safeguarded Areas 2, 3 and 4 are all adjacent to the Kings Hill allocated housing site in Warwick District. Each safeguarded area can be seen in detail in EB35 but all are shown below (green cross-hatched) in context to the Coventry Boundary (in black) and in context to the existing residential allocation in Warwick District (as shown on the second map below, the existing allocated site is Cov 3 shown red hatched).

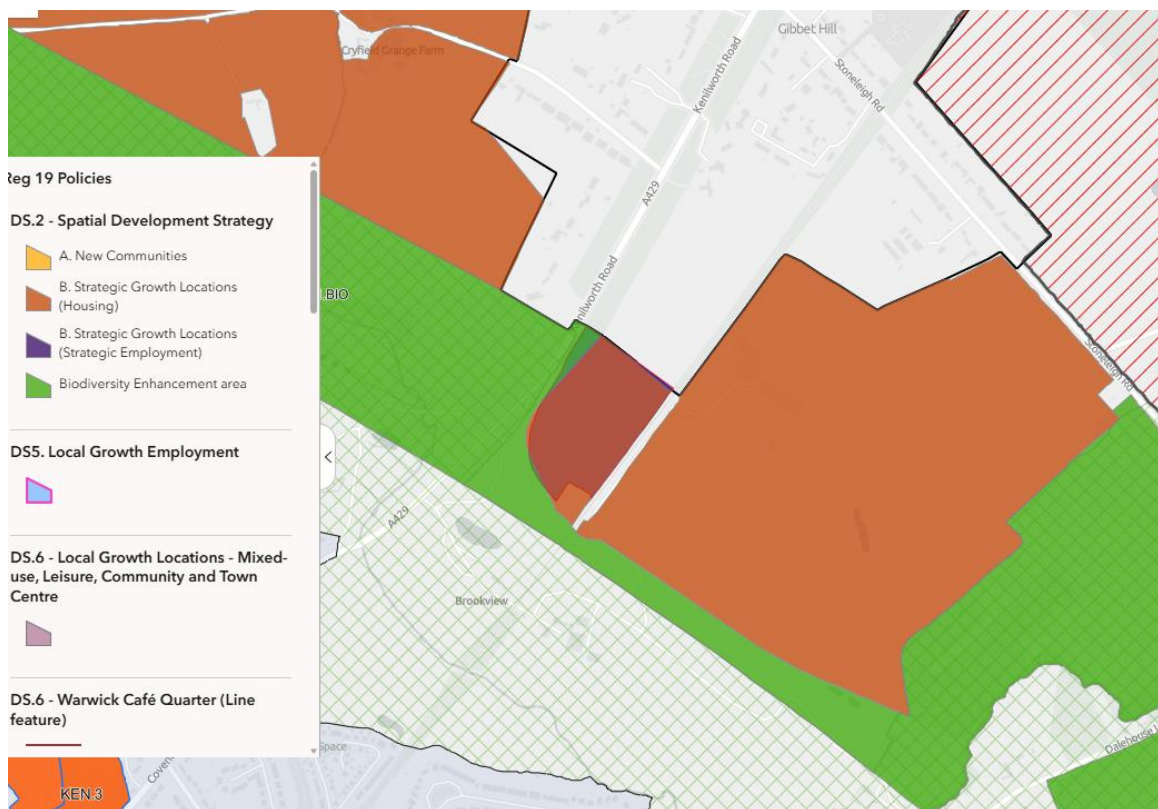


The Kings Hill site was allocated (site H43) through the Warwick District Local Plan, adopted in 2017. Development has not yet started. Outline consent was granted on 24.12.21, reference W/18/0643, for up to 2,500 dwellings, 4,000sq.m of mixed use floorspace, primary school, secondary school, open space and associated infrastructure. Reserved matters are yet to be submitted. The Kings Hill Masterplan and Design Code Masterplan SPD was adopted by WDC on 10th June 2026.

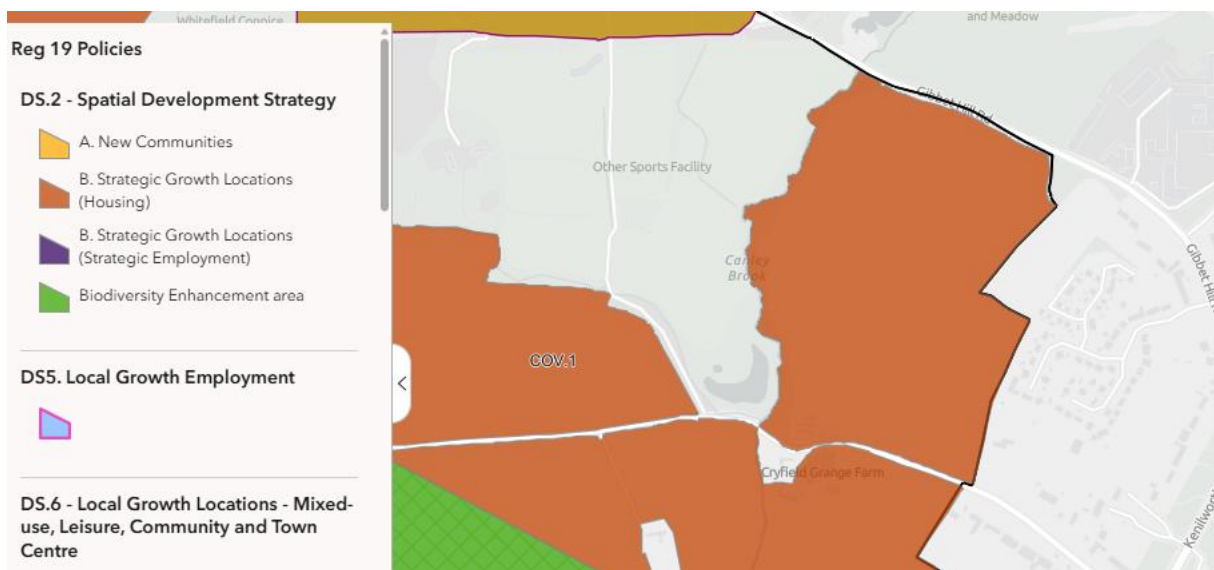
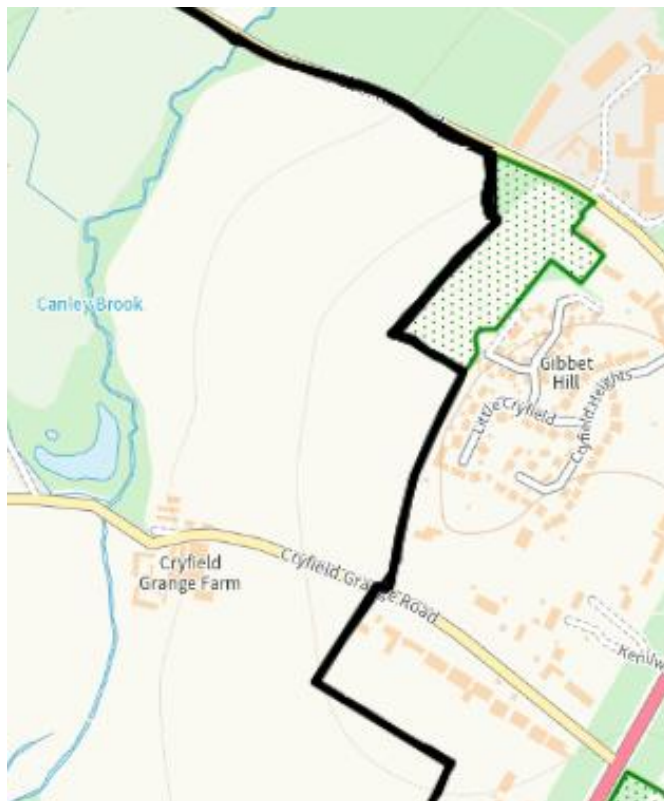
In terms of Land South of Stoneleigh Road referred to in AP80, this is designated Green Belt as shown below (Coventry boundary in black).



It can be seen to sit adjacent to part of the proposed growth area SG01 in the emerging SWLP as illustrated below.



Similarly, there is a parcel of Green Belt to the west of Gibbet Hill which sits adjacent another part of SG01 in the emerging SWLP as shown below.



Neither of these two Green Belt Parcels (land south of Stoneleigh Road and land west of Gibbet Hill) were designated as “Safeguarded Land in the Green Belt” through the 2017 Coventry Local Plan as there was no need. The 2017 adopted Warwick Local Plan designated land adjoining these parcels as Green Belt and therefore the Coventry parcels formed part of a much wider continuous designation.

When the Regulation 19 Local Plan for Coventry was being prepared the SWLP was in the early stages of preparation and it was not considered appropriate to pre-empt further stages of plan making by changing designations along the boundary (and

indeed this remains the case at present with the SWLP Regulation 19 Publication stage awaited). Should the further stages of plan preparation in South Warwickshire result in new allocations for development along the Coventry boundary then the function of these Green Belt parcels south of Stoneleigh Road and West of Gibbet Hill would need to be addressed through a future plan review in Coventry when there is greater clarity in regard to the neighbouring context.

AP81 Council to prepare a potential modification to the relevant part of the reasoned justification to give clarity on the context to safeguarded land and its status. This could involve the deletion of paragraphs 9.3 and 9.4, with the re-wording of subsequent paragraphs as follows (or similar):

Land along the southern boundary of Coventry is designated as safeguarded land in the Green Belt, to allow proper regard to be had to development proposals within Warwick District expected to be brought forward under the emerging South Warwickshire Local Plan.

These sites have been safeguarded as, notwithstanding the national policy expectation that Green Belts should be permanent and that their boundaries should endure beyond the plan period, the designation of these sites as Green Belt is contextually dependent on the development of adjoining land in Warwick District. Such development may mean that some of the Safeguarded Land in the Green Belt will no longer serve Green Belt purposes and may be suitable for residential development.

The Council is committed to working proactively and on an ongoing basis with all relevant partners to enable the delivery of housing where sites are adjacent to or cross administrative boundaries.

A modification is proposed as follows:

~~9.3 The NPPF sets the approach to defining the Green Belt boundaries. Its purpose is to help ensure that the Green Belt (as defined in this Plan) endures beyond the Plan period and that defensible boundaries are maintained.~~

~~9.4 Through the 2017 Local Plan the Council put a mechanism in place that responded to potential longer term development options in Warwick District meaning its own Plan remained flexible and was able to respond to emerging circumstances in neighbouring areas.~~

~~9.5 Land along the southern boundary of Coventry was therefore designated as safeguarded land for consideration as part of the 'next Local Plan review', i.e. the review now taking place. This safeguarding would have explicit regard to development proposals within Warwick District, that if brought forward for development over the course of this Plan period would create Green Belt policy 'islands' which would not meet the five test of Green Belt set out in in the NPPF.~~

~~9.6 In this context, these sites were safeguarded as their long term designation as 'Green Belt' is dependent upon the development of adjoining land in a neighbouring local authority. The sites themselves are largely utilised for a small number of low density homes, education provisions or are undevelopable due to the presence of ancient woodlands.~~

~~9.7 The 2017 Coventry Local Plan stated that should such development proposals not materialise within Warwick District these sites would be considered for a formal return to the Green Belt due to the issues raised above.~~

~~9.8 At the time of writing, proposals are being considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.~~

9.3 Four parcels of land along the southern boundary of Coventry are designated as safeguarded land in the Green Belt. This is to allow proper regard to be had to established allocations and established areas of safeguarded land within Warwick District which have not yet been developed.

9.4 These sites in Coventry have been safeguarded as, notwithstanding the national policy expectation that Green Belts should be permanent and that their boundaries should endure beyond the plan period, the designation of these sites as Green Belt is contextually dependent on the development of adjoining land in Warwick District.

9.5 Such development may mean that some of the Safeguarded Land in the Green Belt will no longer serve Green Belt purposes and may be suitable for residential development.

9.6 The Council is committed to working proactively and on an ongoing basis with all relevant partners to enable the delivery of housing where sites are adjacent to or cross administrative boundaries.

Policy DS4 Part C Keresley SUE Specific Masterplan Principles

AP82 Council to amend the main modification to part i to read “the Council’s Urban Extension Design Guide SPD (2019) and specifically Appendix 1 of the Indicative Keresley Masterplan.”
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Please see our response to AP84. Please note that to avoid confusion, the response to AP84 takes the original submitted policy wording [CD1b] and includes only the latest wording proposed through the examination.

AP83 Council to correct the reference in part ii of the policy shown in the Schedule, so that it only refers to a single local centre, consistent with consultation version of the part, and consistent with the outline planning permission referred to in document CD6.

Please see our response to AP84. The reference to more than one Local Centre was included in error in the versions 4 and 5 of the Main Modifications. For clarity, the policy wording in AP84 is that contained in the Erratum Statement [CD1b] and only the Main Modifications proposed to that wording through the examination are shown.

AP84 Council to reformat the potential main modification to this policy in the Schedule, so that only changes proposed through the examination are shown in strikethrough, underlining or in bold.

The reformatted main modifications are shown below including the changes proposed through AP83 and AP84 above.

Policy DS4 (part C) Keresley SUE Specific Masterplan Principles

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

i) ~~Incorporate the recommendations of the Council's SUE Design Guidance SPD;~~
The Council's Urban Extension Design Guide SPD (2019) and specifically Appendix 1 of the Indicative Keresley Masterplan.

ii) Ensure that the planned Local Centre is in accordance with Policy R1;

iii) Ensure the new defensible boundaries to the Green Belt are clearly supported on the western side of the site to Tamworth Road and to the north around Thompsons Lane;

iv) Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall Brook. This corridor should run north-south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south east; and

v) Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site. This should include:

a. The provision of a new Link Road in accordance with Policy H2. The Link Road should be operational to traffic prior to the full completion of all development components within the SUE;

b. The delivery of the Link Road should not be to the detriment of ProLogis Park; and

c. The management of the existing highway junctions at Bennetts Road, Tamworth Road, Fivefield Road, Sandpits Lane, Thompsons Lane, Long Lane and Watery Lane to ensure they continue to operate in a safe and appropriate way.

Sites of special scientific interest and local wildlife sites

AP85 Council to prepare potential changes to the policies map to designate the sites of special scientific interest and local wildlife sites as referred to in policy GE3.
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The policies map schedule has been updated accordingly.