



Examination of Coventry Local Plan

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IN3: Inspectors' matters, issues and questions; written statements; and hearings programme

Introduction

This note sets out:

- The matters, issues and questions that will be the focus of the examination (**Annex 3**).
- Advice about, and deadlines for, submitting written statements in response to the matters, issues and questions (**Annex 1**).
- A draft programme for the hearing sessions (**Annex 2**).
- A deadline of **midday on Thursday 5 February 2026** to inform the Programme Officer if you wish to participate at one or more of the hearing sessions.

Council's responses to Preliminary Questions

We published Preliminary Questions to the Council on 27 and 29 October and 21 November 2025¹. The Council's responses were published on various dates between 14 November and 11 December 2025². Some of those responses proposed main modifications to the Plan and changes to the submitted policies map all of which are set out in schedules published in January 2026³. Where relevant, we refer to the Council's responses to our Preliminary Questions and proposed main modifications and changes to the policies map in our matters, issues and questions.

Matters, issues and questions

Our matters, issues and questions, which will be the focus of the examination, are set out in **Annex 3** to this note.

¹ IN2, IN2.1 and IN2.2.

² PS3 and PS4 (14 November 2025); PS9, PS10 and PS10a (28 November 2025); PS11 and PS11a (3 December 2025); and PS12 and PS12a to PS12d (11 December 2025).

³ PM1.1 (15 January 2026) and PM2 (8 January 2026)

Written statements

The Council should produce a short statement for each matter in Annex 3.

Any representor may submit statements answering questions that relate to their original representations. Statements should set out the key points from the original representation against the relevant questions.

Written statements (MS Word or PDF) must be emailed to the Programme Officer by the following deadlines:

- Midday on **Thursday 26 February** – statements for **matters 1 to 3**.
- Midday on **Thursday 5 March** – statements for **matters 4 to 13**.

Information about the format, content and length of written statements is set out in **Annex 1**. We may not consider statements that do not follow the advice in Annex 1.

Hearings programme

The examination hearing sessions will be held at:

- Coventry City Council, One Friargate, Station Square, Coventry, CV1 2FL

and are provisionally programmed to take place over a total of 9 sitting days in the following weeks

- **w/c 23 March 2026**
- **w/c 13 April 2026**
- **w/c 27 April 2026**

Hearing sessions will be held on Tuesdays, Wednesdays and Thursdays and start at **09.30**.

A provisional hearings programme is set out in **Annex 2**. We will review this when we have read the written statements and considered the request to participate in the hearings (see below); any changes will be announced on the examination website.

Participating in the hearings

If you made a representation under regulation 20 seeking to change a relevant part of the Plan and wish to participate at the hearing session when that issue is being considered you should inform the Programme Officer by **midday on Thursday 5 February 2026**. When responding, please specify which matter(s) and issue(s) that you wish to participate in.

If you do not respond by that time, we will assume that you do not wish to participate, irrespective of what you may have indicated in your regulation 20 representation.

Further information

Further information about the examination procedures is set out in our Guidance Note published on 10 October 2025⁴. Any queries about the examination should be taken up with the Programme Officer.

Simon Dean William Fieldhouse

16 January 2026

⁴ IN1.

Written statements

The Council should produce a statement for every matter in Annex 3. Any representor may submit statements answering questions that relate to their original representations. Statements should set out the key points from the original representation against the relevant questions.

Length of statements

All statements should be concise and focussed on the questions, and in any event must contain no more than **3,000 words** for each matter.

Because the Council should answer every question, it may in some cases be necessary to exceed the limit of 3,000 words per matter. However, the Council's statements need not repeat the answers it has provided to our Preliminary Questions. Rather, they should refer to specific parts of the Plan's reasoned justification if that adequately answers the question, and/or briefly summarise relevant parts of an evidence document.

Artificial intelligence

If you use artificial intelligence (AI) to create or alter any part of your statement you should make this clear and follow the Planning Inspectorate's guidance

<https://www.gov.uk/guidance/use-of-artificial-intelligence-in-casework-evidence>

Evidence

Written statements are not the opportunity to introduce new evidence. Rather, they should refer to relevant evidence on the examination website including that which was submitted with representations made under regulation 20. Reference should be made to particular parts of that evidence (with document title, reference number and page and paragraph numbers), with a clear explanation of how it relates to my question.

Where appropriate, reference should be made to relevant parts of the National Planning Policy Framework published in December 2023 ("NPPF")⁵ (paragraph numbers) and associated Planning Practice Guidance ("PPG") (eg ID: 61-001-20190315) with an explanation of why you think the policy in question is consistent or inconsistent with it. However, there is no need to quote extensive parts of the NPPF or PPG.

If the Council or any representor considers that there is evidence that it is essential to refer to in order to answer one of our questions, but which is not on the examination website, please check with the Programme Officer before submitting it. We will consider any such request having regard to the relevance of the evidence and the reason why it had not been submitted earlier. If we decide to accept it, it will be published in the examination library.

⁵ The transitional arrangements in paragraphs 234 to 236 of the NPPF published in December 2024 and amended in February 2025 mean that we are examining the Plan in the context of the version of the NPPF published in December 2023 and associated planning policy guidance extant on that date.

Modifications to the Plan

If your response to one of our questions concludes that the relevant part of the Plan is not sound, please set out how you think it should be modified to ensure that it is.

Submitting statements

All statements must include your name and representor reference number in the top right corner of each page. They must be in MS Word or native PDF format and emailed to the Programme Officer by the following deadlines:

- Midday on **Thursday 26 February** – statements for **matters 1 to 3**.
- Midday on **Thursday 5 March** – statements for **matters 4 to 13**.

Written statements will be published on the examination website as soon as possible after the deadline so that they are available to all participants and anyone else who wishes to read them. Because they will be available in this way, they will not be posted or emailed directly to participants. Anyone who is unable to access them on the website should contact the Programme Officer.

Once the date for submitting written statements has passed, no other written evidence should be submitted, unless we specifically request it.

Further information

Any queries about how to prepare or submit written statements should be taken up with the Programme Officer.

End of Annex 1

Provisional hearings programme

Week One

M1. Legal, procedural and other general matters [1 day]

- National planning policy
- Maintaining effective cooperation during plan preparation
- Public consultation
- Equalities
- Sustainability appraisal
- Superseded policies in adopted plans
- Appendices 1 to 9f
- Policies referring to SPD and other documents
- Future review and update to the Plan (DS1 part 4)
- Future cooperation and partnership working (DS2)
- Sustainable development policy (DS3)
- Transport evidence and impacts on the road network
- Developer contributions for infrastructure (IM1)
- Viability

M2. Amount of development required in the plan period [1 day]

- Plan period
- Housing need and requirement (DS1 part 1a and H1 part 1)
- Industrial and warehouse land requirements (DS1 parts 1b, 1c and 3)
- Office floorspace requirements (DS1 part 2)

M3. Housing allocations [1 day]

- Site selection methodology
- H2 Table 6.2 Allocations
- HS2.1 to HS2.38 and DS4C and DS4D

Week Two

M4. Housing land supply [1 day]

- Supply for five years following adoption
- Supply for remainder of plan period
- H1 parts 2 and 3

M5. Housing development management policies [1 day]

- H3 Provision of new housing
- H4 Securing a mix of housing
- H9 Residential density
- H6 Affordable housing
- H10 Student accommodation
- H12 Build to rent accommodation
- H13 Co-living accommodation
- H8 Specialist housing including for older persons
- H5 Managing existing housing stock
- H7 Gypsy and Traveller accommodation

M6. Economic development and employment land [0.5 day]

- JE1 Overall economy and employment strategy
- JE2 parts 4 and 5 Key Employment Sites
- JE3 Non-employment uses on employment land
- JE5 Industrial and storage/distribution development
- JE8 Location of research and development
- JE2 Employment and mixed use allocations
- Overall industrial and warehouse land supply (Table 5.1)
- Coventry's unmet need for industrial and warehouse land
- Employment land windfalls
- JE4 Location and type of office development
- Overall office land supply (Table 5.2)
- JE6 Tourism and visitor-related development
- JE7 Accessibility to employment opportunities

M7. Retail, town centres and Coventry city centre [0.5 day]

- Need for additional retail floorspace
- R3 Town centre network
- R1 New district and local centres
- R3, R5 and R6 Development within town centres
- R4 Out of centre proposals
- R2 and CC1A to CC1E Coventry city centre

Week Three

M8. Communities and health and wellbeing [0.25 day]

- HW1 Health and Health Impact Assessments (HIA)
- CO1 New or improved social, community and leisure premises
- CO2 Re-use or Redevelopment of Facilities
- CO3 Neighbourhood and Community Planning

M9. Green Belt and green environment [0.5 day]

- GB1 Green Belt
- GB2 Safeguarded Land in the Green Belt
- GB3 Local Green Space
- GE1 Green and Blue Infrastructure
- GE2 Green Space
- GE3 Biodiversity, Geological and Landscape Conservation
- GE4 Tree Protection

M10. Design and masterplanning [0.25 day]

- DE1 Ensuring High Quality Design
- DE2 Delivering High Quality Places
- DS4 (Part A) General Masterplan principles

M11. Heritage [0.25 day]

- HE1 Conservation Areas
- HE2 Conservation and Heritage Assets
- HE3 Heritage Park – Charterhouse
- HE4 Archaeology

M12. Accessibility [0.25 day]

- AC1 Accessible Transport Network
- AC2 Road Network
- AC3 Demand Management
- AC4 Active Transport Provision including Walking, Cycling and Micro Mobility
- AC5 Bus, Demand Response Transit and Rapid Transit
- AC6 Rail
- AC7 Freight

M13. Environmental management [0.5 day]

- EM1 Planning for Climate Change Adaptation
- EM4 Flood Risk Management
- EM5 Sustainable Drainage Systems (SuDS)

- EM6 Redevelopment of Previously Developed Land
- EM7 Air Quality
- EM11 Energy Infrastructure
- EM12 Reducing operational carbon in new build non-residential development
- EM13 Overheating in new buildings
- EM14 Embodied carbon and waste
- EM15 Noise
- EM8 Waste Management
- EM9 Safeguarding Mineral Resources
- EM10 Non Mineral Development in Mineral Safeguarding Areas

M14. Other soundness and legal compliance issues [0.25 day]

Next steps in the examination

End of Annex 2

Matters, Issues and Questions

We will consider the following matters, issues and questions to help decide if the Plan is sound and legally compliant and, if not, how it could be modified to ensure that it is.

We published Preliminary Questions to the Council on 27 and 29 October and 21 November 2025⁶. The Council's responses were published on various dates between 14 November and 11 December 2025⁷. Some of those responses proposed main modifications to the Plan and changes to the submitted policies map all of which are set out in schedules published in January 2026⁸.

Where relevant, we refer to the Council's responses to our Preliminary Questions and proposed main modifications and changes to the policies map in our matters, issues and questions.

M1. Legal and procedural requirements and other general matters

National policy

The National Planning Policy Framework (NPPF) published in December 2024 and revised in February 2025 includes a transitional arrangement⁹ 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 2025¹⁰ 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).

The Council's response to PQ1 advises that they agree with the above.

Q1.1 Do the transitional arrangements in current NPPF (February 2025) indicate that we should examine the Plan in the context of NPPF published in December 2023?

Maintaining effective cooperation during plan preparation

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.

⁶ IN2, IN2.1 and IN2.2.

⁷ PS3 and PS4 (14 November); PS9, PS10 and PS10a (28 November); PS11 and PS11a (3 December); and PS12 and PS12a to PS12d (11 December).

⁸ PM1.1 [15 January] and PM2 [8 January].

⁹ NPPF February 234(a) and footnote 83.

¹⁰ The Plan was published under regulation 19 on 20 January 2025.

The Council's Duty to Cooperate Compliance Statement¹¹ provides information about engagement with local planning authorities and prescribed bodies on strategic matters¹².

The Council's response to PQ8 advises that Nuneaton and Bedworth Borough Council's regulation 19 representation stated that the Duty to Co-operate had not been complied with but this objection has since been overcome as set out in the Statement of Common Ground dated August 2025 (CD20).

The Council's letter dated 9 September 2025¹³ describes some work that was still ongoing when the Plan was submitted for examination, including in relation to the duty to cooperate and evidence¹⁴. The Council's response to PQ7 (14 November 2025)¹⁵ provided an update on that ongoing work, and a number of documents have been subsequently added to the examination library. We will consider those as part of our assessment of soundness under subsequent matters.

On 27 November 2025, in a Written Ministerial Statement and letter to the Planning Inspectorate, the Government advised that forthcoming Regulations under the Levelling Up and Regeneration Act 2023 will have the effect of abolishing the duty to cooperate for the existing plan-making system, including for local plans that are at examination. Those Regulations are expected to be published early in 2026 meaning that we do not expect that it will be part of our role to consider whether or not the Council complied with the duty to cooperate during the preparation of the Plan.

Notwithstanding that, the Government expects us to continue to examine plans in line with the policies in the NPPF on maintaining effective co-operation¹⁶. We will therefore consider whether the Council has maintained effective cooperation with relevant local planning authorities and other bodies as part of our assessment of soundness under subsequent matters and issues

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 2021¹⁷.

The Council's response to PQ3 advises that no concerns were 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

¹¹ CD9.

¹² 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].

¹³ CD21.

¹⁴ Housing and employment land requirements and supply across Coventry and Warwickshire; heritage impact assessments for two allocations; and transport modelling including on strategic road network.

¹⁵ PS3.

¹⁶ <https://questions-statements.parliament.uk/written-statements/detail/2025-11-27/hcws1104>

https://assets.publishing.service.gov.uk/media/69286415345e31ab14ecf67d/Local_Plans_letter_to_PINS.pdf

¹⁷ CD12.

The submission documents include an erratum statement¹⁸. This advises that 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.

The Council's response to PQ4 advises that the erratum statement was subject to public consultation in accordance with regulation 19.

Q1.2 Was the consultation carried out by the Council during the preparation of the Plan in compliance with the statement of community involvement and relevant legal requirements?

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 characteristic¹⁹ 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 Plan²⁰. 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.

The Council's response to PQ11 advises that no concerns were 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.

Q1.3 Is there any substantive evidence to indicate that the requirements of section 149 of the Equality Act 2010 have not been met?

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

¹⁸ CD1b.

¹⁹ Age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

²⁰ CD8.

avoided and, where possible, alternative options which reduce or eliminate such impacts should be pursued²¹.

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 soundness²². The reasonable alternatives should take account of the objectives and geographical scope of the plan²³.

A sustainability appraisal was carried out during the preparation of the Plan and a report published in September 2024²⁴. The appraisal considers various reasonable alternatives including in relation to the amount of housing, density of housing, amount of employment land, amount and distribution of office development, location of purpose built student accommodation, energy standards, development in the Green Belt, and site allocations²⁵.

The appraisal includes a statement of compliance with the SEA Directive and Regulations²⁶.

The Council's response to PQ12 advises that no representations made under regulation 20 claim that the sustainability appraisal failed comply with the relevant legislation. The response identifies a number of representations that commented on the sustainability appraisal including in relation to reasonable alternatives.

Where relevant, we will consider the findings of the sustainability appraisal as part of our assessment of soundness under subsequent matters.

Q1.4 Is there any substantive evidence to indicate that the sustainability appraisal fails to meet relevant legal requirements?

Superseded policies in adopted plans

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 to the Plan 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.

²¹ NPPF 32.

²² NPPF 35b and The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).

²³ SEA Regulation 12(2).

²⁴ CD4 and CD4a.

²⁵ CD4 Non-Technical Summary paragraphs 14 to 28 and section 4.

²⁶ CD4a Appendix I.

The Council's response to PQ6 confirms that it is the Council's intention that the Plan entirely supersedes the Local Plan and Coventry City Centre Area Action Plan that were adopted in 2017. The response proposes modifications to paragraph 1.8 in the Plan and Appendix 1 intended to clarify that ensure compliance with regulation 8.

We are therefore required to examine the whole submitted Plan, irrespective of how similar or different the policies in it are to those in the previously adopted plans that they supersede. Whilst the 2017 examining Inspector's report may be relevant to our assessment of soundness, our examination of the Plan 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).

Q1.5 Would the Council's proposed modifications to paragraph 1.8 in the Plan and Appendix ensure compliance with regulation 8?

Appendices 2 to 9f

The Council's response to PQ5 advises which of Appendices 2 to 9f²⁷ the Council intends to be part of the Plan:

- 2. Marketing guidance – could be included as part of the reasoned justification for policies JE3 and C02.
- 3. Housing trajectory – a modified version could be included in the reasoned justification for policy H2 along with a summary of the overall land supply and 5 year supply at adoption.
- 4. Ancient woodlands – the list of woodlands could be included in the reasoned justification for policy GE3, and the policies map modified to designate the sites as required by regulation 9.
- 8. Monitoring framework – to be included as an Appendix in the Plan.

Appendices 5 (heritage park and route map), 6 (cycle and parking standards), 7 (Infrastructure Delivery Plan) and 9 (designations and allocation maps) are not intended to be part of the Plan. The policies map needs to be modified where necessary to include appropriate designations.

The Council's response to SPQ5 proposes a number of modifications to the Plan and changes to the Policies Map to reflect the above. We will consider those as part of our assessment of subsequent matters and issues.

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.

The Council's response to PQ9 identifies 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.

²⁷ CD1a.

We will consider the soundness of those policies under subsequent matters and issues.

Strategic priorities

Local planning authorities are required to identify the strategic priorities for the development and use of land in their area and include policies in their local plans to address those priorities²⁸.

The Council's response to SPQ10 advises that the Council's strategic priorities are set out in Table 2.1 in chapter 2 of the Plan which also sets out which policies address those priorities. We will consider the soundness of those policies, including if necessary how they address the strategic priorities, under subsequent matters and issues.

Policies referring to SPD 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).

The Council's response to PQ14 (Appendix B) lists all policies in the Plan that refer to a supplementary planning document or other document and proposes various main modifications intended to ensure that the policy requirement relating to each is justified.

Q1.6 Are the modifications proposed in the Council's response to PQ14 (Appendix B) and set out PM2 necessary to make the Plan sound and would they be effective in that regard?

Future review and update to the Plan (DS1 part 4)

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 necessary²⁹.

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.

The Council's response to PQ13 proposes a modification to policy DS1 part 4 intended to clarify its approach to reviewing the Plan in the future. However, neither the submitted version of policy DS1 nor the modification refer to the Plan being "updated".

Q1.7 Is policy DS1 part 4 consistent with national policy and does it provide an effective framework for a future review of, and update to, the Plan? If not, would the Council's proposed main modification make the policy sound?

²⁸ Section 19 (1B) and (1C) of the 2004 Act.

²⁹ NPPF 33.

Future cooperation and partnership working (DS2)

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 duty to cooperate will not apply to local plans prepared under the Levelling Up and Regeneration Act 2023 and, as referred to in relation to Q1.2 above, the duty is not expected to apply to this Plan when LURA Regulations are published early in 2026.

Notwithstanding that, current national policy requires effective co-operation during plan-making and the Government has indicated that requirement will continue for plans prepared under the LURA³⁰.

The Council's response to PQ13.1 states that policy DS2 is included in the Plan because it sets out local priorities and commitments for future cooperation and partnership working.

Q1.8 (a) Does policy DS2 serve a clear purpose and avoid duplication of national policy?
(b) If so, does it need to be modified to delete reference to the duty to cooperate?
(c) Subject to that, would it provide an effective framework for future cooperation and partnership working?
(d) In particular, is it clear whether it is intended to set out the Council's expectations for how the City's development needs will be met elsewhere in the wider sub region, and/or how the Council intends to address certain strategic matters in a future replacement Plan for the City?

Sustainable development policy (DS3)

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).

The Council's response to PQ15 proposes that the Plan be modified to delete policy DS3 to avoid duplication of national policy, and to include references to the Council's corporate objectives in the "supporting text". However, chapter 2 of the Plan already refers to the Council's corporate objectives so it is not clear why a such a main modification is required.

³⁰https://assets.publishing.service.gov.uk/media/6941965758a21370f58f304e/Draft_NPPF_December_2025.pdf.

Q1.9 Is policy DS3 inconsistent with national policy? If so, would its deletion be effective in making the Plan sound?

Transport evidence and impacts on the road network

National policy advises that development should only be prevented if it would have an unacceptable impact on highway safety or the residual cumulative impacts on the strategic road network would be severe. Local plans should ensure that any significant impacts from development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to any acceptable degree³¹.

Policy AC2 requires development proposals ... to mitigate and manage traffic growth to ensure that they do not cause unacceptable levels of traffic congestion, highway safety problems and poor air quality ... focussing firstly on demand management measures (policy AC3) ... and secondly on the delivery of appropriate highway capacity interventions. Policy IM1 sets out requirements for developer contributions for infrastructure with reference to the Infrastructure Delivery Plan.

The Infrastructure Delivery Plan states that transport infrastructure is the largest area of infrastructure needed in terms of scale and cost. The transport modelling that has supported the Local Plan has identified a range of schemes that will be essential to the delivery of new homes and jobs across Coventry³². Section 12 lists various transport infrastructure projects along with estimated costs and timescales for delivery

The Council's transport evidence includes a Transport Background Paper (November 2024), Transport Modelling Technical Note and Summary (November 2024)³³ and Technical Note 1 (29 October 2025)³⁴.

The Council advised on 6 January 2026 that National Highways have no outstanding concerns regarding the transport evidence or the soundness of the Plan³⁵.

Q1.10. Is the Plan based on proportionate, up-to-date and adequate evidence about the impacts that the development proposed will have on the strategic and local road networks?

Q1.11. Would the development proposed in the Plan, in combination with other committed and planned development, have an unacceptable impact on highway safety or would the residual cumulative impacts on the road network be severe? In particular:

- (a) Could any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?
- (b) Does the submitted Plan contain effective policies to secure the necessary mitigations?

³¹ NPPF 110 and 111.

³² CD18 paragraph 2.1.

³³ EB66, EB67 and EB68.

³⁴ PS2.

³⁵ PS12 published 6 January 2026.

Developer contributions

Policy IM1 seeks developer contributions towards strategic infrastructure defined in the Infrastructure Delivery Plan (IDP). The IDP is in Appendix 7 of the Plan and describes itself as a living document which provides an initial overview of the infrastructure required to support the growth identified through the Plan. The Council's response to PQ5 advises that the IDP is not intended to be part of the Plan.

Q1.12 Does policy IM1 need to be modified to clarify that the IDP is not part of the Plan, and to give it appropriate weight in decision making?

Viability

Local plans should be informed by a proportionate assessment of viability that takes into account all relevant policies and local and national standards, including the cost implications of the Community Infrastructure Levy and section 106. The assessment should demonstrate that the total cumulative cost of all relevant policies will not undermine deliverability³⁶.

The Council's Viability Report and Addendum (October 2024)³⁷ tested the impact of the main policies³⁸ which may have an impact on viability using a residual land value and development typology approach, including sensitivity scenarios.

Q1.13 Does the viability evidence make reasonable assumptions, including about:

- (a) The cost of meeting all of the policy requirements included in the Plan along with any other relevant national standards.
- (b) The value of development.
- (c) Benchmark land values (the price a willing landowner would be likely to sell their land for).

Q1.14 Does the viability evidence indicate that the total cumulative cost of all relevant policies will not undermine the viability of the development that the Plan assumes will take place during the plan period, including on each of the site allocations?

³⁶ PPG ID:10 (2019).

³⁷ EB22 and EB23.

³⁸ EB22 Appendix 1.

M2. Amount of development required in the plan period

The submitted Plan covers the period 2021 to 2041.

2041 end date

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.

The Council's response to SPQ16 advises that, if it were necessary to modify the Plan so that strategic policies looked ahead over a minimum 15 year period from adoption, the policies that would be affected would be those relating to quantified needs for housing and employment development (DS1, JE1, H1 and H7).

The Council's response to SPQ16 goes on to set out why it considers it unnecessary and "illogical" to modify those policies so that they look ahead to 2042 (notwithstanding national policy).

Q2.1. Is it necessary to modify policies DS1, JE1, H1 and H7 so that they set out housing requirements, employment land requirements, and requirements for traveller accommodation to 31 March 2042?

2021 start date

NPPF 15 expects plans to be up-to-date.

Whilst many policies in the Plan are not time bound, those relating to quantified needs for development (including those referred to in relation to Q2.1 above) date back to 2021. This would be more than six years before the expected date of adoption.

The Council's responses to PQ17, SPQ17.1, and PQ22 advise that the Plan's policies look ahead from 2021 as this is the base date for the evidence which has been used to formulate the Plan, some of which was produced jointly with partners. The response to SP17.1 acknowledges that some of the evidence could be used to inform policies that look forward from a more recent date than 2021, and the response to SP17.2 seems to indicate that it would only be policies DS1 and H1 setting out the housing and employment land that would need to be modified if a more recent start date were required. We deal with the start date for those two policies under subsequent questions below.

The Council's response to SPQ17 refers to the Nuneaton and Bedworth Local Plan having recently been adopted with a start date of 2021; we will have regard to the Inspectors' report for that plan.

The Council's response to SPQ17.1 sets out why it considers that the start date of 2021 should not be modified, including with reference to the potential implications that the Council believe would arise. However, we have not yet reached a conclusion on whether the Plan needs to be modified to ensure that it is up-to-date, let alone identified what modifications may potentially be required if that would be the case or whether we would require any evidence to be updated.

Q2.2 Irrespective of what the implications may or may not be, in principle, is it necessary to modify the Plan so that relevant strategic policies are based on a more recent date than 2021?

Local housing need and minimum housing requirement

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 2041³⁹. This is based on the Housing and Economic Development Needs Assessment 2022 (HEDNA) and Review of Coventry's Local Housing Need 2024⁴⁰. 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 projections⁴¹.

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 the Council considered to be more accurate demographic information).

The standard 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 review⁴².

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 from⁴³.

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 examination⁴⁴.

The Council's response to PQ23 advises that the latest affordability data release by ONS in March 2025 relates to 2024 and if that were applied to HEDNA methodology it would indicate an annual need for 1,447 homes per year.

The Council's response to PQ22 advises that the plan period is not determined by the HEDNA. Rather, the HEDNA generates an annual figure that has been applied to the

³⁹ Plan 3.9 and 6.10.

⁴⁰ EB8, EB9, and EB2.

⁴¹ EB8 5.146.

⁴² PPG ID: 2a-012-20190220

⁴³ PPG ID: 2a-011-20190220.

⁴⁴ PPG ID: 2a-008-20190220.

whole plan period. On that basis, it seems to us that the HEDNA annual figure (or an updated version of it to take account of the most up-to-date inputs as referred to in national guidance) could be applied to a modified plan period of 2024 to 2042.

The Council's response to SPQ22 indicates that it considers that the housing need figure in the Plan remains "robust and appropriate" and identifies what it perceives to be unsatisfactory implications if it needed to be modified to cover a different plan period. However, we have not indicated what actions may need to be taken if we decided that the housing need and requirement figure in the Plan is not consistent with national policy or justified.

Q2.3 Is the HEDNA methodology for assessing local housing need justified and consistent with national policy?

Q2.4 If policies DS1 and H1 were modified to cover the period 1 April 2024 to 31 March 2042, what would local housing need be for that period based on the HEDNA methodology using the most up-to-date inputs at the time the Plan was submitted for examination?

Housing requirement

Policy H1 includes a minimum housing requirement of 29,100 additional dwellings between 2021 and 2041 (ie equivalent to local housing need as identified in the HEDNA).

National policy expects local plans to 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 homes⁴⁵.

The Council's response to PQ24 advises different housing figures were considered during the preparation of the Plan including through sustainability appraisal in terms of their effect on the provision of affordable housing and on economic development.

Q2.5 Is setting a minimum housing requirement equivalent to local housing need justified and consistent with national policy?

Need for industrial and warehouse development

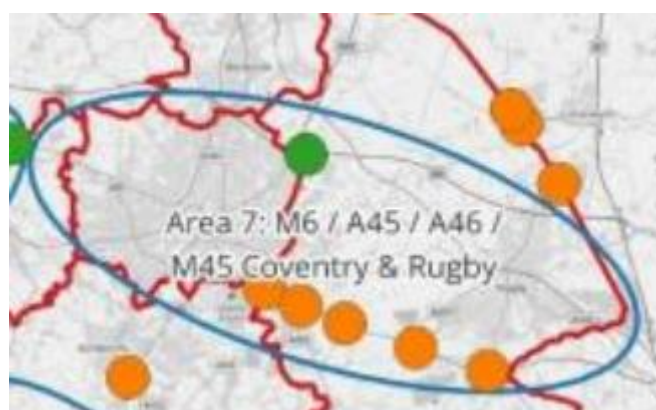
Policy DS1 part 3 states that Coventry's employment need for the period 2021 to 2041 is for 105 hectares of employment land (including qualitative replacements). We understand that the need for 105 hectares is based on average completions of industrial and warehouse floorspace on "non strategic" sites in Coventry between 2011 and 2024 projected forward. That need for additional floorspace was converted into hectares by applying a plot ratio of 0.4⁴⁶.

⁴⁶ EB10 paras 3.8 to 3.11 and 3.15 to 3.19.

Policy DS1 part b(ii) refers to a sub regional need in Coventry and Warwickshire and paragraph 3.11 refers to the need for large scale warehousing and logistic industries (“big box units” on sites of 25 hectares or more) across the wider West Midlands region.

The Coventry and Warwickshire HEDNA - West Midlands Strategic Employment Sites Study Alignment Paper (September 2024) (“Employment land alignment paper”)⁴⁷ identifies:

- A need for 105 ha of land for industrial and warehouse uses on non-strategic sites in Coventry between 2021 and 2041⁴⁸.
- A need for between 9 hectares and 84 hectares of land for industrial and warehouse uses on strategic sites⁴⁹ in the relevant part of the West Midlands that includes Coventry and Rugby (M6 / A45 / A46 / M45) between 2021 and 2045⁵⁰.



The Council’s response to SPQ17.1 states that the Employment Land Review, which has a start date of 2021, is aligned to the HEDNA but would not be impacted by a reviewed start date as the Alignment Paper calculations in respect of the supply/demand balance for industrial land superseded those of the earlier ELR.

Q2.6 (a) Is the assessment that 105 hectares of additional land are required to meet Coventry’s local need for industrial and warehouse development between 2021 and 2041 justified by adequate, proportionate and up-to-date evidence?

(b) If policy DS1 was modified to cover the period 2024 to 2042, what would the local need for industrial and warehouse development be based on that available evidence?

Q2.7 (a) Is the assessment that (in addition to the 105 hectares to meet Coventry’s local need) up to 84 hectares of additional land (comprising sites of over 25 hectares suitable for units of over 9,000 sqm) are required in Coventry and/or Rugby between 2021 and 2045 justified by adequate, proportionate and up-to-date evidence?

(b) If policy DS1 were modified to cover the period 2024 to 2042, how would that sub regional figure need to be modified based on that available evidence?

⁴⁷ EB10.

⁴⁸ EB10 Table 3.9

⁴⁹ EB10 para 1.5: Large scale employment sites typically over 25 ha and largely dedicated to units of over 9,000 sqm.

⁵⁰ EB10 para 4.11: Area 7.

Q2.8 Irrespective of the plan period and the specific figures, does the Plan need to be modified to clearly set out the quantified local and sub regional needs for industrial and warehouse developments?

Need for office development

The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA)⁵¹ and Coventry Office Market Study 2024⁵² identify a need for 8.5 hectares of land for office development in Coventry between 2021 and 2041 (based on labour demand modelling and including a flexibility margin).

The Plan does not seem to specify what the quantified need for additional office development is either in hectares of land or square metres of floorspace.

The Council's response to SPQ17.1 states that should the base period of the plan be changed from 2021 to 2024, this would require the needs evidence set out in the HEDNA to be recalculated for office development.

Q2.9 (a) Do the HEDNA and Coventry Office Market Study 2024 represent adequate, proportionate and up-to-date evidence of the need for additional office development in Coventry?

(b) What does that evidence indicate the need for office development would be if the plan were modified to cover the period 2024 to 2042?

Q2.10 Irrespective of the plan period and the specific figures, does the Plan need to be modified to specify the quantified need for additional office development in Coventry in (a) hectares of land and/or (b) square metres of floorspace?

⁵¹ EB8.

⁵² EB13D.

M3. Housing allocations

Site selection methodology

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 Plan⁵³ in the context of national planning guidance⁵⁴. The choice of sites to allocate was also informed by the viability assessment⁵⁵ and sustainability appraisal⁵⁶.

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 Belt⁵⁷. The discounted sites were not considered to be reasonable alternatives for the purpose of the sustainability appraisal. Most of the 44 non-discounted sites are allocated in the Plan (for housing or mixed use development).

The Council's response to PQ29 advises that the Plan does not allocate every site that is suitable and available for housing development – several small brownfield sites are not allocated. The Council's response to PQ26 lists sites identified in the HELAA that are included in the overall housing land supply summarised in Table 6.1 in the Plan (as "other identified (HELAA)").

We will consider whether the approach of assuming that non-allocated HELAA sites will contribute towards meeting the housing requirement involves double counting with windfall assumptions under a subsequent question.

Q3.1 Were the allocations in the Plan selected based on adequate and proportionate evidence consistent with national policy and guidance?

H2 Table 6.2 Allocations

Policy H2 states that Table 6.2 identifies the sites allocated for housing development alongside essential details that will support the principles of sustainable development. Policy H2 also states that the development of all sites will also need to be in accordance with other policies in the Plan (and supporting documents) and the Infrastructure Delivery Plan with infrastructure being secured through legal agreements and developer contributions where appropriate.

National policy states that local plan policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals⁵⁸. National

⁵³ EB12.

⁵⁴ PPG ID: 3 (22 July 2019).

⁵⁵ EB22.

⁵⁶ CD4.

⁵⁷ EB12 paras 3.70 to 3.73 and Appendix 1 "discounted sites" pages 111-138 and 147-211.

⁵⁸ NPPF 16d.

guidance states that where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development⁵⁹.

Q3.2 Does the Plan contain sufficient detail to provide clarity to developers, local communities and other interested parties about the nature and scale of development proposed on the site allocations listed in Table 6.2?

Table 6.1 in the Plan indicates that “remaining allocations (2017 local plan)” will accommodate 2,733 homes between 2021 and 2041 and that “proposed new site allocations” will accommodate 3,503 homes. Table 6.2 in the Plan lists “sites allocated for housing” HS2.1 to HS2.38.

The Council’s latest housing land supply information published on 28 November 2025 includes a completed pro forma for each allocation summarising the available evidence in the context of national policy and guidance⁶⁰ relating to “deliverable” and “developable” sites. We refer to that information in our questions below about each of the allocations.

The Council’s latest evidence indicates that the following allocations had been completed by 31 March 2025:

- H2.5 Paragon Park (700 homes)
- H2.10 Lyng Hall playing fields (185 homes)
- H2.13 Grange Farm (105 homes - completed)
- H2.17 Nursery sites, Browns Lane (80 homes)
- H2.18 Mercia sports field (75 homes).
- H2.23 Cryfield Heights / Gibbet Hill (20 homes)

Q3.3 Does the Plan need to be modified to delete the allocations that had been developed by 31 March 2025?

Mixed use allocations

H2.1 and DS4C Keresley SUE

Table 6.2 in the Plan indicates this site will accommodate 3,100 homes. The Council’s latest evidence indicates that most of the site has planning permission; development is underway; 1,478 homes will be completed between 2027 and 2032; and a total of 3,000 will be completed by 2035.

Q3.4 Is there a reasonable prospect that around 3,000 homes will be completed on allocation H2.1 by 2041?

Q3.5 Is there a realistic prospect that 1,478 homes will be completed on allocation H2.1 between 1 April 2027 and 31 March 2032?

⁵⁹ PPG ID: 61-002-20190315.

⁶⁰ PPG ID: 68-007-20190722 and PPG ID: 68-020-20190722.

Q3.6 Are the essential site specific requirements for allocation H2.1 in Table 6.2 and policy DS4C justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.2, JE2.5 and DS4D Eastern Green SUE

Table 6.2 in the Plan indicates this site will accommodate 2,500 homes. The Council's latest evidence indicates that most of the site has planning permission; development is underway; 695 homes will be completed between 2027 and 2032; and a total of 3,144 will be completed by 2040.

Q3.7 Is there a reasonable prospect that around 3,144 homes will be completed on allocation H2.2 by 2041?

Q3.8 Is there a realistic prospect that 695 homes will be completed on allocation H2.2 between 1 April 2027 and 31 March 2032?

Q3.9 Are the essential site specific requirements for allocation H2.2 in Table 6.2 and policy DS4D justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.37 City centre south

This allocation covers 6.9 hectares in the city centre, mostly within the primary shopping area, immediately to the north of allocation H2.38. Table 6.2 in the Plan indicates 1,575 homes being built in the plan period. The Council's latest evidence lists a number of planning permissions and indicates that phase 1 demolition is underway; 1,028 homes will be completed between 2027 and 2032; and a total of 1,575 will be completed by 2035.

Q3.10 Is there a reasonable prospect that around 1,575 homes will be completed on allocation H2.37 by 2041?

Q3.11 Is there a realistic prospect that 1,028 homes will be completed on allocation H2.37 between 1 April 2027 and 31 March 2032?

Q3.12 Are the essential site specific requirements for allocation H2.37 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site? In particular:

- a) What is meant by the "total allocation" being "linked to" the specified outline and reserved matters permissions?
- b) Are the types and amounts of development proposed on the site clear?
- c) Is the reference to "retention and enhancement of heritage asset" clear and effective?

H2.38 and JE2.1 Friargate

The allocation is in the city centre immediately to the south of the primary shopping area and allocation H2.37. Table 6.2 in the Plan indicates 1,350 homes being built in the plan period. The Council's latest evidence refers to an extant planning permission and that a new application is expected when a revised masterplan has been completed. 450 homes are expected to be completed between 2027 and 2032 and a total of 1,350 by 2036.

Q3.13 Is there a reasonable prospect that around 1,350 homes will be completed on allocation H2.38 by 2041?

Q3.14 Is there a realistic prospect that 450 homes will be completed on allocation H2.38 between 1 April 2027 and 31 March 2032?

Q3.15 Are the essential site specific requirements for allocation H2.38 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site? In particular:

- a) What is meant by the "total allocation" being "linked to" the specified extant permission?
- b) Are the types and amounts of development proposed on the site clear?
- c) Is the reference to development being sensitive to "view cone 12" in the specified document clear and effective?

H2.4 and JE2.6 Whitmore Park

Table 6.2 in the Plan indicates 730 homes being built in the plan period. The Council's latest evidence indicates that development is at an advanced stage and that 722 homes are expected to be completed by 2028.

Q3.16 Is there a reasonable prospect that around 722 homes will be completed on allocation H2.4 by 2041?

Q3.17 Is there a realistic prospect that 60 homes will be completed on allocation H2.4 between 1 April 2027 and 31 March 2032?

Q3.18 Are the essential site specific requirements for allocation H2.4 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.7 and JE2.8 Aldermans Green Road / Sutton Stop

Table 6.2 in the Plan indicates 285 homes being built in the plan period. The Council's latest evidence indicates that reserved matters were approved in 2025; 162 homes will be completed between 2027 and 2032; and a total of 262 will be completed by 2034.

Q3.19 Is there a reasonable prospect that around 262 homes will be completed on allocation H2.7 by 2041?

Q3.20 Is there a realistic prospect that 162 homes will be completed on allocation H2.7 between 1 April 2027 and 31 March 2032?

Q3.21 Are the essential site specific requirements for allocation H2.7 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.20 and JE2.7 Durbar Avenue

Table 6.2 in the Plan indicates 45 homes being built in the plan period. The Council's latest evidence the site being developed in the late 2030s.

Q3.22 Is there a reasonable prospect that around 45 homes will be completed on allocation H2.20 by 2041?

Q3.23 Are the essential site specific requirements for allocation H2.20 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

Housing allocations with permission at 1 April 2025

H2.3 Walsgrave Hill Farm

Site H2.03 Walsgrave Hill Farm is a longstanding local plan allocation for up to 900 homes. The HELAA notes a capacity of 900 units with no planning permission. Despite this, the updated trajectory notes that there are 700 units remaining, with a trajectory for delivering those remaining 700 units, commencing in 2029 and being completed in 2037.

Q3.24 Are the essential site specific requirements for allocation H2.3 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

Q3.25 Is there a realistic prospect that 125 homes will be completed between 2027 and 2032?

Q3.26 Is there a reasonable prospect that the remaining 700 homes will be completed on allocation H2.3 by 2041?

H2.28 New Gate Court Business Park

Site H2:28 is described in the Plan as a "consented application" delivering 303 units on previously developed land. The HELAA suggests that the site will be delivered in years 1-5 of the plan period.

Q3.27 Is there a reasonable prospect that 303 homes will be completed on allocation H2.28 by 2032?

Q3.28 Are the essential site specific requirements for allocation H2.7 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.8 Cromwell Lane

The updated trajectory (CD16) notes that this site is under construction.

Q3.30 Is there a realistic prospect that the site will deliver 150 units between 2027 and 2032?

H2.9 London Road / Allard Way

The updated trajectory (CD16) notes that this site is under construction.

Q3.31 Is there a realistic prospect that the site will deliver 193 units between 2027 and 2032?

H2.14 Transco site, Abbots Lane

The most up to date information from the Council (PS10a) suggests that the total capacity of this site is 690 dwellings, with 212 completions between 2027 and 2032, and 690 completions by 2041.

Q3.32 Is Table 6.2 incorrect with regard to the total dwellings on site H2.14?

Q3.33 Is there a realistic prospect that 212 homes will be completed between 2027 and 2032?

Q3.34 Is there a reasonable prospect that 690 homes will be completed on allocation H2.14 by 2041?

H2.11 Elms Farm

The latest evidence (PS10a) notes that development on this site is due to be completed in 2024/2025.

Q3.35 Is there a realistic prospect that the site will be completed in 2024/2025?

H2.12 LTI Factory, Holyhead Road

Table 6.2 in the Plan indicates 110 homes being built in the plan period. The Council's latest evidence indicates that development is underway; most of the homes being completed before 31 March 2027; and that 23 will be completed in 2033/34.

Q3.36 Is there a reasonable prospect that around 110 homes will be completed on allocation H2.12 by 2041?

Q3.37 Are the essential site specific requirements for allocation H2.12 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.35 Former school, Isadora Lea

Table 6.2 in the Plan indicates 93 homes being built in the plan period. The Council's latest evidence indicates that development is underway and expected to be completed in 2027/28.

Q3.38 Is there a reasonable prospect that around 93 homes will be completed on allocation H2.35 by 2041?

Q3.39 Are the essential site specific requirements for allocation H2.35 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.21 Woodfield school site, Stoneleigh Road

Table 6.2 in the Plan indicates 30 homes being built in the plan period. The Council's latest evidence indicates that 24 homes are expected to be built between 2030 and 2032.

Q3.40 Is there a realistic prospect that 30 homes will be completed on allocation H2.21 between 1 April 2027 and 31 March 2032?

Q3.41 Are the essential site specific requirements for allocation H2.21 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.24 Cheltenham Croft

Q3.42 What evidence justifies the inclusion of this site as an allocation in the Plan?

Allocations without permission at 1 April 2025

H2.36 Spon End

Table 6.2 in the Plan includes a "total dwellings" figure of 750 for allocation H2.36 land at Spon End. The Council's response to PQ30 advises that 275 net additional homes would be provided on the site as 471 would be demolished and 746 built under a proposal that was granted planning permission in October 2025 subject to completion of a section 106 agreement. The Council's latest evidence indicates 106 net additional homes are expected between 2027 and 2032 and a total of 275 net additional homes by 2033.

Q3.43 Is there a reasonable prospect that around 275 net additional homes will be completed on allocation H2.36 by 2041?

Q3.44 Is there a realistic prospect that 106 net additional homes will be completed on allocation H2.36 between 1 April 2027 and 31 March 2032?

Q3.45 Are the essential site specific requirements for allocation H2.36 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.26 Coventry central police station

Table 6.2 in the Plan indicates 600 homes being built in the plan period. The Council's latest evidence indicates that all of those homes are expected to be built after 2036.

Q3.46 Is there a reasonable prospect that around 600 homes will be completed on allocation H2.26 by 2041?

Q3.47 Are the essential site specific requirements for allocation H2.26 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.6 Browns Lane

Table 6.2 in the Plan indicates 475 homes being built in the plan period. The Council's latest evidence indicates that all of those would be completed from 2033 onward.

Q3.48 Is there a reasonable prospect that around 475 homes will be completed on allocation H2.6 by 2041?

Q3.49 Are the essential site specific requirements for allocation H2.6 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.31 Paybody building

Q3.50 Is site H2:31 developable given its current use?

Q3.51 Is there a reasonable prospect that 280 homes will be completed on allocation H2.31 by 2041?

H2.15 Sandy Lane

Q3.52 Are the essential site specific requirements for allocation H2.15 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

Q3.53 Are the heritage considerations appropriately addressed in an effective, clear and unambiguous way?

Q3.54 Is there a realistic prospect that 107 homes will be completed on allocation H2.15 between 1 April 2027 and 31 March 2032?

Q3.55 Is there a reasonable prospect that around 250 homes will be completed on allocation H2.15 by 2041?

H2.32 Dale buildings

The Council has now produced a Site Allocation Heritage Impact Assessment for this site⁶¹ which has been reviewed by Historic England and referred to in the Statement of Common Ground with them⁶². It concluded that the site should be subject to a robust and suitably enforced suite of design parameters. The SOCG with Historic England proposed a modification to include a number of additional site-specific requirements for inclusion within Table 6.2.

Q3.56 Are the essential site specific requirements for allocation H2.32 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

Q3.57 Is the policy sufficiently positively prepared and effective in ensuring that the heritage constraints and opportunities are clear and unambiguous?

Q3.58 Is the modification proposed in conjunction with Historic England⁶³ necessary to ensure that the allocation is effective in recognising the findings from the HIA, conserving and enhancing the historic environment and delivering housing on the site?

Q3.59 Is there a reasonable prospect that around 200 homes will be completed on allocation H2.32 by 2041?

H2.30 Whitefriars Street car park

The Council has now produced a Site Allocation Heritage Impact Assessment for this site⁶⁴ which has been reviewed by Historic England and referred to in the Statement of Common Ground with them⁶⁵. It concluded that the site may be constrained by archaeological factors requiring further detailed work. The SOCG with Historic England proposed a modification to include a number of additional site-specific requirements for inclusion within Table 6.2.

⁶¹ PS8 and PS8a

⁶² PS13

⁶³ PS13

⁶⁴ PS7

⁶⁵ PS13

Q3.60 Are the essential site specific requirements for allocation H2.30 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

Q3.61 Are the heritage considerations appropriately addressed in an effective, clear and unambiguous way?

Q3.62 Is the modification proposed in conjunction with Historic England⁶⁶ necessary to ensure that the allocation is effective in recognising the findings from the HIA, conserving and enhancing the historic environment and delivering housing on the site?

Q3.63 Will the allocation, and the detail on it within the Plan, ensure that any development on this site properly addresses the potential for archaeological remains within the site?

Q3.64 Is there a reasonable prospect that around 185 homes will be completed on allocation H2.30 by 2041?

H2.27 New Union Street car park

Q3.65 Are the essential site specific requirements for allocation H2.27 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

Q3.66 Are the heritage considerations appropriately addressed in an effective, clear and unambiguous way?

Q3.67 Is there a reasonable prospect that around 185 homes will be completed on allocation H2.27 by 2041?

H2.29 Vintage House

Q3.68 Is there a reasonable prospect that around 100 homes will be completed on allocation H2.29 by 2041?

H2.16 Carlton Road / Old Church Road

Q3.69 Is there a reasonable prospect that around 85 homes will be completed on allocation H2.16 by 2041?

H2.19 Mitchell Avenue

Q3.70 Are the essential site specific requirements for allocation H2.27 in Table 6.2, in particular the replacement pitches, justified?

⁶⁶ PS13

Q3.71 Is there a reasonable prospect that around 50 homes will be completed on allocation H2.19 by 2041?

H2.34 Chace school

Table 6.2 in the Plan indicates 60 homes being built in the plan period. The Council's latest evidence indicates 30 homes will be completed in 2031/32 with the remaining 30 the following year.

Q3.72 Is there a reasonable prospect that around 60 homes will be completed on allocation H2.34 by 2041?

Q3.73 Is there a realistic prospect that 30 homes will be completed on allocation H2.34 between 1 April 2027 and 31 March 2032?

Q3.74 Are the essential site specific requirements for allocation H2.34 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.33 Allesley Hotel

Table 6.2 in the Plan indicates 48 homes being built in the plan period. The Council's latest evidence indicates all of those being completed between 2030 and 2032.

Q3.75 Is there a realistic prospect that 48 homes will be completed on allocation H2.33 between 1 April 2027 and 31 March 2032?

Q3.76 Are the essential site specific requirements for allocation H2.34 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.22 Jardine Crescent / Jobs Lane

Table 6.2 in the Plan indicates 25 homes being built in the plan period. The Council's latest evidence indicates all of those being completed in 2036/37.

Q3.77 Is there a reasonable prospect that around 25 homes will be completed on allocation H2.22 by 2041?

Q3.78 Are the essential site specific requirements for allocation H2.22 in Table 6.2 justified, and will they, along with other policies in the Plan, be effective in achieving sustainable development on the site?

H2.25 Grange children's home, Waste Lane

Q3.79 Is there a reasonable prospect that around 15 homes will be completed on allocation H2.25 by 2041?

M4. Housing land 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 2021-2041	31,493

Table 6.2 lists “sites allocated for housing” HS2.1 to HS2.38. Further information about the housing land supply identified in the Plan is set out in a housing trajectory dated December 2024 (Appendix 3 submitted with the Plan⁶⁷).

An updated housing trajectory dated August 2025 was also submitted with the Plan⁶⁸. However, that was not part of the submitted Plan, and in any case has been superseded by another updated trajectory and other information published in November and December 2025 in response to PQ33 and PQ34⁶⁹.

The Council’s latest housing land supply information identifies the following supply for the period 2021 to 2041:

• Completions 2021-2025	8,156
• Expected completions 2025-2027	2,934
• Commitments	9,933
• Allocations	4,998
• HELAA 2024	2,145
• Windfalls	2,600
• Total 2021-2041	30,766

Supply for five years following adoption

National policy expects plans to identify a supply of specific, deliverable sites for five years following the intended date of adoption with an appropriate buffer⁷⁰.

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.

Five year requirement

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

⁶⁷ CD1a (December 2024).

⁶⁸ CD16 (August 2025).

⁶⁹ PS5 Housing trajectory explanatory paper including trajectory at Appendix 6 (November 2025), PS9 (PQ33 five year supply at 1 April 2027) and PS10 and PS10a (PQ34 housing site proformas).

⁷⁰ NPPF 69a and 77 and footnote 43.

Test indicates delivery has fallen below 85% of the requirement⁷¹. 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.

The Council's response to PQ31 advises that the five year requirement for the period from 1 April 2027 is 6,754 homes. This is based on an annual requirement of 1,455 for the plan period and a residual requirement taking account of actual and anticipated completions between 1 April 2021 and 31 March 2027, and applying a 5% buffer.

As the actual number of completions in 2025/26 and 2026/27 is not known, an alternative approach to calculating the five year requirement from 1 April 2027 would be to simply base it on the annual requirement of 1,455 and apply a 10% buffer as referred to in NPPF December 2023. That would indicate a five year requirement of 8,002 homes from 1 April 2027.

Q4.1. Assuming the annual requirement of 1,455 for the plan period is justified, is the Council's calculation that the five year requirement from 1 April 2027 is 6,754 justified and consistent with national policy? In particular:

- a) Taking account of actual completions between 2021 and 2025.
- b) Taking account of anticipated completions between 2025 and 2027.
- c) The 5% buffer.

Five year supply

The Council's response to PQ32 advises that the supply of specific, deliverable sites for the period 1 April 2027 to 31 March 2032 is 8,368 homes. This is made up of the following:

• Sites with detailed planning permission*	5,495
• Sites with outline planning permission for fewer than 10 homes*	8
• Sites with outline planning permission for 10 or more homes**	998
• Sites with a grant of permission in principle**	0
• Allocations in the Plan that do not fall into any of the above categories**	915
• HELAA 2024	152
• Windfalls	800
• Total	8,368

* 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.

The Council's response to PQ33 lists 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

⁷¹ PPG ID: 68-010-20190722.

period⁷². The Council's response to PQ34 includes completed pro formas for each of those sites⁷³.

Q4.2 Is there clear evidence to indicate that a total of 5,495 homes will not be completed between 1 April 2027 and 31 March 2032 on the sites with detailed planning permission?

Q4.3 Is there clear evidence to demonstrate that there is a realistic prospect that 998 homes will be completed between 1 April 2027 and 31 March 2032 on the sites with outline planning permission?

Q4.4 Is there clear evidence to demonstrate that there is a realistic prospect that 1,067 homes will be completed between 1 April 2027 and 31 March 2032 on the allocations without planning permission?

Q4.5 Is the inclusion of a windfall allowance of 952 (800 + 152) in the five year supply from 1 April 2027 justified and consistent with national policy?

Supply for remainder of plan period

The Council's latest trajectory assumes 2,934 (1,002 + 1,932) homes will be completed between 1 April 2025 and 31 March 2027. 2,681 of those are on sites that were under construction on 1 April 2025, and the majority of the others had detailed planning permission

Q4.6 Is there a reasonable prospect that a total of 2,934 homes will be completed between 1 April 2025 and 31 March 2027 on sites under construction or with planning permission on 1 April 2025?

The Council's latest evidence indicates that 11,308 homes will be completed between 1 April 2032 and 31 March 2041. That supply is made up of the following:

• Sites with detailed planning permission	335
• Sites with outline planning permission	3,097
• Allocations without planning permission	4,083
• HELAA 2024	1,993
• Windfalls	1,800
• Total	11,308

The Council's responses to PQ26 and SPQ26 advise that smaller brownfield sites, described as "other identified sites", have been assessed in the HELAA but not allocated as to do so would not have been practical.

The Council's response to SP28 advises that the latest housing trajectory assumes that 1,500 homes will be completed in the Northern Regeneration Area on sites not allocated in

⁷² PS9.

⁷³ PS10 and PS10a.

the Plan because, whilst it is at “concept stage” it is a key regeneration project for the Council and region.

In total, the latest trajectory assumes 3,793 (1,993 + 1,800) homes will be built on sites not allocated in the Plan between 2032 and 2041. The Council’s response to SPQ29 sets out why it considers that to be justified.

Q4.7 Is there a reasonable prospect that a total of 3,432 homes will be completed between 1 April 2032 and 31 March 2041 on sites with planning permission as at 1 April 2025?

Q4.8 Is there a reasonable prospect that a total of 4,083 homes will be completed between 1 April 2032 and 31 March 2041 on allocations that did not have planning permission on 1 April 2025?

Q4.9 Is the inclusion of a windfall allowance of 3,793 in the housing land supply between 1 April 2032 and 31 March 2041 justified and consistent with national policy?

H1 parts 2 and 3

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.

The Council’s response to PQ35 advises that policy H1 part 2 is not intended to set a stepped (up and down) trajectory but to refer to the trajectory in Appendix 3 which shows how the development will be delivered over the plan period. The response proposes a modification intended to clarify policy H1 part 3:

“The principle of developing land identified for housing in the Local Plan will be supported
~~Housing land will be released~~ in order to maintain a continuous 5 year supply. ~~of housing~~
~~land in order to support~~ The varied nature of the component sites in Table 6.1 will
~~encourage the and flexible land supply to support housing delivery and of~~ sustainable
development. This will be monitored through the Council’s Annual Monitoring Report.”

Q4.10 Is policy H1 part 3 clearly written and unambiguous so it is evident how a decision maker should react to a development proposal? (b) If not, would the Council’s proposed modification make it sound?

M5. Housing development management policies

H3 Provision of new housing

Q5.1. Is policy H3 consistent with national policy and justified, including by evidence relating to need and viability? In particular:

- a) The requirements in parts 1a and 1b for all new homes to comply with the nationally described space standards and the internal and external space standards in the three specified supplementary planning documents.
- b) The requirement in part 1c for all new homes to meet building regulation M4(2) accessible and adaptable dwellings.
- c) The requirement in part 1d for 10% of homes on major schemes to meet building regulation M4(3) wheelchair user dwellings.
- d) The requirements in part 1e relating to accessible natural greenspace and developer contributions towards green and blue infrastructure provision.
- e) The requirement in part 6 to “conform to the City Council’s adopted Transport Strategy”.

H4 Securing a mix of housing

Q5.2 Is the requirement in policy H4 part 1 for residential development to include a mix of market housing in accordance with the latest Housing and Economic Development Needs Assessment (other than in the circumstances set out in part 2) justified?

H9 Residential density

Q5.3 Is policy H9 justified and effective? In particular:

- a) The densities for greenfield sites, brownfield sites, the city centre, and the city centre transition zone set out in part 3.
- b) Is the city centre transition zone clearly defined on the policies map such that it is unambiguous whether a particular site is located within it?

H6 Affordable housing

Whilst we are examining the Plan in the context of NPPF published in December 2023, policies in current NPPF (February 2025) should be taken into account in dealing with planning applications⁷⁴. The current NPPF definition of affordable housing, and policies in paragraphs 64 to 68, will therefore apply; this may have implications for the requirements of policy H6.

The Plan paragraph 6.24 refers to an annual need for 941 affordable homes to rent and 149 affordable homes for sale, although not all of that need would be met by new build.

Policy H6 part 3 states that new residential developments of 10 or more dwellings (gross) located within the area the area identified at Appendix 9c on individual sites, or on sites of more than 1 hectare will be required to provide 25% as affordable homes (excluding purpose built student, co-living and build to rent accommodation which are covered by parts

⁷⁴ NPPF 231 (February 2025).

5, 6 and 7). Appendix 9c⁷⁵ includes a map showing two areas: one “applicable to policy H6 part 3” and the other “not applicable to policy H6 part 3”. The Council’s response to PQ37 advises that the policies map should define the areas shown on in Appendix 9c.

The Council’s response to PQ38 proposes a modification to policy H6 part 3 to delete 1 hectare and insert 0.5 hectare (to be consistent with the NPPF definition of major development).

The Council’s response to PQ39 advises that policy H6 part 3 is intended to apply to specialist housing including for older persons (policy H8).

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. Those requirements are considered in the issues below relating to policies H10, H12 and H13.

- Q5.4 Is policy H6 consistent with national policy and justified and will it be effective in helping to meet the identified need for affordable homes? In particular:
- a) Does the policy map need to be changed to designate the part of the city within which the requirement in part 3 to provide affordable homes applies?
 - b) Is it clear which types of residential development are required to provide 25% affordable housing in different parts of the city?
 - c) Is the Council’s proposed modification (to delete 1 hectare and insert 0.5 hectare) necessary to make the Plan sound?
 - d) Is the requirement in part 1 for affordable housing delivery to be in accordance with the Council’s Affordable Housing SPD justified?
 - e) Is the 25% requirement in part 3 justified by proportionate and adequate evidence relating to need and viability?
 - f) Is the requirement in part 8 for 60% of the affordable homes provided to be for rent, and at least 50% of those to be for social rent, consistent with national policy?
 - g) Is the requirement in part 10 for the “size mix” of affordable homes to be informed by the HEDNA, latest Homefinder data, and engagement with the Council and Registered Providers justified and effective?
 - h) Is the requirement in part 14 for all affordable homes to be in accordance with the internal and external standards set out in SPD justified?

H10 Student accommodation

The Council’s response to PQ44 advises that 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.

- Q5.5 Is policy H10 justified and will it be effective in allowing the need for student accommodation to be met in appropriate locations? In particular:
- a) Is the requirement in part 1 for purpose built student accommodation (PBSA) to be located within or immediately adjacent to the University of Warwick Campus or Coventry University Campus other than in exceptional circumstances justified?
 - b) Is the meaning of “the Council’s PBSA monitor and manage approach” in part 2 clear?

⁷⁵ CD1a page 87.

- c) Is the requirement in part 2b for PBSA proposals outside one of the campuses to have support from one of the universities justified?
- d) Is the meaning of part 4 relating to “developments that comprise a predominant studio ratio” clear?
- e) Is the requirement in part 5 for proposals to comprise predominantly cluster units of no more than 8 units per cluster justified?
- f) Is the meaning of “high quality affordable products” clear and is the reference to being “in line with the design standards set out in the Residential Design Guide SPD” justified (part 6)?
- g) Is the requirement in policy H6 part 5 for PBSA developments of 25 bed spaces or more outside one of the two campuses to make a financial contribution in lieu of on-site 20% affordable housing provision justified?

H12 Build to rent accommodation

The Council's response to PQ40 advises that the requirements for affordable housing in proposals for build to rent accommodation are intended to apply to all parts of the city.

Q5.6 Is policy H12 consistent with national policy, justified and effective? In particular, is the requirement in part 1h (via policy H6 part 6) for 10% of build to rent homes (in developments of 10 homes or more) to be affordable justified by evidence of need and viability (and having regard to the 20% benchmark referred to in national guidance⁷⁶)?

H13 Co-living accommodation

The Council's response to PQ40 advises that the requirements for affordable housing in proposals co-living accommodation are intended to apply to all parts of the city.

The Council's response to PQ45 advises policy H13 needs to be reformatted as point h has been incorrectly labelled and should be sub-point i to point g, so that point g has four sub-points (i-iv). Points i, j and k are then also mislabelled and should be points h, i, and j.

Q5.7 Is policy H13 justified and effective? In particular:

- a) The minimum bedroom size of 25 sqm in part 1a.
- b) The minimum average internal communal space of 4.5 sqm per bedspace in part 1f.
- c) The requirements relating to communal kitchens in part 1h.
- d) The requirement in part 1k (via policy H6 part 7) for 25% of bedspaces (in developments of 25 bedspaces or more) to be provided as affordable private rent.
- e) The minimum tenancy length of 3 months in part 1e.

H8 Specialist housing including for older persons

Policy H8 part 2 refers to “key local services listed in point 3 of policy H3”. We assume this is meant to refer to policy H3 part 4.

⁷⁶ PPG ID: 60-002-20180913.

The Council's response to PQ39 advises that policy H6 part 3 (affordable housing) is intended to apply to proposals for specialist housing including for older persons (policy H8) ie contributions.

Q5.8 Is policy H8 justified and effective? In particular:

- a) Is the requirement in part 1 for applicants to demonstrate a local need justified?
- b) Is it clear that proposals for specialist housing are expected to provide affordable homes, and is that requirement justified by evidence relating to need and viability?

H5 Managing existing housing stock

Q5.9 Is policy H5 justified and effective? In particular, the restriction in part 3 relating to the conversion of dwellings to non-residential uses unless there are very special circumstances.

H7 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 11-15⁷⁷.

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.

The Council's response to PQ41 advises that the GTAA 2023 is up to date as it presents an overall cultural need when considering the broader need from all Gypsies and Travellers regardless of their nomadic habit of life patterns.

Q5.10 (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?

⁷⁷ 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.

The Council's response to PQ43 advises that the Siskin Drive site, in the south of the city, is defined on the submission policies map in yellow and that the Burbages Lane site is not but this will be added.

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.

The Council's response to PQ42 advises that there are currently 5 authorised pitches on the private site on Burbages Lane and 12 pitches have been provided following the redevelopment of the former council site at Siskin Drive. There is potential to meet the additional need for 6 pitches through the expansion of the existing site at Burbages Lane to meet the extended family needs associated with that site.

Q5.11 Does the Plan identify a sufficient supply of 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 2032 (ie five years following adoption)?
- specific, developable sites or broad locations for the remainder of the plan period?

M6. Economic development and employment land supply

Plan paragraph 5.11 defines employment uses as those falling within Use Classes B2 general industrial, B8 storage or distribution, and E(g) office, research and development, and light industrial.

JE1 Overall economy and employment strategy

Q6.1 Is policy JE1 justified and effective? In particular, is it clear whether parts a to j are intended to be relevant to the preparation and determination of planning applications?

JE2 parts 4 and 5 Key Employment Sites

The Employment Land Review identifies a total of 74 employment sites in Coventry⁷⁸. Policy JE2 part 5 lists 7 of those as Key Employment Sites. The Council's response to SPQ5 proposes changes to the submitted policies map to designate each of those sites⁷⁹.

Q6.2 (a) Are the Key Employment Sites listed in policy JE2 part 5 justified by adequate and proportionate evidence?
(b) For policy JE2 to be effective, do the sites need to be designated on the policies map in accordance with regulation 9(1)(c)?

Q6.3 Is policy JE2 part 4, which states that alternative uses will not be considered acceptable on Key Employment Sites unless exceptional circumstances demonstrate otherwise, justified?

JE3 Non-employment uses on employment land

Q6.4 Is the approach to the redevelopment of all land currently in employment use (and land last used for employment purpose) for non-employment purposes set out in policy JE3 parts 2 and 4 justified?

JE5 Industrial and storage/distribution development

Q6.5 Are the requirements in policy JE5 part 2 for employment development on land not allocated under policy JE2 justified?

JE8 Location of research and development

Q6.6 Are the requirements in policy JE8 part 2 for Eg(ii) research and development uses on land not allocated under policy JE2 justified?

⁷⁸ EB13A.

⁷⁹ PS12 and PS12b.

JE2 Employment and mixed use allocations

Q6.7 Are the following allocations proposed for employment development in policy JE2 justified and is there a reasonable prospect that they will be available and could be viably developed for industrial and warehouse uses during the plan period?

- a) JE2.3 Whitley Business Park (6.5 hectares remaining)
- b) JE2.5 Eastern Green (H2.2 mixed use including 15 hectares employment land)
- c) JE2.6 Whitmore Park (H2.4 mixed use including 2.9 hectares employment land)
- d) JE2.7 Durbar Avenue (H2.20 mixed use including 1.5 hectares employment land)
- e) JE2.8 Aldermans Green Road / Sutton Stop (H2.7 mixed use including 1.5 hectares employment land)

Policy DS1 part 1c states that the 25 hectare site JE2.4 Baginton Fields and south-east of Whitley Business Park is provided to contribute to sub regional need in Coventry and Warwickshire.

The Council's response to PQ21(a) advises that the location of JE2.4 Baginton Fields adjacent to other established employment development such as Whitley South and the Coventry Gigapark, and its designation as an "Investment Zone", means that it is ideally placed to contribute towards meeting sub regional employment land needs.

The Council's response to PQ21(b) advises that decision-maker would not need to distinguish between whether the a development proposal on JE2.4 Baginton Fields was for strategic or local need as it would suffice to consider whether it was for employment use. Distinguishing between local and strategic need would rather be for the purposes of plan monitoring.

Q6.8 (a) Is allocation JE2.4 Baginton Fields suitable for large scale warehousing development comprising units of over 9,000 sqm to help meet the identified need for such developments in the Coventry / Rugby part of the West Midlands?

(b) And / or is allocation JE2.4 Baginton Fields suitable for other types of industrial and warehouse development to help meet Coventry's local needs?

(c) Is policy JE2.4 effective in ensuring that development on the site would make an appropriate contribution to meeting the identified need for employment development in Coventry and wider sub region?

(d) Is there a reasonable prospect that the site will be available and could be viably developed for industrial and warehouse uses during the plan period?

Policy DS4 part B sets out "Whitley specific masterplan principles". However, it is not clear if these are intended to apply to allocation JE2.3 Whitley Business Park and/or JE2.4 Baginton Fields and south-east of Whitley Business Park.

Q6.9 Does policy DS4 part B need to be modified to clarify which site(s) the Whitley specific masterplan Policy principles are intended to apply to?

Q6.10 Are the "Whitley specific masterplan principles" justified and effective?

Overall industrial and warehouse land supply identified in the Plan

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.

Table 5.1 in the Plan summarises the Class B2 and B8 employment land supply for Coventry:

• Completions 2021-2024	25.4 hectares
• Commitments	6.2 hectares
• Remaining allocations (excluding JE2.4 25 ha)	28.6 hectares
• Total	60.2 hectares

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 hectares) for employment development.

Policy JE2 lists the allocations proposed for employment uses. Collectively, those allocations (excluding JE2.1 Friargate which is allocated for mixed use development including offices) are stated to have a total of 52.35 hectares "remaining" (including 25 hectares on allocation JE2.4 Baginton Fields). However, it is not clear what date that "remaining" figure relates to or how it relates to the figures in Table 5.1.

Q6.11 Is there a reasonable prospect that a total of 85 hectares of land (60 + 25) will be developed for industrial and warehouse uses on the allocations and other sites referred to in policy JE2 and Table 5.1 during the plan period?

Coventry's unmet need for local industrial and warehouse development land

NPPF 11 states that strategic policies should, as a minimum, provide for objectively assessed needs to be met other than in certain defined circumstances.

Policy DS1 refers to a local need in Coventry for 105 hectares of additional employment land. This is based on the Coventry and Warwickshire HEDNA - West Midlands Strategic Employment Sites Study Alignment Paper (September 2024) ("Alignment Paper") which identifies:

- A need for 105 hectares of land for industrial and warehouse uses on non-strategic sites in Coventry between 2021 and 2041⁸⁰.
- A need for between 9 ha and 84 hectares of land for industrial and warehouse uses on strategic sites⁸¹ in the relevant part of the West Midlands that includes Coventry and Rugby (M6 / A45 / A46 / M45) between 2021 and 2045⁸².

Whether those assessments of need are justified was considered under matter 2.

⁸⁰ EB10 Table 3.9.

⁸¹ EB10 para 1.5: Large scale employment sites typically over 25 ha and largely dedicated to units of over 9,000 sqm.

⁸² EB10 para 4.11: Area 7.

Policy DS1 part 3 states that it is not possible to deliver all of the 105 hectares needed in the city boundary. Paragraph 3.14 advises that there is a shortfall of 45 ha of land for local employment uses in Coventry (although the Council has proposed a main modification to this which we consider below under “Employment land windfalls”).

The Council's response to PQ18 advises that the Council contends that the application of NPPF policies that protect the Green Belt provides a strong reason for restricting the overall scale of industrial and warehouse development within the administrative area of the city.

Q6.12 Is the approach of not meeting Coventry's identified need for local employment land (105 ha) in full, and unmet need for strategic employment land in Warwickshire, justified and consistent with national policy?

Policy DS1 part 3 states that 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 to provide for Coventry's unmet need for land for industrial and warehouse development.

The Council's response to PQ19 clarifies that it 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 (although the shortfall could be less than that).

The Council's response to PQ20 advises the Council expect the need for up to 84 ha of land for strategic sites for industrial and warehouse uses to be met elsewhere in the area around the M6 / A45 / A46 / M45 and suggests that Rugby Borough Council is undertaking capacity assessment work to inform their local plan (which is expected to be published under regulation 19 early in 2026)

The Memorandum of Understanding between Coventry and the Warwickshire local planning authorities⁸³ 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.

Q6.13 Is there a reasonable prospect that Coventry's unmet local need for industrial and warehouse development, and the need for up to 84 hectares of strategic sites, will be provided for in the local plans elsewhere in the Functional Economic Market Area?

⁸³ CD9 Appendix 4.

Employment land windfalls

We agreed to accept an additional document entitled Employment Land Recycling Paper September 2025 (“Recycling Paper”) which was published on the examination website on 29 October 2025⁸⁴. However, the Council’s subsequent response to FPQ18.1 acknowledged that the Recycling Paper does not fully answer the question of what contribution existing employment sites might make to meeting the identified employment land needs over the plan period.

The Council therefore commissioned further work from its consultants who produced an Employment Windfall Paper which was published on 3 December 2025 along with a note with the Council⁸⁵. The Windfall Paper suggests that, based on past trends over the last ten years, an allowance of 3.9 hectares per year from 2028 could be made for employment development on windfall sites: a total of 35.76 hectares up to 2041. Based on that, the Council has proposed that policy DS1 part 1b be modified to refer to 96 hectares of employment land being provided in the city (rather than 60 hectares) and a modification to paragraph 3.14 to refer to a shortfall of 9 hectares (rather than a shortfall of 45 hectares).

Q6.14 (a) Is there compelling evidence to demonstrate that a total of around 36 hectares of employment land will be developed on sites not allocated in the Plan during the plan period? (b) If so, are the Council’s proposed modifications to policy DS1 and paragraph 3.14 necessary to make the Plan sound and would they be effective in that regard?

JE4 Location and type of office development

Policy JE4 part 1 states that office development should normally be sited within Coventry city centre and other defined town centres. Part 2 states that the Friargate site within the city centre is the preferred location of large scale office development. Mixed use allocation JE2.1 Friargate proposes a total of 27,100 sqm office floorspace.

Q6.15 Is there a reasonable prospect that a total of 27,100 sqm office floorspace will be developed on allocation JE2.1 Friargate in the plan period?

Q6.16 Are the requirements in policy JE4 parts 3 to 5 relating to office development outside the city centre and other defined town centres justified and consistent with national policy?

Q6.17 Is the requirement in policy JE4 part 6 for all new offices to be designed to allow for flexibility of internal layouts so that these can be altered to adapt to changing market conditions and the needs of users justified?

⁸⁴ PS1 published 29 October 2025.

⁸⁵ PS11 and PS11a.

Overall office land supply (Table 5.2)

The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA)⁸⁶ and Coventry Office Market Study 2024⁸⁷ identify a need for 8.5 hectares of land for office development in Coventry between 2021 and 2041 (based on labour demand modelling and including a flexibility margin). The Plan does not define the need for office development in terms of sqm of floorspace.

Policy DS1 part 2 states that a minimum of 41,200 sqm of office floorspace will be provided including 39,549 sqm on allocation JE2.1 Friargate (which policy paragraph 5.18 states comprises 12,449 sqm completed and 27,100 sqm proposed).

Table 5.2 in the Plan identifies the following components of office supply:

• Completions 2021-2024	22,299 sqm
• Commitments	24,940 sqm
• JE2.1 Friargate allocation	27,100 sqm
• Total	74,339 sqm

Q6.18 (a) To be effective, does the Plan need to be modified to define the need for additional office floorspace in sqm? (b) Does the Plan identify sufficient land to ensure that the identified need for additional office floorspace can be met over the plan period?

JE6 Tourism and visitor-related development

Q6.19 Is policy JE6 consistent with national policy and effective?

JE7 Accessibility to employment opportunities

Q6.20 Is the requirement in policy JE7 for all employment development proposals to demonstrate how job opportunities will be made accessible to the city's residents, particularly those in the most deprived areas and priority groups, justified, effective and consistent with national policy? In particular:

- Support to residents in applying for jobs (part 1c).
- Training opportunities (part 1d).
- Childcare provision (part 1e).
- Measures to assist those with physical or mental health disabilities (part 1f).
- Developer contributions (part 2).

⁸⁶ EB8.

⁸⁷ EB13D.

M7. Retail, town centres and Coventry city centre

The Coventry Retail and Centres Study (2024) includes research on shopping behaviour in the city; considers current and emerging market trends; quantifies the need for additional retail floorspace; and assesses the health of the city centre and other town centres⁸⁸. It identifies a need for a total of around 20,000 sqm of convenience (5,900 sqm) and comparison (14,300 sqm) retail floorspace by 2041 and more than sufficient capacity within existing town centres to accommodate this (including over 50,000 sqm of vacant floorspace in the city centre).

Q7.1 To be effective, does the Plan need to be modified to define the need for additional retail floorspace and set out where that need is expected to be accommodated?

R3 Town centre network

Policies R2 and R3 define a network of town centres:

- Coventry city centre
- Major district centres (3)
- District centres (8 plus one proposed)
- Local centres (22 plus two proposed)

The town centres, and primary shopping areas within them (other than in local centre) are designated on the policies map.

Q7.2 Is the network of town centres defined in the Plan justified and consistent with national policy? In particular, do each of the three “major district centres” have the characteristics of a “town centre” rather than an out-of-centre retail and leisure park?

R1 Delivering retail growth: proposed new district and local centres

Policy R1 proposes the development of a new district centre and two new local centres:

- Eastern Green district centre – up to 10,000 sqm including a range of retail and leisure uses.
- Eastern Green local centre – up to 1,000 sqm including small scale units providing a range of local community uses and top up provisions.
- Keresley local centre – up to 1,500 sqm including small scale units providing a range of local community uses and top up provisions.

Q7.3 Are the proposed new district and local centres justified and consistent with national policy? In particular:

- a) What is the justification for up to 10,000 sqm of retail and leisure floorspace as part of the Eastern Green mixed use development?
- b) Will the Plan be effective in ensuring the creation of a sustainable town centre at Eastern Green, rather than an out-of-centre retail and leisure park?

⁸⁸ EB27 and EB27A.

- c) Are the requirements for the provision of “small scale units providing a range of local community uses and top up provisions” at the two proposed local centres clear?

Development within town centres

Policy R3 states that the major district, district and local centres will be preferred locations for new shops and other main town centre uses that do not serve a city-wide catchment and refers to primary shopping areas within the major district and district centres.

Policy R5 allows uses not falling within Use Classes A and E in town centre ground floor units in certain defined circumstances.

Policy R6 states that restaurants, bars and hot food takeaways should normally be located within defined centres and sets out a number of criteria to be met.

Q7.4 Will policies R3, R5 and R6 be effective in helping to ensure the vitality and viability of the town centres? In particular:

- a) Is the approach to development within the primary shopping areas (as opposed to elsewhere within the defined centres) clear?
- b) Is the requirement for restaurants, bars and hot food takeaways to be “in accordance with the emerging Adopted Hot Food Takeaway SPD and any subsequent replacement” justified?

R4 Out of centre proposals

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 a defined centre”. 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.

The Council’s responses to PQ51 and PQ52 propose a modification to policy R4 intended to ensure consistency with national policy.

Q7.5 Is policy R4 relating to out-of-centre proposals justified and consistent with national policy (or, if not, would the Council’s proposed modification ensure the policy is sound)? In particular:

- a) The requirement in part 2a for a “sequential assessment” for all main town centre use proposals or any other use within use class E and F outside defined centres.
- b) The sequential approach in part 2b “where in-centre options are exhausted”.
- c) The reference in part 2c to “retail proposals close to centres which do not have a defined PSA”.
- d) The requirement in part 3 for an “impact test” for all main town centre use proposals outside defined centres over 1,000 sqm that could impact on the city centre.
- e) The requirement in part 3 for an “impact test” for all main town centre use proposals outside defined centres over 500 sqm that could impact on a major district centre.
- f) The requirement in part 3 for an “impact test” for all main town centre use proposals outside defined centres over 250 sqm that could impact on a district centre.

R2 and CC1A to CC1E Coventry city centre

The Council's response to PQ46 advises that policy R2 could be deleted from the Plan as it duplicates policy CC1(A) "Coventry City Centre – Development Strategy".

Q7.6. Is policy CC1(A) justified and consistent with national policy?

Policies CC1(B) to CC1(D) relate to green and blue infrastructure; drainage and flood risk; and environmental management in the City Centre. The Council's responses to PQ47 to PQ49 set out why it considers those policies avoid duplication or inconsistency with other thematic policies in the Plan and add detail specific to the City Centre.

Q7.7 Is policy CC1(B) justified and consistent with national policy and other policies in the Plan including GE1 (green and blue infrastructure), GE2 (green space) and GE4 (trees)?

Q7.8 Is policy CC1(C) justified and consistent with national policy and other policies in the Plan including EM4 (flood risk management) and EM5 (sustainable drainage systems)? In particular, is the requirement in part b for all proposals to produce a Flood Risk Assessment justified?

Q7.9 Is policy CC1(D) justified and consistent with national policy and other policies in the Plan including EM11-EM14 (renewable energy); EM6 (contamination) and EM15 (noise)?

Policy CC1 part E relates to various distinct "city centre character areas" which are indicated on a map in Appendix 9(f). The Council's response to PQ50 proposes that the character areas be designated on the policies map – the proposed changes are set out in PS12c.

Q7.10 (a) Is policy CC1(E) justified and effective? (b) Do the character areas need to be designated on the policies map and, if so, are the boundaries proposed by the Council justified?

M8. Communities and health and wellbeing

Q8.1: Is the detailed wording of Policy HW1, notably criteria 1a sufficiently clear and unambiguous so that the policy would be effective?

Q8.2 Is the requirement for all Health Impact Assessments to be in accordance with the SPD or any future equivalent, justified?

Q8.3 Is Policy CO2 justified and effective?

M9. Green Belt and green environment

GB1 Green Belt

Policy GB1 states that the city's Green Belt boundaries are defined on the policies map, and the Council confirmed⁸⁹ that no changes are proposed to them in this plan.

Q9.1 Is Policy GB1 Part 2 consistent with national Green Belt policy?

GB2 Safeguarded land in the Green Belt

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

The policies map indicates areas of "Safeguarded Green Belt".

Q9.2 Is the definition of areas of Green Belt land in Policy GB2 justified and consistent with national Green Belt Policy?

Q9.3 Does progress on the South Warwickshire Local Plan in combination with national Green Belt policy justify this policy?

GB3 Local Green Space

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

NPPF106 requires that Local Green Space is in reasonably close proximity to the community it serves, is demonstrably special to a local community and holds a particular local significance, and is local in character, not an extensive tract of land. NPPF31 requires that the preparation and review of all policies be underpinned by up-to-date information, which is adequate and proportionate.

Q9.4 Is the 2015 LUC Coventry and Warwickshire Joint Green Belt Study⁹⁰ still the justification for the identification of proposed areas of Local Green Space?

⁸⁹ PS3

⁹⁰ EB37

Q9.5 Is each of the proposed areas of Local Green Space justified and consistent with the criteria in NPPF105 and NPPF106?

Q9.6 The Green Space Strategy 2019-2024⁹¹ appears to be a corporate Green Space strategy. What then is its relationship to and influence on LGS designations, and the justification for them?

Q9.7 Given the purpose, role and scope of policies GE1 and GE2, does Policy GB3 serve a clear purpose and avoid unnecessary duplication?

GE1 Green and Blue Infrastructure

Policy GE1 will protect and enhance green and blue infrastructure, in recognition of the value of high-quality, well-connected and well-managed green infrastructure.

Q9.8 Is Green and Blue Infrastructure defined on the policies map? If it is not, is the policy effective without such a definition, particularly given the requirements of Parts 3, 4 and 5?

GE2 Green Space

Policy GE2 states that “development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless...”.

Q9.9 How is that value to be measured, such that the policy is clear, unambiguous and effective?

Biodiversity, Geological and Landscape Conservation

Policy GE3 states that “proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity.”

Q9.10 Should the Local Nature Reserves referred to in Policy GE3 be shown on the submission policies map for the policy to be effective?

Q9.11 Does Policy GE3 reflect the hierarchy of sites set out in NPPF185 and the mitigation hierarchy set out in NPPF186?

Q9.12 Given the statutory requirement for biodiversity net gain (referred to in §9.24), does this policy only then apply to development on sites not listed in Part 1, which otherwise have biodiversity or geological conservation value? Is the policy wording effective?

⁹¹ EB41

M10. Design and masterplanning

Q10.1 Is the wording of the criteria in Policy DE1 effective and positively prepared such that it could allow for landscape-led proposals, or proposals which reflect the legacy of architectural innovation in the City to be brought forward? If not, could the wording of Criteria 1 or 5b be amended to ensure that it is?

Q10.2 Is the wording of Criteria 3 of Policy DE1 effective and justified in requiring buildings in excess of 20m in height to be “informed by the guidance” of an SPD?

Q10.3 Is Policy DE2 justified, clearly written and unambiguous in its approach to the provision and maintenance of public art?

M11. Heritage

Q11.1 Are the heritage policies (HE1, HE2, HE3 and HE4) effective, justified and consistent with national policy in respect of the approach they take towards heritage assets? Is the terminology used clearly written and unambiguous?

Q11.2 In particular, is criteria HE2.1e consistent with national policy in NPPF209 and 211?

Q11.3 Is criteria HE2.4 consistent with national policy in NPPF207 and 208?

M12. Accessibility

Q12.1 Are the accessibility policies (AC1 - 7) effective, justified and consistent with national policy?

Q12.2 In particular, is the wording of criteria AC1.1 effective in requiring proposals to be in accordance with plans and policies which are not development plan documents?

Q12.3 What are the Mobility Credits referred to in Policy AC3?

Q12.4 Is the Plan clear and unambiguous about the definition of Mobility Hubs referred to in Policy AC5?

Q12.5 Is Policy AC6 justified and effective, given its reliance on other strategies and plans outside of the Council’s control?

M13. Environmental management

Climate change, water quality, flood risk, drainage

Q13.1 Is the wording of Policy EM4 effective, in particular with regard to detailed matters of flows, alleviation measures, the relationship of development to alleviation measures and finished floor levels?

The Housing Optional Technical Standards notes that tighter water efficiency standards for new dwellings can be justified in certain circumstances, including the Plan area being within a water stressed area. Policy EM1.c requires water efficiency standards which go beyond current building regulations.

Q13.2 Is the Plan area a water stressed area?

Q13.3 Is the evidence in documents Carbon Policy Evidence Report⁹², the Coventry and Warwickshire Stage 1 Water Cycle Study 2024⁹³ and the Coventry Local Plan Viability Report⁹⁴ adequate justification and evidence of the clear local need for development to meet a water efficiency target of 110l/pd in policy EM1 and EM6, which is an optional Building Regulations requirement?

Energy and carbon

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.

National planning policy expects the planning system to help shape places in ways that contribute to radical reductions in greenhouse gas emissions, including through the design of development. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

The Planning and Energy Act 2008 allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. However, such policies must not be inconsistent with relevant national policies and should use standards that are nationally endorsed.

The Written Ministerial Statement on local energy efficiency standards published on 13 December 2023 advises that changes to energy efficiency building regulations are planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continues to decarbonise. Compared to varied local standards, which can add cost and complexity, such nationally applied standards provide much-needed clarity and consistency for businesses to invest and prepare to build net zero ready homes. In that context, the Government does not expect local plans to set local energy efficiency standards that go beyond current or planned building regulations. Any planning policies that do propose higher energy efficiency

⁹² EB75

⁹³ EB77

⁹⁴ EB22 and EB23

standards should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures that development remains viable, and the impact on housing supply and affordability is considered; and the additional requirement is expressed as a percentage uplift of a dwelling's Target Emission Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).

Q13.4 Are the emissions rates and details set out in Policies EM11 and EM12 consistent with the Future Homes Standard and Future Buildings Standards?

Q13.5 Do the energy efficiency standards, notably the percentage improvements required over Building Regulations, in Policies EM11 and EM12 go beyond planned building regulations? If they do, then are the Climate Change Strategy 2024⁹⁵ and the Carbon Policy Evidence Report⁹⁶ the well-reasoned rationale required by the December 2023 WMS, and are they robustly costed and justified by the viability report⁹⁷?

Part 12 of Policy H6 states that a reduction in the requirements of Policy EM11 may be presented to maximise affordable housing delivery.

Q13.6 Given the justification for Policy EM12, is it justified to prioritise affordable housing delivery over energy efficiency?

Q13.7 What is the justification for Policy EM13 requiring the use of a specified assessment methodology (CIBSE) to achieve compliance with Building Regulations? Is the wording of the policy consistent with the reasoned justification at § 13.71 and is it therefore effective?

Q13.8 Is Policy EM14 justified or effective in its reference to RICS Guidance which may change in future?

Minerals and waste

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

The Council's response to PQ56 advises that there is no adopted minerals and / or waste DPD for the City. As the Council is the Minerals and Waste Planning Authority for the City, the Plan should be consistent with national policy for minerals and waste. The NPPF requires planning policies to facilitate the sustainable use of minerals and plan for a steady and adequate supply and safeguard sites for the transport, handling and processing of minerals and mineral products.

NPPF 20 states that strategic policies should make sufficient provision for infrastructure for waste management and the provision of minerals.

⁹⁵ EB80

⁹⁶ EB75

⁹⁷ EB22 and EB23

The NPPF identifies waste management as a strategic matter, and it is to be read in conjunction with National Planning Policy for Waste 2014 (NPPW)⁹⁸ which states that positive planning plays a pivotal role in delivering this country's waste ambitions and sets out a number of clear expectations for local plans.

NPPF 215 to 223 set out national policy aimed at ensuring that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. National guidance is set out in PPG ID: 27 (2014).

Information on waste is found in section 10, the table in section 12, Appendix 2 of the Infrastructure Delivery Plan⁹⁹ as well as in sections 3, 4, 5 and Appendix 5 of the Duty to Cooperate Compliance Statement¹⁰⁰.

Paragraph 13.34 advises that there are no anticipated active mineral sites that are being brought forward during plan period. Notwithstanding this, NPPF 216e expects local plans to safeguard existing, planned and potential sites for the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material.

Information on minerals is found in sections 4 and 5 of the Duty to Cooperate Compliance Statement¹⁰¹. This appears to include regional assessment of aggregate needs, imports and exports.

The Council's response to SPQ56.1, SPQ56.2 and SPQ56.3 indicates that the approach of the Plan to waste and minerals matters is coordinated on a regional scale, through the West Midlands Technical Advisory Body for waste matters, and a partnership with other West Midlands LPAs for minerals matters.

Q13.9 Are the Mineral Safeguarding Areas defined on the policies map justified by adequate and proportionate evidence?

Q13.10 Is the Plan justified in its approach to, and consistent with national policy on, minerals? Are the modifications proposed by the Council in document PM1 in response to SPQ56.1¹⁰² necessary and sufficient to make it so?

Q13.11 Is the Plan justified in its approach to, and consistent with national policy on, waste? Are the modifications proposed by the Council in document PM1 in response to SPQ56.2¹⁰³ necessary and sufficient to make it so?

In their response to SPQ56.3(a)¹⁰⁴ the Council states there are no sites for the transport, handling and processing of minerals; the manufacture of concrete and concrete products;

⁹⁸ [National planning policy for waste - GOV.UK](#)

⁹⁹ Doc Ref CD18

¹⁰⁰ Doc Ref CD9

¹⁰¹ Doc Ref CD9

¹⁰² IN2.2 and PS12

¹⁰³ IN2.2 and PS12

¹⁰⁴ PS12

and/or the handling, processing and distribution of substitute, recycled and secondary aggregate materials in the Plan area, and as such, there is no need to safeguard them in line with NPPF216.

Q13.12 Is the Plan effective, and consistent with national policy in NPPF216 without a specific policy approach to planned and/or potential sites for such uses?

M14. Other soundness and legal compliance issues

Q14.1 Are any modifications required to make the Plan sound or legally compliant that have not been addressed under matters 1 to 13?

End of Annex 3