

## Coventry Local Plan Review

### Regulation 19

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

Ref:

(For official use only)

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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](mailto: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](http://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.**

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## Part A

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**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		

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**Part B – Please use a separate sheet for each representation**

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Name or Organisation:

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

Paragraph  Policy  EM12 parts 1a, 2a,  
2c, 4b, 5b,6a.

4. Do you consider the Local Plan Review is:

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

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.

The University consider that some elements of Policy EM12 as currently drafted make the Policy unsound.

Part 1a of the Policy requires a greater than or equal to 35 % improvement on Part L 2021. The University is concerned that achieving this level of improvement on some University development, which by its nature has to be heavily serviced due to the type of equipment it contains, will be incredibly challenging. Achieving these improvements on Part L emission rates is untested across all use classes. It is unclear whether these figures will necessitate the use of certain technologies (e.g. Ground Source Heat Pumps) that although are highly efficient, have also been shown to be technically and financially challenging.

Part 2 a of the policy states “*Positive weight will be given to applicants who can demonstrate the following absolute energy metrics:*” The University is concerned about the absolute figures expressed here. Total Energy use is not split into regulated and unregulated. A total (regulated plus unregulated) target of 65kWhr/m<sup>2</sup> would be a very challenging target for many use classes across the University - for example Research Intensive Facilities with high quantities of process or computing loads; densely populated student residences with high hot

water demands (relative to floor area); catering facilities and so on. The space heating demand (which is aligned to the Passive House standard) is also known to be challenging across several use classes (particularly areas with very high ventilation requirements that may be necessitated by research activities). The Passive House Institute is known to provide dispensation (relaxation) for certain use classes, and the University consider that Policy EM12 2a should also provide a similar dispensation.

The way this part of the policy is worded is not clear – it states that '*positive weight will be given to*' but does not state how proposals will be viewed if they cannot demonstrate the absolute energy metrics stated. Does this mean that such proposals would be refused?

Part 2c – The University supports water reduction but consider that the use of 'must achieve' in part 2c will create significant challenges for certain development by the University. The minimum for Outstanding provided in BREEAM New Construction V6.1 SD5079 is 2 credits. Achieving 4 credits begins to introduce the need for Greywater or Rainwater Harvesting and suggests 50% of WC or urinal flushing demand. If applied to a >100 bed en-suite student residence, for example, the volumes of grey and rainwater required here become significant, requiring storage and standalone treatment and distribution systems.

Part 4b – it is noted that part 4 states "*Where viable, all major development should seek to deliver the following on site renewable energy generation standards*". However, the University would raise concerns about section b of part 4.

The on-site renewable energy target in the pilot version of the UKNZBS for buildings in the Midlands is 40/kWhr/m<sup>2</sup> building footprint / yr. The target in part 4 b of Policy EM12this policy is more than double this.

To achieve 115kWhrs/m<sup>2</sup> footprint p.a for a building with significant rooftop plant is likely to require a further floor (an enclosed top floor plant room) or PV "roof" and buildings with lightwells on the upper floors possibly require supplementing in other locations. The University wish to understand why this target is proposed and would question the deliverability of this part of the proposed policy.

Part 5b – the University would welcome an explanation as to why the energy offset price is stated to be based on the cost of solar PV data, as wind generation is likely to be a lower cost.

Part 6a – The University already implement a performance method through construction, however, would question what is meant by the word 'assured' in this part of the policy. Does this mean assurance from a 3<sup>rd</sup> party? Given that the University is already implementing such methods, it would not support a requirement for this to be assessed by a 3<sup>rd</sup> party.

(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 a degree of flexibility/dispensation needs to be written into parts 1 a, 2a and 2c of Policy EM12 to ensure that specialised development, as is delivered within the campus by the University, does not have to achieve the blanket measures as currently set out by the proposed policy.

(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:

As set out in these representations, the University delivers specialised development, some of which, by its nature, will not be able, or it will create significant financial and viability challenges for the University, to meet the proposed targets and requirements as currently set out in Parts 1a, 2a and 2c of Policy EM12. The University consider it is important that they are represented in any discussions which take place between the Council and Inspector on this policy so that their interests and potential challenges this policy could create, are properly expressed and understood.

The University would also welcome being part of discussions in terms of clarifications on parts 4b, 5b and 6a as set out above.

(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.