

Examination of Coventry Local Plan

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IN15 Action points following hearing session 9 June 2026

Introduction

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

The Council should send its written responses to the Programme Officer by **midday on Friday 3 July 2026**

When we have considered the Council's responses to these action points we will publish a further note setting out the next steps in the examination including public consultation on potential main modifications and changes to the policies map.

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).

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.

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.

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.

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.

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.

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).

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.

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).

¹ EB12.

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.

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.

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).

Policy DS2

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

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.

Housing land supply

National policy expects strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period².

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 Appendix³.

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 2025⁴. The proposed modification to

² NPPF 75.

³ PS3 November 2025.

⁴ PS24 and PS24g 29 May 2026.

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”).

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 prepare a potential modification to delete paragraph 6.1 in the Plan.

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.

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.

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

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

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.

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.”

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.

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.

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.

Simon Dean William Fieldhouse

15 June 2026