

Examination of Coventry Local Plan

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IN2: Inspectors' Preliminary Questions to the Council

Introduction

In order to provide clarity and potentially narrow down the focus of the examination, the Council is asked to provide **brief** responses to the following Preliminary Questions about general and procedural matters and the content of the Plan. Where necessary, reference should be made to the main relevant evidence available in the examination library.

If consideration of any of our Preliminary Questions leads the Council to conclude that a main modification is needed to make the Plan sound or legally compliant, please set out suggested revised wording using ~~striketrough~~ and underlined text.

A response from the Council is requested by **midday on Thursday 13 November 2025** (other than for PQ33 and PQ34 for which responses are requested by **midday on Friday 28 November 2025**).

Representors are not being invited to respond to any of the Preliminary Questions at this stage. In due course, when we have considered the Council responses to our Preliminary Questions, we will publish the Matters, Issues and Questions that will be the focus of the examination. Representors will then be able to submit written responses to the Matters, Issues and Questions that are relevant to their regulation 20 representations.

National policy

The National Planning Policy Framework (NPPF) published in December 2024 and revised in February 2025 includes a transitional arrangement¹ that seems to indicate that we should examine the Plan in the context of NPPF published in December 2023. This is because the Plan had been published under regulation 19 before 12 March 2025² and its draft housing requirement (1,455 homes per year) meets at least 80% of local housing need calculated using the standard method in national planning practice guidance published on 12 December 2024 (1,388 homes per year).

¹ NPPF February 234(a) and footnote 83.

² The Plan was published under regulation 19 on 20 January 2025.

PQ1. Does the Council agree that we should examine the Plan under the version of the NPPF published in December 2023 and the Planning Policy Guidance extant at that time for the reason set out above?

Local development scheme

The Council's local development scheme was updated in September 2025³.

PQ2. Was the Plan prepared in accordance with the Council's local development scheme as required by section 19(1) of the 2004 Act?

Public consultation

Section 19(3) of the 2004 Act requires the Council to prepare the local plan in accordance with its statement of community involvement. The Council's statement of community involvement was published in July 2021⁴.

PQ3. Were any concerns raised in representations made under regulation 20 that the consultation carried out during the preparation of the Plan failed to comply with the statement of community involvement or any relevant legal requirements?

Erratum statement

The submission documents include an erratum statement⁵. This advises the Plan published under regulation should have included policy DS4 part C - Keresley SUE Specific Masterplan Principles and that points 2 and 3 in policy R1 relating to New Eastern Green Local Centre should be deleted.

PQ4. Was the erratum statement, outlining those errors, subject to public consultation in accordance with regulation 19?

Appendices to the Plan

The submission documents include Appendices 1 to 9f⁶. It is not clear if these are intended to form part of the Plan. If they are, we would be required to examine whether they are sound and legally compliant.

PQ5. (a) Is it the Council's intention that any, or all, of the Appendices 1 to 9f are part of the local plan as defined in the 2004 Act and 2012 Regulations? (b) If so, please explain for each how it meets the relevant legal definition and is consistent with national policy relating to the content of local plans.

³ CD13.

⁴ CD12.

⁵ CD1b.

⁶ CD1a.

Superseded policies

Paragraph 1.8 in the Plan states that it merges the Local Plan and Coventry City Centre Area Action Plan that were adopted in 2017 into a single document. Paragraph 1.9 refers to various documents that indicate “which policies have changed and why”.

Regulation 8 parts (4) and (5) require that the policies in a local plan must be consistent with the existing adopted development plan - unless the plan being examined contains a policy that is intended to supersede another policy in the adopted development plan and the plan states that fact and identifies the superseded policy.

Appendix 1 lists policies and indicates whether each is updated, unchanged, new or deleted. However, this does not seem to state which policies in adopted plans are superseded and, if so, by which policies in the Plan.

If it is the Council’s intention that the Plan supersedes the two development plan documents adopted in 2017 entirely, that ought to be clearly stated in accordance with regulation 8.

We are required to examine the whole submitted Plan, irrespective of how the policies in it compare to those that they supersede. Our examination of the Plan’s policies will be in the context of national policy relevant now, and the evidence and representations before us (as opposed to what was available and relevant when the 2017 plans were examined).

PQ6. (a) Is it the Council’s intention that the Plan entirely supersedes the Local Plan and Coventry City Centre Area Action Plan that were adopted in 2017? (b) If so, how does the Plan need to be modified to comply with regulation 8?

Duty to cooperate during the preparation of the Plan

The duty to cooperate under section 33A of the 2004 Act applied during the preparation of the Plan up until it was submitted for examination on 9 September 2025 under regulation 22.

The Duty to Cooperate Compliance Statement⁷ provides information about engagement with local planning authorities and prescribed bodies on strategic matters⁸.

⁷ CD9.

⁸ A “strategic matter” is (a) sustainable development or use of land that has or would have a significant impact in at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic [section 33A(4) of the 2004 Act].

The Council's submission letter dated 9 September 2025⁹ describes some work that is still ongoing, including in relation to the duty to cooperate and evidence:

- The final memorandum of understanding and statements of common ground with the HMA and FEMA authorities across Coventry and Warwickshire.
- An Employment Land Recycling Paper which forms part of the ongoing discussions about the employment land shortfall referred to in the memorandum of understanding.
- Statement of Common Ground with Historic England and Heritage Impact Assessments for two site allocations.
- A trajectory explanatory paper.
- An updated transport modelling report as required by National Highways along with a Statement of Common Ground.

PQ7. Could the Council provide an update on how each of the ongoing areas of work are progressing and dates on which they expect each to be submitted to the examination.

PQ8. Have any local planning authorities or other prescribed bodies made representations under regulation 20, or subsequently in discussions about the duty to cooperate statement of common ground, that claim the duty to cooperate has not been complied with?

Climate change

Section 19(1A) of the 2004 Act requires development plan documents (taken as a whole) to include policies designed to secure that the development and use of land in the planning authority's area contributes to the mitigation of, and adaptation to, climate change.

PQ9. Which policies in the Plan are designed to secure that the development and use of land contributes to the mitigation of, and/or adaptation to, climate change?

Strategic priorities

PQ10. Which parts of the Plan identify the Council's strategic priorities for the development and use of land in the Borough as required by section 19(1B) of the 2004 Act?

⁹ CD21.

Equalities

Public authorities are required under section 149 of the Equality Act 2010 to have due regard to the following aims when exercising their functions:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic¹⁰ and persons who do not share it; and
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

An Equality Impact Assessment was carried out during the preparation of the Plan¹¹. This found that all policies in the Plan are likely to have either a positive or neutral impact on the protected characteristics, and no adverse impacts. It states that due regard has been given to the three aims in paragraph 149 of the Equalities Act and that the plan will work to eliminate discrimination by including policies that are inclusive, provide equal opportunity for all and foster good relations between persons where possible within the remits of local planning.

PQ11. Were any concerns raised in representations made under regulation 20 that the Plan is likely to adversely affect persons who share relevant protected characteristics as defined in s149 of the Equality Act 2010 or that the Council failed to have due regard to the Public Sector Equality Duty?

Sustainability appraisal

Local plans should be informed throughout their preparation by a sustainability appraisal that demonstrates how the plan has addressed relevant economic, social and environmental objectives. Significant adverse impacts on these objectives should be avoided and, where possible, alternative options which reduce or eliminate such impacts should be pursued¹².

Local planning authorities are required to consider “reasonable alternatives” during the preparation of local plans, to comply with relevant legislation relating to strategic environmental assessment and to meet one of the tests of soundness¹³. The reasonable alternatives should take account of the objectives and geographical scope of the plan¹⁴.

A sustainability appraisal was carried out during the preparation of the Plan and a report published in September 2024¹⁵.

¹⁰ Age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

¹¹ CD8.

¹² NPPF 32.

¹³ NPPF 35b and The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).

¹⁴ SEA Regulation 12(2).

¹⁵ CD4 and CD4a.

PQ12. Do any representations made under regulation 20 claim that the sustainability appraisal failed to identify reasonable alternatives to the Plan or comply with the relevant legislation for other reasons?

Future review and update to the Plan

Regulation 10A states that local planning authorities must complete a review of a local plan within 5 years of it being adopted. National policy refers to plans being reviewed to assess whether they need updating at least once every five years, and then being updated as necessary¹⁶.

Policy DS1 part 4 refers to the Council undertaking a comprehensive review of certain things to assess whether a full or partial review of the Plan is required. It goes on to say that the Plan will be reviewed prior to the end of the plan period in certain circumstances, but does not refer to the Plan being updated.

PQ13. (a) What is the purpose of policy DS1 part 4 given regulation 10A and national policy? (b) If policy DS1 part 4 needs to be in the Plan, does it need to be modified to clarify when / in what circumstances the Council is intending to review the Plan and update the Plan?

Policy DS2 The duty to cooperate and partnership working

Policy DS2 indicates that the Council will work with neighbouring authorities and other relevant partners on various matters, including to help meet Coventry's development needs that cannot be met in the city (parts 1 and 2), prepare joint strategic evidence (part 3), and in relation to sites that straddle/cross or adjoin administrative boundaries (parts 4, 5 and 6).

However, the Council, other local planning authorities and prescribed bodies are all required under section 33A of the 2004 Act to cooperate with each other in relation to the preparation of local plans, other local development documents (which include supplementary planning documents) and associated activities so far as relating to a strategic matter¹⁷.

PQ13.1 What is the purpose of policy DS2 given the requirements of section 33A of the 2004 Act?

Policies referring to supplementary planning documents and other documents

Various policies in the Plan refer to supplementary planning documents and other documents. Whilst it may be justified to expect applicants to "have regard to" such documents, as they are not development plan documents it is not justified to require proposals to "comply" or be "in accordance" with them (or similar).

¹⁶ NPPF 33.

¹⁷ A "strategic matter" is (a) sustainable development or use of land that has or would have a significant impact in at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic [section 33A(4) of the 2004 Act].

PQ14. Could the Council list all policies in the Plan that refer to a supplementary planning document or other document, and if necessary prepare main modifications to ensure that the requirement relating to each is justified.

DS3 Sustainable development

Policy DS3 parts 2, 3 and 4 relate to the determination of planning applications and seem to be based on paragraph 11 of the NPPF published in December 2023. However, current NPPF policies apply to decision-making, and paragraph 16(f) indicates that local plan policies should avoid duplication of policies in the NPPF. Furthermore, policy DS3 seems to set out materially different tests for considering planning applications than those set out in paragraphs 11c and 11d of NPPF published in February 2025. In particular:

- NPPF 11c refers to an up-to-date development plan, whereas DS3 part 2 simply refers to the Plan.
- DS3 part 3 differs from the first part of NPPF 11d.
- DS3 part 4a differs from NPPF 11d(ii).
- DS3 part 4b differs from NPPF 11d(i).

PQ15. (a) How could policy DS3 be modified to be consistent with national policy?
(b) Why is such a policy needed in the Plan if it duplicates national policy?

Plan period

NPPF 22 states that strategic policies should look ahead over a minimum 15 year period from adoption. The Plan is likely to be adopted between 1 April 2026 and 31 March 2027 meaning that, to be consistent with national policy, strategic policies should look ahead to at least 31 March 2042.

PQ16. Does the Council agree that 15 years from adoption would be 31 March 2042?

PQ17. Why are strategic policies that look ahead from 2021 consistent with national policy that expects plans to be up to date?

Employment land need and supply

The Coventry and Warwickshire HEDNA - West Midlands Strategic Employment Sites Study Alignment Paper (September 2024) ("Employment land alignment paper")¹⁸ identifies:

- A need for 105 ha of land for industrial and warehouse uses on non-strategic sites in Coventry between 2021 and 2041¹⁹.

¹⁸ EB10.

¹⁹ EB10 Table 3.9.

- A need for between 9 ha and 84 ha of land for industrial and warehouse uses on strategic sites²⁰ in the relevant part of the West Midlands that includes Coventry and Rugby (M6 / A45 / A46 / M45) between 2021 and 2045²¹.

Policy DS1 part 1b states that a minimum of 60 ha of employment land will be planned for and provided to meet local needs within the city's administrative boundary. Part 3 states that, as it is not possible to deliver all of the 105 hectares needed in the city boundary, 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. Paragraph 3.14 clarifies that there is a shortfall of 45 ha of land for local employment uses in Coventry.

Policy DS1 part 1c refers to 25 ha to be provided at Baginton Fields to contribute to sub regional need in Coventry and Warwickshire. Policy JE2 includes allocation JE2.4 Baginton Fields (25 ha) for employment development.

The Memorandum of Understanding between Coventry and the Warwickshire local planning authorities²² refers to the local and strategic needs for employment land identified in the employment land alignment paper and indicates a shortfall in supply compared to local needs in all areas other than Nuneaton and Bedworth. The total shortfall in supply against local needs is 248 ha in the period to 2041 and 328 ha in the period to 2045. In addition to local need, a residual need for up to around 300 ha of strategic employment land is identified. There therefore appears to be a shortfall in supply of employment land of over 600 ha in Coventry and Warwickshire.

PQ18. What is the justification for not meeting Coventry's identified need for local employment land (105 ha) in full, and unmet need for strategic employment land in Warwickshire, having regard to NPPF 11b (i) or (ii)?

PQ19. (a) Is policy DS1 part 3 intended to mean that the Council expects neighbouring local planning authorities to allocate sites in their local plans to meet the city's unmet need of around 45 hectares of employment land? (b) If so, which plans and when are they expected to be submitted for examination?

PQ20. Where does the Council expect the need for up to 84 ha of land for strategic sites for industrial and warehouse uses (over 25 ha and suitable for units of over 9,000 sqm) in the Coventry and Rugby (M6 / A45 / A46 / M45) area to be met?

PQ21. (a) What is the purpose of policy DS1 part 1c stating that development of allocation JE2.4 Baginton Fields will contribute to "sub regional" need in Coventry and Warwickshire? (b) How would a decision maker decide if a proposed development on the site would contribute to meeting "local" or "sub regional" needs?

²⁰ EB10 para 1.5: Large scale employment sites typically over 25 ha and largely dedicated to units of over 9,000 sqm.

²¹ EB10 para 4.11: Area 7.

²² CD9 Appendix 4.

Housing need

NPPF 61 states that if there are exceptional circumstances to justify an alternative approach to assessing housing need, the alternative approach should also reflect current and future demographic trends and market signals.

The Plan states that local housing need for Coventry is 1,455 homes per year or 29,100 between 2021 and 2041²³. This is based on the Housing and Economic Development Needs Assessment 2022 (HEDNA) and Review of Coventry's Local Housing Need 2024²⁴. The HEDNA used alternative demographic projections due to inaccuracies in the 2014-based household projections for Coventry. The HEDNA calculates local housing need using the standard method but using the alternative projections²⁵.

In other words, the justification for the HEDNA's alternative approach seems to be that it takes account of demographic trends and market signals by using the standard method (but based on what is considered to be more accurate demographic information).

Table 5.3 in the Housing Need Review updates the HEDNA assessment of need using the 2023 (rather than 2021) affordability ratio to 1,423 homes per year.

National guidance states that local housing need should be kept under review and revised where appropriate. The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities. However, local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination²⁶.

The method provides authorities with an annual number, based on a 10 year base line, which can be applied to the whole plan period. Strategic policies should look ahead over a minimum 15 year period from adoption, although authorities are required to keep their policies under review²⁷.

As the affordability adjustment is applied to take account of under (or over) delivery, there should be no need to take account of the number of homes built in the period before standard method need is calculated from²⁸.

PQ22. Why does the Plan's housing requirement start in 2021 rather than 2022 (the start of the period referred to in the HEDNA)?

²³ Plan 3.9 and 6.10.

²⁴ EB8 and EB2.

²⁵ EB8 5.146.

²⁶ PPG ID: 2a-008-20190220.

²⁷ PPG ID: 2a-012-20190220.

²⁸ PPG ID: 2a-011-20190220.

PQ23. (a) What was local housing need using the HEDNA methodology updated to use the 2025 affordability ratio? (b) Would that provide an appropriate calculation of local housing need from 1 April 2025 (without having to take account of the number of homes built before that date)?

Housing requirement

Local plans should include a housing requirement figure which shows the extent to which their identified housing need (and any unmet needs within neighbouring areas) can be met over the plan period. The requirement may be higher than identified need if, for example, it reflects growth ambitions linked to economic development or infrastructure investment. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes²⁹.

Policy H1 includes a minimum housing requirement of 29,100 additional dwellings between 2021 and 2041.

PQ24. Did the Council, including through sustainability appraisal, consider an increase in the total housing figures in the Plan to (a) help deliver the required number of affordable homes or (b) reflect growth ambitions linked to economic development or infrastructure investment?

Housing supply

Table 6.1 in the Plan summarises the housing supply for the period 2021 to 2041:

• Completions 2021-2024	7,666
• Commitments	13,975
• Remaining allocations (2017 adopted plan)	2,733
• New allocations	3,503
• Other identified sites (HELAA)	816
• Windfalls	2,800
• Total	31,493

Table 6.2 lists “sites allocated for housing” HS2.1 to HS2.38.

PQ25. Which of the categories in Table 6.1 do each of the sites listed in Table 6.2 fall into?

PQ26. (a) What are the “other identified sites (HELAA)”? (b) Why are they not allocated?

The Housing Trajectory August 2025³⁰ includes updated figures compared to Table 6.1:

³⁰ CD16.

• Completions 2021-2025	7,972
• Commitments	13,541
• Remaining allocations (2017 adopted plan)	1,722
• New allocations	4,650
• Other identified sites (HELAA)	428
• Windfalls	2,600
• Total	30,913

PQ27. Why have the figures for remaining and new allocations changed so significantly in the 2025 trajectory compared to Table 6.1 in the Plan?

The 2025 trajectory (row 18) includes a figure of 1,500 for HELAA/SHLAA Northern Regeneration Area.

PQ28. (a) How is the Northern Regeneration Area designated in the Plan and on the policies map? (b) How are the 1,500 homes included, if at all, in Table 6.1 in the Plan – is it included in the total supply of 31,493? (c) How, if at all, is it included in the “simplified table” in the 2025 Trajectory – is it included in the total supply of 30,913?

Allocations and omission sites

The Housing and Economic Land Availability Assessment November 2024 (HELAA) sets out the approach used by the Council to identify and assess potential development sites as part of the process of deciding which sites to allocate in the Plan³¹ in the context of national planning guidance³². The choice of sites to allocate was also informed by the viability assessment³³ and sustainability appraisal³⁴.

The HELAA identified a total of 95 potential development sites: 86 for housing, 3 for employment, and 6 for mixed use or purpose built student accommodation. A total of 51 sites were discounted as being unsuitable and/or unavailable for a variety of reasons, including all of the 28 that are in the Green Belt³⁵. The discounted sites were not considered to be reasonable alternatives for the purpose of the sustainability appraisal. The other (non-discounted) 44 sites are all allocated in the Plan (38 for housing development, some of which as part of a mixed use proposal).

PQ29. (a) Does the Plan allocate every site that the Council considers to be suitable and available for housing development? (b) Do any representations made under regulation 20 suggest that there are sites that are suitable and available which are not allocated? (c) If so, why does the Council consider them not to be?

³¹ EB12.

³² PPG ID: 3 (22 July 2019).

³³ EB22.

³⁴ CD4.

³⁵ EB12 paras 3.70 to 3.73 and Appendix 1 “discounted sites” pages 111-138 and 147-211.

H2.36 Land at Spon End

Table 6.2 in the Plan includes a “total dwellings” figure of 750 for allocation H2.36 land at Spon End. The HELAA refers to the proposal involving the demolition of 450 vacant homes³⁶.

PQ30. How many net additional homes would the proposed development of H2.36 make towards meeting the Plan’s minimum housing requirement?

Five year housing land requirement and supply

National policy expects plans to identify a supply of specific, deliverable sites for five years following the intended date of adoption with an appropriate buffer³⁷.

National guidance extant in December 2023 refers to a buffer of 10% being applied to the five year requirement for the purposes of plan-making, or 20% where the Housing Delivery Test indicates delivery has fallen below 85% of the requirement³⁸. NPPF December 2023 paragraph 77 and footnote 43, and current NPPF, also refer to a 20% if there has been a significant shortfall in delivery

As the Plan is likely to be adopted between 1 April 2026 and 31 March 2027, the relevant five year period is 1 April 2027 to 31 March 2032.

PQ31. Based on the annual requirement for 1,455 homes, what is the five year requirement with an appropriate buffer for the period 1 April 2027 to 31 March 2032?

PQ32. Based on the latest comprehensive housing land supply information³⁹, what is the identified supply of specific, deliverable sites for the period 1 April 2027 to 31 March 2032 in the following categories:

- Sites with detailed planning permission.*
- Sites with outline planning permission for fewer than 10 homes.*
- Sites with outline planning permission for 10 or more homes.**
- Sites with a grant of permission in principle.**
- Allocations in the Plan that do not fall into any of the above categories.**
- Windfalls (if applicable)

* These sites should be considered “deliverable” until permission expires unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer demand for the types of units, or sites have long term phasing plans).

** These sites should only be considered “deliverable” where there is clear evidence that housing completions will begin on site within five years.

³⁶ EB12 page 76.

³⁷ NPPF 69a and 77 and footnote 43.

³⁸ PPG ID: 68-010-20190722.

³⁹ CD16 Housing Supply Trajectory August 2025.

PQ33. Could the Council provide a Table listing all of the sites that are assumed to contribute to the five year supply between 1 April 2027 and 31 March 2032 in each of the above categories with the number of homes expected to be completed on each site in each year of that period.

Housing supply evidence for individual sites

PQ34. Could the Council summarise the housing land supply evidence that informs the latest housing trajectory⁴⁰ using the template attached in the Annex to this note for:

- Every allocation included in the Plan that proposes residential development.
- All sites that are not allocations in the Plan but are assumed to contribute towards the five year supply from 1 April 2027.

Housing delivery

Policy H1 part 2 states that the housing requirement is to be delivered in line with the trajectory set out in Appendix 3. Part 3 states that housing land will be released in order to maintain a continuous 5 year supply of housing land.

PQ35. (a) What is the intended purpose of policy H1 part 2? (b) Is it to set a stepped (up and down) trajectory? (c) If so, what would be the implications for calculating the five year requirement throughout the plan period?

PQ36. (a) What is “housing land will be released” in policy H1 part 3 intended to mean? (b) What land would be “released” and how?

Affordable housing

Policy H6 part 3 requires residential development (excluding purpose built student, co-living and build to rent accommodation) of 10 or more homes or on sites of more than one hectare to provide 25% as affordable homes “in the area identified at Appendix 9c”.

Appendix 9c⁴¹ includes a map showing two areas: one “applicable to policy H6 part 3” and the other “not applicable to policy H6 part 3”:

Appendix 9c: Affordable Housing Policy H6



⁴⁰ CD16.

⁴¹ CD1a page 87.

Policy H6 parts 5, 6 and 7 set out requirements for affordable housing for proposals for purpose built student, co-living and build to rent accommodation.

PQ37. Should the areas defined in Appendix 9c be defined on the policies map to comply with regulation 9⁴²?

PQ38. Are developments of 10 or more homes or on sites of more than one hectare in the pink shaded area on the map in Appendix 9c not required to provide any affordable homes?

PQ39. Is policy H6 part 3 intended to apply to proposals for specialist housing including for older persons (policy H8)?

PQ40. Are the requirements for affordable housing in proposals for purpose built student, co-living and build to rent accommodation intended to apply to all parts of the city?

Gypsy and Traveller Accommodation

National policy expects local planning authorities to use a robust evidence base to establish accommodation needs for travellers to inform the preparation of local plans. Plans should set pitch targets and identify a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against those targets, and identify a supply of specific, developable sites or broad locations for years 6 to 10 and, where possible, for years 11-15⁴³.

The Gypsy and Traveller Accommodation Assessment (March 2023) (GTAA) used the definition of Gypsy and Traveller from the PPTS published in 2015. The definition was updated in revised PPTS published in December 2023, and again in revised PPTS published in December 2024. The definition now includes "persons of nomadic habit of life ... who have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan".

NPPF expects evidence to be up to date. The Procedure Guide for Local Plan Examinations advises that evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older.

PQ41. (a) Is the GTAA sufficiently up-to-date, or is it at risk of having been overtaken by events, given the data which informs it necessarily predates the Assessment? (b) Does the GTAA identify the needs of all households that meet the current PPTS definition, including all other persons with a cultural tradition of nomadism or of living in a caravan?

⁴² Regulation 9 requires the adopted policies map to illustrate geographically the application of policies in the adopted development plan.

⁴³ PPTS paragraphs 7, 9 and 10.

The Plan states that the GTAA identified one private site at Burbages Lane with 5 pitches and a former Council site at Siskin Drive being redeveloped to provide 12 pitches. This is expected to meet the need for 15 pitches between 2022 and 2027. A need for a further 6 pitches by 2041 is identified, which “could potentially be accommodated at Burbages Lane”.

Policy H7 states that provision will be made for at least 6 permanent pitches for Gypsies and Travellers but does not seem to refer to any specific existing or proposed sites.

PQ42. Does the Plan identify a sufficient supply land to meet the identified need for additional accommodation for Gypsies and Travellers comprising:

- specific deliverable sites to meet the identified need for additional pitches between 1 April 2027 and 31 March 2027 (ie five years following adoption)?
- specific, developable sites or broad locations for the remainder of the plan period?

PQ43. Are the existing two sites at Burbages Lane and Siskin Drive defined on the submission policies map?

Student accommodation

PQ44. Should the University of Warwick Campus and Coventry University Campus referred to in policy H10 be defined on the policies map to comply with regulation 9?

Co-living accommodation

PQ45. Is text missing following the colon at the end of policy H13 part g ?

Coventry City Centre

Policies R2 and CC1 (part A) are both entitled “Coventry City Centre – Development Strategy”. They seem to be identical.

PQ46. What is the justification for including both policy R2 and policy CC1 (part A) in the Plan?

Policy CC1 (part B) “Green and Blue Infrastructure” parts (a), (c) and (d) seem to be generic, rather than specific to the city centre, and deal with issues that are covered in greater detail in policies GE1 (green and blue infrastructure), GE2 (green space) and GE4 (trees).

PQ47. What is the justification for including policy CC1 (part B) in the Plan? How would a decision maker be expected to address any inconsistencies between the wording of CC1 (part B) and GE1, GE2 and GE4?

Policy CC1 (part C) “Drainage and Flood Risk” seems to be largely generic, rather than specific to the city centre, and deals with issues that are covered in greater

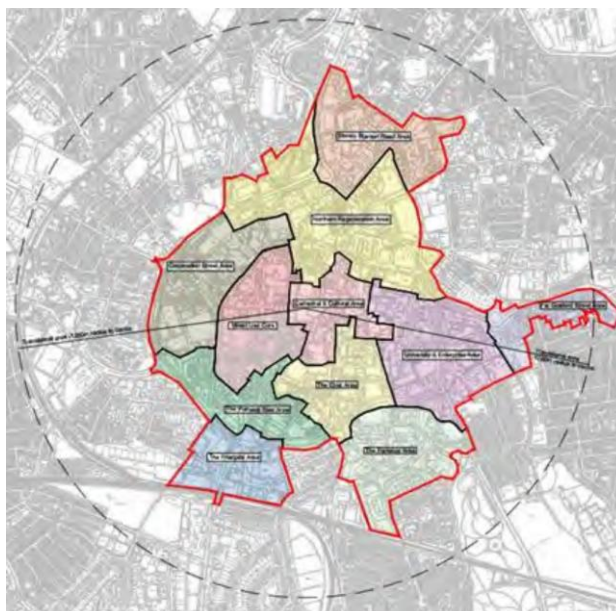
detail in policies EM4 (flood risk management) and EM5 (sustainable drainage systems).

PQ48. What is the justification for including policy CC1 (part C) in the Plan? How would a decision maker be expected to address any inconsistencies between the wording of CC1 (part C) and EM4 and EM5?

Policy CC1 (part D) “Environmental Management” seems to be generic, rather than specific to the city centre, and deals with issues that are covered in greater detail in various EM policies.

PQ49. What is the justification for including policy CC1 (part D) in the Plan? How would a decision maker be expected to address any inconsistencies between the wording of CC1 (part D) and EM policies?

Policy CC1 part E relates to various distinct “city centre character areas” which are indicated on a map in Appendix 9(f).



PQ50. Should the city centre character areas referred to in policy CC1 (part E) be defined on the policies map to comply with regulation 9?

Out-of-centre proposals for main town centre uses

Policy R4 part 2 requires a “sequential assessment” for all main town centre use proposals or any other use within use class E and F outside defined centres. National policy and guidance refer to a “sequential test” for main town centre uses outside centres.

PQ51. (a) What specific uses in class E and F are not included in the NPPF definition of main town centre use? (b) What is the justification for requiring a “sequential assessment” for such uses? (c) Is a “sequential assessment” intended to be the same as a “sequential test”?

Policy R4 part 3 requires an “impact test” for all retail and other main town centre use proposals outside defined centres over certain size thresholds. National policy and guidance refer to an “impact assessment” for retail and leisure developments outside town centres, not for other types of main town centre uses.

PQ52. (a) What specific main town centre uses is policy R4 part 3 intended to apply to in addition to retail and leisure? (b) What is the justification for requiring “impact tests” for such uses? (c) Are “impact tests” intended to be the same as “impact assessments”?

Green Belt and safeguarded land

Policy GB1 states that the city’s Green Belt boundaries are defined on the policies map.

PQ53. Have any of the Green Belt boundaries defined on the policies map adopted in 2017 been altered on the submission policies map?

Policy GB2 is entitled “Safeguarded land in the Green Belt” and lists 4 sites.

The policies map indicates areas of “Safeguarded Green Belt”.

PQ54. Are the 4 sites listed in GB2 and designated on the policies map in the Green Belt (a) in the adopted plan and (b) in the submitted Plan?

Local Green Space

Policy GB3 states that Local Green Space boundaries are identified on the policies map.

PQ55. Could the Council provide a list of the areas of Local Green Space designated on the policies map and specify the available evidence that demonstrates that each meet the criteria in NPPF 105 and 106:

- Identified by the community as being of particular importance to them.
- Consistent with planning for sustainable development.
- Complement investment in sufficient homes, jobs and other essential services.
- Reasonably close proximity to the community it serves.
- Demonstrably special to a local community and holds particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.
- Local in character and not an extensive tract of land.

Minerals and waste

Policies EM8 and EM9 relate to waste management and safeguarding minerals resources.

PQ56. Is there an adopted minerals and waste plan for the City?

The reasoned justification to policy EM9 refers to Mineral Consultation Areas which are designated across the Coventry, Solihull and Warwickshire authority areas having regard to the British Geological Society's Mineral Safeguarding Project.

PQ57. Please provide a copy of the report, or evidence from the British Geological Society's Mineral Safeguarding Project which has informed this approach in the policy.

Simon Dean William Fieldhouse

27 October 2025

Local plans: housing land supply

Introduction

This note includes a template for local planning authorities to use to provide information about the housing land supply assumed in a local plan in the context of relevant national policy and guidance.

NPPF (December 2023)

NPPF 69 states that planning policies should identify a supply of:

- a) specific, **deliverable** sites for five years following the intended date of adoption; and
- b) specific, **developable** sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

“Intended date of adoption”

It will be important to be clear what the intended date of adoption is, as this will determine the period from which years 1-5, 6-10 and 11-15 are measured in the context of NPPF 69. In most cases it is likely to start no earlier than the next 1 April at least one year following submission of the plan for examination. For example, if a plan is submitted in September 2025, the five years following adoption would start no earlier than 1 April 2027 (assuming a one year examination). This should be agreed with the examining Inspector.

Developable sites

To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

PPG ID: 68-020-20190722 advises that in demonstrating that there is a reasonable prospect, plan-makers can use evidence such as (but not exclusively):

- written commitment or agreement that relevant funding is likely to come forward within the timescale indicated, such as an award of grant funding;
- written evidence of agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;
- likely buildout rates based on sites with similar characteristics; and
- current planning status - for example, a larger scale site with only outline permission where there is supporting evidence that the site is suitable and available, may indicate development could be completed within the next 6-10 years.

Deliverable sites

To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units, or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

For sites that fall within the definition in (b) above, PPG ID: 68-007-20190722 advises that clear evidence may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

Template

The attached template should be completed for every allocation included in the plan that proposes residential development.

A template should also be completed for any sites that are not allocations in the plan but are assumed to contribute towards the five year supply following the intended date of adoption.

Relevant evidence as referred to above should be summarised succinctly for each site. This should be proportionate to whether the site is considered “deliverable” or “developable”.

Start dates and build out rates should be realistic, having regard to developer intentions but also evidence relating to the timing of development on similar sites in the district and elsewhere in the country.

Local plan housing land supply template

Local plan allocation ref	
Site name	
Total capacity (dwellings)	
Total completions in plan period	
Total completions in five years following adoption	

Plan period up to adoption				Years following adoption														
-2	-1	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
Annual completions																		

Ownership and availability	
Developer interest	
Site assessment work	
Viability	
Infrastructure provision	
Planning permission	
Progress towards applications, reserved matters,	

discharge of conditions, etc.	
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