



# **Coventry Local Plan Review**

Regulation 19 Consultation Response

February 2025

Prepared for:  
HGIT Central Coventry Limited

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Project Number:  
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## Coventry Local Plan Review

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## **Appendices**

Appendix 1 – Site Location Plan



# 1 Introduction

- 1.1 These representations have been prepared on behalf of HGIT Central City Coventry Limited as landowners of a large proportion of the Central City Industrial Estate on Red Lane as shown in **Appendix 1**; in response to the Council's Regulation 19 Local Plan Consultation March 2025.
- 1.2 These representations should also be read in conjunction with those submitted to the Regulation 18 Issues and Options consultation (September 2023) and the associated Call for Sites and Brownfield Register submissions also made on behalf of HGIT Central City Coventry Limited.



## 2 The Site and Surrounds

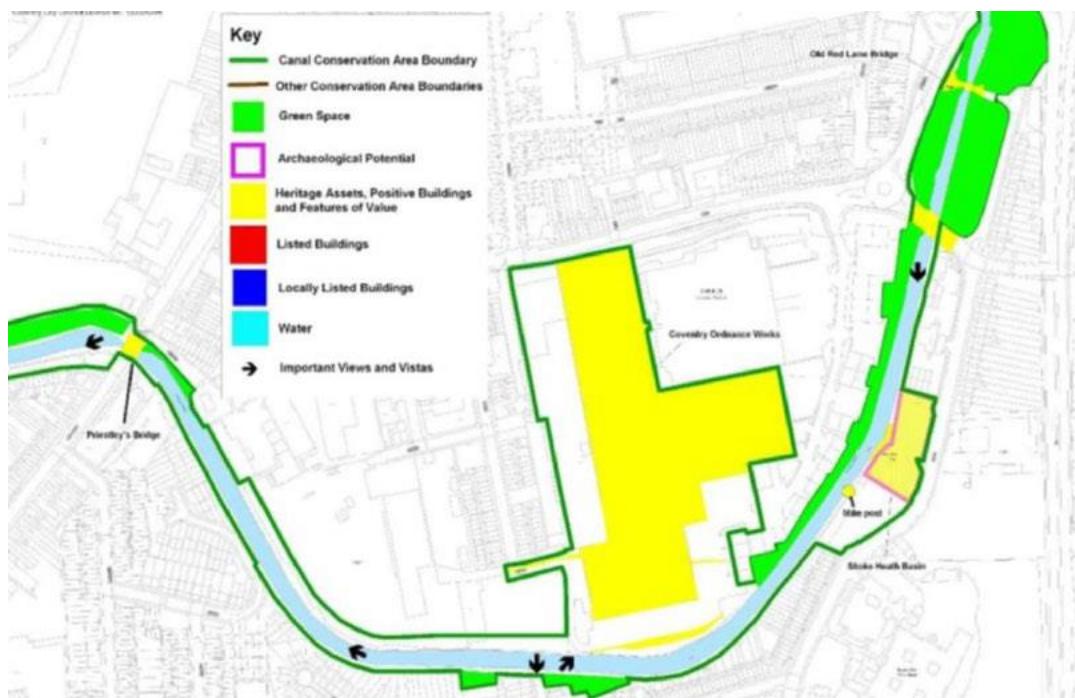
### 2.1 The Site

2.1.1 The area of the Central City Industrial Estate in the control of the landowner is shown in **Appendix 1**. It comprises five units of varying sizes which are generally in a poor condition. This is particularly so on the long, linear building running north to south across the Site which was part of the former ordnance factory.

2.1.2 At present, due to the condition of the buildings, and the Site's general arrangement, it is of limited attractiveness to businesses and employers. In short, the buildings do not meet the requirements of modern occupiers.

2.1.3 Existing landscaping within the Site is extremely limited, with the majority located around the periphery and non-planted. It therefore provides limited visual and ecological function.

2.1.4 The majority of the Site is located within the Coventry Canal Conservation Area as defined in the green lines below. Some buildings are also identified as 'Heritage Assets, Positive Buildings and Features of Value' and are highlighted in yellow on the below plan.



2.1.5 The Site is accessed via Red Lane with pedestrian and cycle access available by Smith Street to the west. The nearest bus stops are c.350m from the Site.

2.1.6 The Site is located within Flood Zone 1 and there are no wider environmental designations which are considered to preclude the sensitive redevelopment of the Site for employment uses.

## **2.2 Wider Context**

- 2.2.1 The north of the site is defined by Red Lane and existing residential, and community uses located beyond.
- 2.2.2 To the east of the Site is existing industrial/logistics uses, Coventry Canal and further afield a mixture of residential and commercial uses.
- 2.2.3 The Site is bounded to the south by Coventry Canal with residential uses and Fredrick Bird Primary School located to the south of the Canal.
- 2.2.4 Residential uses are located to the west of the Site along Smith Street which are effectively contained within an island between the Site and other commercial and community uses.
- 2.2.5 Coventry Canal is understood to be a Local Wildlife Site. Furthermore, the Site is well located in terms of access to the A444 and M6.



### 3 Evidence Base Review and Comments

#### 3.1 Employment (Jobs and Economy) Background Paper – November 2024 & Associated Evidence Base

3.1.1 The Coventry HELAA 2023 and 2024 provides a technical assessment which seeks to identify land which is suitable, available and achievable for housing and economic development over the plan period. The HELAA reviews the Central City Industrial Estate within the landowner's control (Site Ref: FOL-0050-23), to which we have the following comments on the review:

- The Site would be available within 1-5 years rather than 6-10 years as suggest by the Council.
- The capacity of the Site has been significantly under estimated. The capacity could be up to 35,000 sqm GEA if fully and sensitively redeveloped.
- Concerns have been raised about the potential high risk of contamination. However, it should be recognised that any redevelopment of the Site represents an opportunity to 'clean up' contamination rather than negatively weigh against redevelopment.

3.1.2 We welcome the reports support for the preference of employment generating uses on the Site and that it should be considered suitable for continued employment use. It is our view that this should follow through to a positive employment designation for the Site.

3.1.3 DLP Employment Land Review (August 2024) builds on the HELAA evidence base and considers that Central City is one of two sites which have been identified as suitable for employment uses. Development of the Site is however again significantly under-estimated as outlined above.

3.1.4 DLP has carried out site assessments as part of their report based on a set of criteria and assessments. The goal of this is to assess the existing employment plan, to determine whether the land is of sufficient quality to serve the city's economic needs over the Plan period.

3.1.5 The DLP review has not taken account of the previous submissions of the landowners, for instance, they consider that the Site is in no need of immediate investment and the condition of the Site is 'strong'. As previously outlined and evidence provided at Regulation 18, the Site requires a significant investment to just address its structural issues, regardless of whether it is actually attractive to modern occupiers.

3.1.6 The DLP report also focuses too heavily upon expansion potential within the Site, rather than redevelopment opportunities that the Site presents. Whilst the report believes the Site is largely fully let, it does not mean that its uses deliver maximum economic benefit. For instance, the occupiers of the large linear building running north to south is a pallets business who employment limited number of staff and have a low economic output in comparison to the forms of businesses who may take on modern, sustainable premises.

3.1.7 The DLP report does help to demonstrate though that the Site is relatively free from constraints and that it would serve the economic strategy for Coventry by providing a mix of unit sizes.

3.1.8 Overall, we welcome the recognition that the Site is considered available, suitable and achievable within the Plan period. However, the evidence base has failed to grapple with the significant opportunity to redevelop the Site sensitively and bring it into full economic use delivering on the Local Plan vision, economic strategy for Coventry and One Coventry Plan. We believe the evidence base means the plan is not properly justified as it has not appropriately considered the contribution that brownfield sites can make to addressing objectively assessed needs for employment uses.



### 3.2 Heritage Background Paper (November 2024) and Coventry Canal Conservation Area Appraisal (July 2012)

3.2.1 Whilst the Canal Conservation Area Appraisal has been in force for some time, we believe it requires an update following recent research, and the following comments are made specifically in relation to the area covering or impacting upon Central City Industrial Estate.

Appraisal Statement	Response
<p><i>The buildings and structures adjacent to the canal reflect the industrial and social history of Coventry and include motor factories, ribbon-weaving mills, cycle factories, chemical works and munitions factories. Many of these buildings are of special architectural and historic importance and are nationally significant.</i></p>	<p>The section within which Central City Industrial Estate lies along the canal has less historic/architectural significance, and perhaps less special interest overall. There has been heavy loss of its historic buildings and the buildings now lining it are mainly C20 housing. Whilst there are 'many' nationally significant buildings along the canal the Former Naval Gunshed (within the Site) is not one (there are many buildings in the conservation area that are more significant, and this section of the conservation area does not include any at all). The Former Naval Gunshed doesn't contribute to the setting of/for a group with any of these 'many' listed buildings and its setting is degraded, this being one of the more heavily changed parts of the conservation area and setting to the canal.</p> <p>This section on the conservation area has no listed buildings and no locally listed buildings.</p>
<p><i>The early 20th century saw established industries such as brick making at Great Heath expand while other new industries established themselves alongside the canal such as the Coventry Ordnance Works on Red Lane (Fig 4) and Courtaulds Artificial Fibres on the Foleshill Road. Further north Coventry Corporation established its gasworks at Longford that was dependent on the regular deliveries of coal from the canal. The spread of industry was accompanied by a massive expansion in house building for the growing workforce with the remaining green fields left between the canal and factories being rapidly in-filled with streets of terraced houses. The expansion of the city's industry continued during the inter-war period with established Coventry firms like Courtaulds and Alfred Herbert machine tools...</i></p>	<p>This is a multi-phase history of the active use of the canal, which begins in the 1760s and is described as continuing until the interwar period. The Site was established in only one phase of this, and one that was not necessarily the key phase in the canal's history or even in the history of its industrial use.</p>

<p><i>The Naval Gun Shop is one of Coventry's last surviving iconic industrial buildings and it is likely to be the only building of its kind in Britain. It is therefore of high historic and architectural interest. The site is now part of the Central City Industrial Estate and a series of small industrial units have been built alongside the canal. The backs of the units are positioned close to the edge of the canal but are fairly well screened by a narrow belt of woodland.</i></p>	<p>The building has a degree of interest due to its exceptional size when built and to its potential rarity as a surviving naval gunshed. Whilst it has not yet been confirmed that this is the only 'building of its kind' (i.e. naval gunshed?) surviving in Britain it is likely that very few survive.</p> <p>The interest associated with this is, however, primarily historic. The building has only a very limited, and specific, architectural interest, which is derived primarily from its substantial scale. There is some very low level of associated interest in its steel frame, which was sufficiently well designed and constructed to support a building of this scale, but which also shows no evidence of ingenuity, craftsmanship or technical innovation and has no known association with any named architect or foundry. The building around this frame is not architectural in its design, materials or construction, being a simple utilitarian cladding of glass, corrugated metal sheeting and brick and has, furthermore, undergone repeated changes, with comparatively little original or historic fabric surviving. Internally and externally, the building shows no evidence of the processes undertaken in the building, or the plant used, and has no known association with any invention or technological innovation in ordnance production, or any special identity as the inventor or unique manufacturer of a particular gun. It also has only very limited surviving fixtures, fittings or features – which do not extend beyond the cranes at ceiling, the rails in the floors, and occasional floor mountings, which give only a very limited insight into the manufacturing processes carried out, the building otherwise having been stripped out. The evidential potential of the building – its potential ability to provide additional information beyond that available in the historic photographs – is, therefore, very limited.</p> <p>Based on this, reference to Historic England's listing guidelines suggests that the building does not have the architectural or historic interest, age, or rarity to meet the statutory criteria for listing, which state that even buildings 'of special historic interest' 'should normally' have 'some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing'. As such, the building's interest cannot be deemed as high, particularly its architectural interest.</p>
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3.2.2 Further, there is no overall statement of significance explaining why the canal as a whole has special interest/character or what this is, to allow the contribution of site to this to be assessed. However, a list summarises the background of the canal in history, ecology, green infrastructure, transport, and the canal art trail. Of these five, the area of Central City Industrial Estate within the conservation area contributes only to historic interest.

3.2.3 It is also not clear why the Council has not added the Former Naval Gunshed to its local list, given the claims the Council make about it within the appraisal. This part of the canal is one with less historic interest, less green value, and fewer buildings of (designated/non-

designated) interest. Only the Former Naval Gunshed and its railway lines, Stoke Heath Basin and its bridge and Freeman's Bridge (i.e. the canal infrastructure itself, plus this one building) are identified as Other Heritage Assets, Positive Buildings and Features of Value.

- 3.2.4 This conservation area appraisal should be revisited to ensure it is not arbitrarily preventing redevelopment of brownfield sites within the city or overstating and failing to properly assess the contributions of sites to the conservation area.



## 4 Local Plan Review – Consultation Response

### 4.1 Strategic Considerations and Policies

4.1.1 It is recognised that the Local Plan Review is not a new plan and therefore the importance of keeping matters proportionate. The comments are therefore made in relation to the proposed changes in the 'Local Plan Review Proposed Policy Updates and Changes Guidance Note' summary matrix and matters which we believe should also be addressed which have not.

4.1.2 Critically the above matrix only addresses the specific policies and not necessarily the wider text throughout the Local Plan itself.

4.1.3 The landowner supports the ambition of the Local Plan Review to help deliver the vision, aims and objections of the One Coventry Plan. The One Coventry Plan recognises some key challenges within Coventry, despite recent successes, including:

- Economic growth and prosperity lag behind the England average, with fewer people in employment when compared to the regional and national average.
- Although improvements have been made, there remains pockets of deprivation which limit people's opportunities to succeed. 7% of the working age population have no qualifications, limiting their ability to gain more rewarding employment, or for them to be redeployed as the economy changes.

4.1.4 Economic redevelopment of sites such as Central City Industrial Estate can play a key role in addressing the three priorities the One Coventry Plan sets out:

- **Increasing economic prosperity of the city and region:** Central City Industrial Estate is currently significantly under-utilised due to the design and age of the building. As such, it fails to, and will continue to fail to, help raise economic prosperity without comprehensive redevelopment.
- **Improving outcomes and tackling inequalities within our communities:** As the industrial estate is located within an area of deprivation, but significantly under-utilised, it fails to bring the Site into full economic use which would have wider benefits for the community (ie: employment, skills and training, etc).
- **Tackling the causes and consequences of climate change:** Due to the age and condition of the buildings on the industrial estate they fail to address climate change but also are unattractive to businesses in the future who could lead the green industrial revolution.

4.1.5 All of the above points from the One Coventry Plan, demonstrate the clear narrative to ensuring under-utilised employment land, particularly within areas of deprivation, are supported for redevelopment to capture their full economic, social and environmental benefits.

4.1.6 Central City Industrial Estate is one such site which has been left unallocated by the Council despite the economic evidence identifying it as appropriate for economic development and the potential for it to address the City's economic strategy.

4.1.7 Policy DS1: Overall Development Needs – has been updated based upon up-to-date evidence bases. This focuses primarily on the need to generate new, additional floorspace for economic uses. However, it does not account for the need to ensure that existing floorspace is modernised to meet the ambitions of the green industrial revolution for the city. It is important that this strategic policy recognises that the quality as well as quantum of floorspace is required to meet the broader objectives of the Plan.



- 4.1.8 Policy DS3 should be strengthened to include opportunities for skills and training, economic growth and tackling deprivation and poverty so it better aligns with the Local Plan ambitions and the One Coventry Plan.
- 4.1.9 More widely, the National Planning Policy Framework at paragraph 124 requires policies to ensure that objectively assessed need is addressed in as much as possible through previously developed or 'brownfield' land. A search of the Local Plan Review documents shows references to brownfield land primarily around residential development. The plan fails to consider how employment needs can also be met through modernising and redeveloping existing employment sites, improving quantity and quality of space.
- 4.1.10 The Sustainability Appraisal discussed brownfield land but again this is primarily in relation to residential development. It does not appear to consider redevelopment of brownfield economic land for the same uses to bring them back into full employment and economic benefit.

### 4.2 Economic Policies

- 4.2.1 Generally, the landowner supports the proposed amendments to the Policy JE1 in particular, the clear links to the One Coventry Plan, Economic Development Strategy and the Climate Change Strategy. They also support the strengthened wording around sustainable and green technologies. However, the policy wording should be added that supports the modernisation and re-development of existing employment stock to bring sites back into full economic use which ensures the best use of existing brownfield sites.
- 4.2.2 We suggest that Policy JE2 is amended slightly to outline that the 52ha of land for employment development does not include strategic B8 requirements. Whilst, supportive of the recognised need for employment land and the need for a balanced portfolio of sites, it is not just a quantum of space issue, it also relates to the quality of spaces.
- 4.2.3 Poor quality spaces which cannot be redeveloped for full potential will mean that the Council will be unable to properly implement their vision of a green revolution, employment and skills improvements and full economic outputs. As such, we believe the policy could be updated to be supportive of redevelopment of existing sites already in employment use where their quality of space is considered to be poor and preventing the ambitions of the Plan being realised.
- 4.2.4 Policy JE5 focuses on employment development on non-allocated sites, The presumption is considered acceptable where it meets a list of criteria under points 2 and 3. Point 2 should be updated to consider the existing impact of onsite uses already. 2.c. appears to have a typo and therefore it is not clear what this limb seeks to achieve.

### 4.3 Heritage Policies

- 4.3.1 This section sets out our views in relation to Policy HE2: Conservation and Heritage Assets, particularly in relation to its alignment with the National Planning Policy Framework. The following points are of note.
- 4.3.2 Policy HE2.1 in effect states that places, spaces, structures and features on the Historic Environment Record are, or should be treated as, non-designated heritage assets. However, it's worth noting that there are some 2,797 'places, spaces, structures and features' in Coventry's HER – including simple former 'sites of...' demolished structures, and that these have presumably not been assessed individually.
- 4.3.3 Policy HE2.4 gives a strong promotion of re-use of heritage assets (more directly than the National Planning Policy Framework) and it should be recognised that there may be numerous barriers to the 'sympathetic and creative re-use of heritage assets'. Siting, form, scale, mass, design, materials and detailing all pose substantial barriers to a re-use that would be economically sustainable and provide for the ongoing care and conservation of the building. There may also be substantial barriers in terms of carbon sustainability, with implications for HE2.4. The policy should be amended to more closely reflect national policy in this regard.



4.3.4 Policy HE2.4 notes that the reuse of embodied energy (aka carbon) 'contributes to sustainability'. This may have very limited application to some buildings, particularly those which do not contain any organic materials. Some buildings, such as those on the Central City Industrial Estate are in the main poor quality, with a short design life and expected use when constructed. Again, on buildings such as those at Central City, the materials have already undergone repeated replacement, alteration and repair which has created a patchwork of general poor materials reaching the end of their life and requiring placement. The materials of the envelope are also often sufficiently poor as to have little thermal performance, either resulting in a high operational energy (offsetting any saving in embodied energy through their retention) or requiring the application of further materials in addition, reducing any carbon benefits. Retrofitting would require substantial embodied carbon emissions in order to achieve substantially reduced operational carbon emissions, whilst still bringing the buildings into only partially viable operation. This needs to be recognised within the policy and by decision makers.

### 4.4 Proposed Site Allocations

- 4.4.1 We believe that Central City Industrial Estate should be allocated as a redevelopment employment site rather than left as 'white land'. The employment policies as currently written would potentially allow for a range of uses to come forward on the Site, with no particular presumption in favour of certain uses. This is despite the evidence base itself, and the Council through engagement, having made clear that the Site is considered to be one that is important to delivering employment uses within the city and meeting its wider strategic objectives.
- 4.4.2 However, the Site itself does not meet the demands and needs of modern-day occupiers (eaves heights, structures, yard space, etc), nor will they attract businesses associated with a green industrial revolution due to poor energy performance.
- 4.4.3 Due to the significant costs associated with upgrading the buildings on Site and them still not being attractive to the market, we believe that an allocation could positively presume redevelopment of the Site in a sensitive way that considers the history of the Site whilst also balancing the significant economic and social benefits its redevelopment could bring about.



## 5 Summary and Conclusions

5.1.1 These representations have been prepared on behalf of HGIT Central City Coventry Limited as landowners of a significant proportion of the Central City Industrial Estate on Red Lane, as shown at **Appendix 1**.

5.1.2 These representations should also be read in conjunction with those submitted September 2023 and the separate Call for Sites information provided.

5.1.3 The landowner is broadly supportive of the vision being set out by the Council as part of the Local Plan Review. However, we believe that whilst this vision is admirable, there are concerns which have been raised in relation to employment and the economy, particularly when considering how plans should be examined under paragraph 36 of the National Planning Policy Framework. These include:

- Concerns around whether the plan is appropriately justified.
- Consistent with national policy – particularly in relation to heritage policy and ensuring that brownfield land is prioritised for redevelopment for employment generating uses. Sites such as Central City Industrial Estate have not been appropriately considered as to how they can help meet the objectively assessed need for employment uses. Nor has the quality of wider stock within the city been fully considered, and how this helps meet the Plan's wider ambitions.

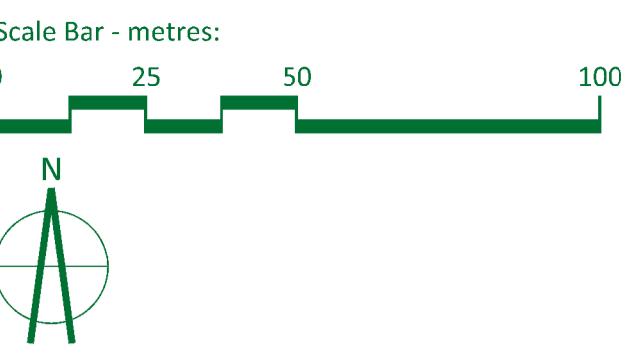
5.1.4 The Landowner reserves the right to participate in the Examination process including during in person hearing sessions. Should the Policy Team have any questions, we would be happy to discuss these.



## Appendix 1 – Site Location Plan



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Drawing Status:  
PRELIMINARY ISSUE FOR COMMENT

**CMP**  
Architects  
Client  
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Project  
Coventry, Central City Industrial Estate

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