

Coventry Local Plan Review

Regulation 19

Proposed Submission (Publication) Stage Representation Form (guidance note below)

Ref:

(For official use only)

Name of the Plan
to which this
representation
relates:

**Coventry Local Plan Review – Regulation 19 Proposed
Submission (Publication)**

**Please return to Coventry City Council in writing or electronically by 23:59 03
March 2025 email to planningpolicy@coventry.gov.uk, via our consultation portal
<https://coventrycitycouncil.inconsult.uk/system/home> or by post to Planning Policy
Team, PO Box 7097, Coventry, CV6 9SL**

Please refer to the following data protection/privacy notice:
www.coventry.gov.uk/planningpolicyprivacynote

Please also note that that a copy of your representation(s) will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and the Programme Officer. and that your representation(s) will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35). This includes publication on Coventry City Councils website (personal details will be redacted in line with the Privacy Notice).

This form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details***2. Agent's Details (if applicable)**

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title		
First Name		
Last Name		
Job Title		
(where relevant)		
Organisation	University of Warwick	Turley
(where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address		

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan Review does this representation relate?

Paragraph Policy EM1

4. Do you consider the Local Plan Review is:

	Yes <input checked="" type="checkbox"/>	No <input type="text"/>
(1) Legally compliant	Yes <input type="text"/>	No <input type="checkbox"/>
(2) Sound	Yes <input type="text"/>	No <input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes <input checked="" type="checkbox"/>	No <input type="text"/>

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

With regards to EM1 part h, the University does not consider this part of the policy to have been positively prepared or justified as its scope is ambiguous.

The uncertainty within EM1.h) relates to how much of a buildings lifetime emissions would need to be balanced to achieve net zero. Regulated operational carbon (as long as this relates to energy use) when applied to operational energy use is a well understood term and easily measured and can be calculated ,within reason, over a building lifetime, (as long as there is an agreed forward emissions factor data set provided). However, EM1h) adds in “*the need to address embodied carbon and waste*” without a great deal of supporting guidance.

Embodied carbon is often split into sub-categories (up-front, in use and demolition stage) with the two latter stages being very much an estimate at building design stage. A plausible interpretation of this requirement is that all future carbon emissions are calculated / projected for each year of a building lifecycle - both energy related and embodied carbon (noting that during the ‘In Use’ Phase this could mean the embodied carbon of a maintenance or refurbishment project and, if in scope, at the demolition stage some assumptions on demolition methods and re-use), and then all these calculated emissions are balanced by some undefined means to achieve net zero, either up

front or annually through a buildings lifecycle. To achieve this with any consistency across projects would require much greater guidance

EM14 1.a) states that a Whole Life carbon assessment should be carried out and reported – will this be part of the basis for achieving Net Zero (the balancing calculation?). EM14.2.(a). sets a target for a subset of embodied carbon emissions (A1-A5) – will this be the basis of the net zero calc? (if so, it misses waste?). The differences in these approaches could run to 1,000's of tonnes of emissions over the lifetime of a building and significantly impact the measures needed to achieve net zero. Furthermore, the University is not clear about the expectations of how and when net zero should be achieved - would this be over the life of the building, or front loaded?

The University is also unclear on what the recommended approach (to achieving net zero) might be where on site energy electricity generation (which will have a diminishing impact when displacing a decarbonising grid supply) or environmental removal (sequestration) is not feasible (it is becoming commonly accepted that some offsetting schemes are not as effective as original claims suggested).

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The University consider that greater guidance is required in Policy EM1 part h (and/or consistency with/cross reference to Policy EM14 is required) in order to explain how the achievement of net zero is to be calculated, in relation to embodied and regulated operational carbon.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

7. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

Please add any further comments relating to the SA report in the box below

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The University consider that given the size of their landholdings within Coventry and the impact this policy could have in the future, they should be represented in any discussions on Planning For Climate Change adaptation.

(Continue on a separate sheet /expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.