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Chapter 1 - Introduction

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
National Highways (ID36)	Para 1.7 – evidence base		Y		N	Statement of Memorandum of Understanding A Statement of Memorandum of Understanding (MoU) was agreed in 2019 between NH and CCC under the Duty to Cooperate requirements of the Localism Act 2011. The aim is to provide a position statement for both parties in respect to the Local Plan 2041. Underlying the MoU is a commitment to work together with CCC to facilitate necessary transport infrastructure and support the housing growth identified in the plan. <i>Model agreement and Transport Evidence Base</i>	<u>Transport Evidence Base</u> As outlined in our response above, we are currently unable to make a judgment on the soundness of the Local Plan until we have been provided with further information in relation to the transport evidence base. <u>A46 Coventry</u>	Noted and the matters raised discussed with NH Noted. Discussions ongoing with CCC transport team and NH regarding updated modelling (CSMT) report due September 2025 update	No change proposed but will be confirmed pending discussion with NH.

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						The MoU between CCC and NH confirms that the Coventry Area Strategic Model (CASM) is the existing model agreed to date (previously agreed in June 2019). This will however be replaced by the Coventry Strategic Modelling Tool (CSMT), although it is noted that the CSMT was not available within the timeframe needed to support the Local Plan. The model is expected to serve as an appropriate basis to understand the cumulative impact of the Local Plan growth and strategically assess the transport impacts of the Local Plan. The relevant parties should continue to work together to assess specific impacts in more detail and agree the outcomes of the modelling, which will later determine the required interventions/ mitigations to support the proposed growth without resulting a significant impact on the SRN. NH previously advised that once the preferred development strategy was chosen, we would need to review the impacts in regard to the	<u>Junctions (Walsgrave) Scheme</u> As stated above, the A46 Coventry Junctions (Walsgrave) DCO scheme (TR010066) was accepted for examination in December 2024. Should it be granted consent, the Scheme will provide much needed improvements to the A46 and provide benefits to the SRN and surrounding local road network. National Highways would like to clarify a	to be provided to the EiP. Walsgrave junction was included and this has been agreed with NH.	

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						SRN and discuss the infrastructure requirements, we are unaware of this being done to date and we fail to agree on the proposed transport model as we have seen no evidence to support growth demands up to 2041, which has been validated from our side. We would like CCC to confirm the existing transport model which supports the growth demands up to 2041, as well as the evidence showcasing how this has been validated. Sensitivity tests can be provided with the background information on how the previous CASM model which we validated in 2019 based on a 2013 base year to support the previous local plan has transformed into the current model which supports the updated local plan. It is our understanding that the technical note from November 2024 has been used as a placeholder to give an overview of the CSMT based on the CASM modelling to showcase the potential impact on the network for 2041.	number of points in the Local Plan, in relation to the Scheme: Officer Note: Refer to their table in the original submission response form, it is too large to replicate here.		

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						NH has now been made aware that the CASM will be replaced by CSMT, although it is noted that the CSMT, has not been reviewed by NH and we have not been involved in any discussions and development of the model update. We would therefore need to gain a clear understanding on what has been done to date and to what extent does it include the SRN network and the potential impact before we agree on the methodology and consider the potential impact on the SRN network along the M6 and A46. We are currently unable to make a judgment on the soundness of the Local Plan until we have been provided with further information in relation to the transport evidence base. It is also noted the A46 Coventry Junctions (Walsgrave) Scheme has not been included within the coded within the CASM 2041 Baseline (Table 1 - transport-modelling-technical-note). The Scheme currently has allocated funded through the Road Investment			

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						Strategy 2 (RIS2), and the Development Consent Order (DCO) application currently is in the pre-examination stage, with a decision on the DCO expected in 2026. In addition to this, the potential of Walsgrave Hill Farm (site ref. H2:3) in close proximity to the SRN, the Council are encouraged to consider adding the A46 Coventry Junctions (Walsgrave) Scheme. National Highways are also willing to supply any information or data to allow this, due to the advanced stage the project.			
Stantec on behalf of HGIT Central Coventry Ltd (ID57)	Chapter 1 –1.3 (One Coventry Plan)			N	Y	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.	Respondent: 'Please refer to representation'.	Noted. The site has not been allocated as it is an existing long established employment site. However, it is acknowledged that the site	Potential for including in updated employment supply calculations, discussions ongoing with FEMA partners. No change to policy wording but local employment supply and shortfall

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						- 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		could well be more effectively utilised for employment purposes to better contribute towards a changing local economy and could be counted in supply as an opportunity for recycling / modernisation .	references could be adjusted.

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						fails to bring the Site into full economic use which would have wider benefits for the community (ie: employment, skills and training, etc). • Tacking 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			

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						development and the potential for it to address the City's economic strategy.			

Chapter 2 – the Vision

Respo ndent / organi sation / agent	Secti on	Compli es with Duty to Cooper ate Y/N	Lega lly Com plia nt Y/N	Sou nd Y/N	Does respon dent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Stride Treglo wn on behalf of Covent ry univer sity (ID61)	Chap ter 2 2.1- 2.5	Y	Y	Y	Y	The University Group supports the policy intent of the replacement Local Plan to address wide-ranging issues linked to climate change as set out in Table 2.1 (pp9 - 12). The University Group responded to the Coventry City Council Climate Change / Sustainability Consultation exercise in May 2023. That representation expanded upon the approach taken by the University Group, referencing issues such as the Green Flag International Award, National Transport Design (Research) Centre, the University Group's Centre for Agroecology, Water and Resilience, the Centre for Trust, Peace and Social Relations, the development of a National Skills Hub aimed at supporting Power Electronics, and strategic	No modifications are sought. This representation is made in the interests of creating a positive, justified and effective plan, and to seek ongoing collaboration with the Council to share best practice and promote joint initiative, while potentially benefitting from academic research undertaken locally.	Noted	No change

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						partnerships such as with Jaguar Land Rover to develop pilot training schemes to upskill 1,200 engineers linked to electric vehicle development. The May 2023 representation confirmed that the University Group considered the Council's draft Sustainability Strategy to be a good start in tackling climate change. The University Group agreed with the main pathways identified and that they cover the key areas for tackling climate change. Support was offered in relation to the identification of skills within the strategy as being a key factor in establishing Coventry as a green leader. The University Group welcomed the opportunity of working with the Council to tackle climate change in Coventry and promoting the city as a green healthy place to live, study and work. The University Group wishes to work with the Council and share the emergence of Sustainable Development and Movement			

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						Principles being generated by the University Group. The University Group is committed to reduce carbon emissions, increase recycling and reduce waste, enable sustainable decisions to be embedded within procurement strategies and ensure impacts are legally compliant. The University Group has developed an up-to-date Travel Plan and Transport Strategy Action Plan in 2023. These align with the key objectives of consolidating initiatives and streamlining Travel Plan coordination duties. Linked to wider space utilisation, estate optimisation strategy, Building Condition Surveys and Remedial Works Programme, the University Group is developing a Decarbonisation Strategy across its Estate. This will develop previous thinking as captured in its Sustainability (Climate Change Commitments) Strategy.			

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						The University Group will wish to work with the Council to share best practice in monitoring and implementing effective sustainable principles across the City. Collaborative working in developing policy and knowledge exchange in relation to initiatives such as renewable energy priorities and promoting of EV charging and heat networks is supported.			
Natural England (ID37)						The Plan's vision and strategy Natural England advises that the Plan's vision and emerging development strategy addresses impacts and opportunities for the natural environment. We note the aspiration to protect and enhance the environment and move towards a zero carbon economy. Policies Natural England generally accepts the rationale behind the policies within your plan.		Noted	No change
Oxalis on behalf of Hallam	Vision 2.1		N	N	Y	'The Vision' section (section 2) of the Local Plan is supported. Paragraph 2.1 and table 2.1 set out that Coventry city Council will create: "a city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are	Reasons for non-compliance in relation to supporting policies, and suggestions for modifications are set out in following 'Part	The policies are considered to support the vision.	No change

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Land (ID46)						enabled to innovate and grow and new local jobs are created.” (our emphasis in bold). Hallam support this approach, however detailed policies DS1, DS2, JE1, JE2, and GB1 do not support this vision, and result in the plan being unsound and not legally compliant for reasons set out in the additional submitted ‘Part B’ forms and attached written representations document. This is supported by a review of the Employment evidence base by Savills titled: Industrial and Logistics (I&L) Needs Assessment February 2025. Officer comment: See complete representation for additional information.	B’ forms, and an attached written representations document.		

Chapter 3 - Overall Levels of Growth and the Duty to Cooperate

Policy DS1 - Overall Development Needs

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Define Planning & Design Ltd on behalf of	DS 1	N	Y	N	Y	<u>Programme to Adoption and Plan Period</u> The Regulation 19 Plan sets out a plan period of 2021-2041. The December 2024 Local Development Scheme sets out a timetable following the current consultation of submission of the Plan for examination between April-June, examination in July September and adoption in October-	The plan period must be extended to ensure at least 15 years remain on adoption. The Council must revisit its housing requirement, and	The plan period aligns to the evidence base. The timetable is not considered to be overly	No change

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William Davis Homes (ID14)						December. This is an overly ambitious and unrealistic timetable to adoption, especially given the fundamental soundness concerns with the Regulation 19 Plan raised in these representations. This will undoubtedly lead to a sub-par and unsound Local Plan being submitted for examination. The Government has been clear that deficient Local Plans should not be submitted for examinations where significant time and resource during the examination will be needed to “fix it” (Matthew Pennycook MP, July 2024). There are significant concerns with the approach the Council are taking to identifying and meeting its housing need, and considering unmet needs elsewhere. It is a real prospect that the Plan will be found unsound without substantial work during the examination to “fix it”. If allowed to continue through examination, the modifications and evidence work that will be needed will undoubtedly lead to a significant slip in the programme. This clearly would not comply with the acceptable	consider any unmet needs from neighbouring authorities. The Council must consider all options to deliver the employment needs of the area, including reviewing whether sites allocated for housing could be allocated for employment, and the substitution of these housing sites by the release of Green Belt to provide a better range and mix of housing as further discussed in response to Policy H2.	ambitious: the LDS will be updated prior to submission to illustrate some minor slippage and this will show that there will still be a 15 year period from adoption in line with the NPPF. The Council fully understands the importance of housing hence the reason it intends to deliver its need within its own boundaries	

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						approach to examination as set out by Matthew Pennycook MP: <i>“pragmatism should only be used where it is likely a plan is capable of being found sound with limited additional work to address soundness issues [...] pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall”.</i> It is important to note that NPPF paragraph 22 requires strategic policies to look ahead over a minimum 15 year period from adoption. With a plan period of 2021 – 2041, any delay in the programme could lead to non-compliance with the NPPF. As discussed above, the timetable is considered to be unrealistic, particularly given the soundness issues with the Plan particularly in relation to meeting housing needs. As such, the plan period should be extended to ensure it is compliant with national requirements, and the Plan is positively prepared and effective in identifying		using a brownfield first approach which aligns with the NPPF. It is also understood that the Standard Method is a minimum starting point and indeed the proposed need figure for Coventry at 1455 dpa is higher than the new standard method (2024) at 1388 dpa. The exceptional circumstances are set out in	

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						and supporting the delivery of much needed housing. The proposed strategic policies should be reviewed on this basis, which includes the housing requirements and the site allocations needed to meet these. <u>Housing needs</u> There is a significant national housing crisis in the Country, which is recognised by all political parties. The current Government has set a target to deliver 1.5 million homes over the next five years to begin to address the significant shortfalls in housing nationally. Therefore, at the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10). NPPF paragraph 11 requires all plans to meet the development needs of their area. Further, that strategic policies, should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas unless the circumstances set out at 11b i or ii apply.		the HEDNA and the growth needs background paper. In terms of affordable need this is set out in the HEDNA. Not all of this need comes from new build, but the need to maximise delivery is understood. The viability assessment has considered this matter and a more detailed explanation is	

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						Paragraph 60 further emphasises the importance of delivering a sufficient amount and variety of land, where it is needed and that the overall aim should be to meet as much of an area's identified housing needs as possible. Paragraph 61 states that the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. This must be read together with the Planning Practice Guidance (PPG) which stresses that the standard method provides "a minimum starting point in determining the number of homes needed in an area". NPPF paragraph 61 does allow for an alternative approach, where there are exceptional circumstances. However, PPG emphasises that an alternative approach will be scrutinised more closely at examination and any other method (to the standard method) will be used only in exceptional circumstances. Indeed, other authorities including Oxford City Council and Tandridge District Council have come undone at examination where they		set out in the response to representations on Policy H6	

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						have proposed an alternative approach without the appropriate evidence to support exceptional circumstances and contribution to unmet needs under the Duty to Co-operate. RPS produced a “Coventry & Warwickshire Housing Needs Report” on behalf of South Warwickshire Consortium, submitted with representations to the Regulation 18 Plan. The Council has not appropriately addressed the significant issues it raised, and it remains relevant, particularly in relation to the Council having failed to demonstrate exceptional circumstances (Paragraph 3.35). Importantly, RPS states that “whilst the alternative approach results in higher housing need in some areas, it will not meet the full needs of the HMA. This runs the risk of under-supply (and not a boost in supply) of housing, which could result in worsening affordability of housing and a reduction in the provision of affordable housing to meet the needs of those households on lower incomes”.			

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						NPPF paragraph 61 also requires any needs that cannot be met within neighbouring areas to be taken into account in establishing the amount of housing to be planned for. Whilst it may be the case that the standard method has now changed with publication of the NPPF 2024, the Council has chosen to trigger the transitional arrangements and therefore will be examined under the NPPF December 2023. As such, the housing requirement should be based on the previous standard method with uplift applied. A review of the evidence base published to support the Regulation 19 Plan does not adequately demonstrate exceptional circumstances to support the deviation from the standard method, nor does it sufficiently consider contributing to potential unmet needs from neighbouring authorities. Even if exceptional circumstances applied, the urban uplift must be applied to the alternative housing figure to comply with the NPPF and the national aims and			

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						ambitions for housing delivery in the most sustainable and populous areas. Further, the Council has not sufficiently demonstrated that any unmet needs from neighbouring areas have been considered, or the impact of the new NPPF on those authorities has been appropriately considered. The Duty to Cooperate Statement itself highlights that <i>“Through Issues and Options and subsequent discussions at CSWAPO, Coventry has always been clear that it would be proceeding with a housing need number from the HEDNA which reflected local need but did not include the 35% cities uplift”</i>. Additionally, it notes that <i>“Coventry has always been clear that it did not expect any partners to deliver the cities uplift either as it would be arguing against this through the Local Plan process”</i>. This clearly highlights that the Council has never taken a positive approach to the Local Plan Review and has never intended to appropriately consider meeting the requirements set out in the NPPF 2023.			

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						The Council's approach has failed to incorporate sufficiently the housing needs of the area, particularly in relation to appropriately addressing affordable housing needs. The HEDNA 2022 states that Coventry has the lowest median income of all authorities in the HMA and has a significant number of households in overcrowded housing, homeless/concealed households and households in need totalling 15,273 households. It finds a net need for social/affordable rented housing in Coventry of 1,887 dwellings per annum (941 for newly forming households) and a net need for affordable home ownership of 149 dwellings per annum. This has not been addressed by the Council either in selecting an appropriate housing requirement, or allocating sufficient or appropriate sites capable of delivering affordable housing to the level required. In fact, Policy DS2 part 2 states that <i>"to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities</i>			

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						<i>to secure opportunities for Coventry citizens to access affordable homes within Warwickshire". Whilst it is acknowledged that such a significant need may need cross-boundary working, the Council have failed to first review all reasonable options to deliver affordable housing within the Coventry area and have failed to provide any reassurance that these needs can and will be met within the wider HMA.</i> If departing from the Standard Method and uplift, the total annual need for affordable housing must be reviewed. At present, the Plan and its evidence base fails to comply with national policy, including PPG which sets out that: <i>"The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may</i>			

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						<i>need to be considered where it could help deliver the required number of affordable homes”.</i> When reviewing the sites proposed for allocation, the majority of the allocations will only deliver 10% affordable housing, or commuted sums in lieu and may not deliver any if viability continues to be an issue for the majority of the allocated sites. Further, as set out in these representations and those in response to policies H1, the Councils approach will not only fail to deliver the number of homes needed, but also the size, type and tenure (NPPF paragraph 63) including the 2 and 3 bedroom homes referenced by the Council at paragraph 6.7 of the Regulation 19 Plan. Affordable housing needs will clearly not be met, and the Council have not taken a positive approach to attempt to meet these needs. The failure to appropriately consider its needs and meeting those needs, appears to be an ongoing approach by the Council who also has not met its employment needs and the Duty to Cooperate			

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						notes this is an outstanding issue that has not yet been resolved. Indeed, it is clear that the Council has not adequately considered releasing Green Belt sites for residential development and freeing up other suitable sites for employment development. Fundamentally, it is clear that the Local Plan Review has not been prepared positively, the alternative approach proposed has not been adequately justified, it is not effective (particularly with regard to meeting its own needs and working on cross boundary matters) and it is not consistent with national policy. Therefore, the Plan is not sound and significant amendments must be made before the Plan is submitted for examination.			
Marrons on behalf of Richborough (ID31)	DS 1	No response	No response	N	Y	Policy DS1: Overall Development Needs – Plan Period <u>Not Sound</u> 1. Policy DS1 is not positively prepared, justified, or consistent with national policy.	Policy DS1 1. should therefore be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing affordability in the City and a contribution to unmet needs	The plan period aligns to the evidence base and it is normal practice to have a plan period which has a	No change

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						2. Policy DS1 1. defines the Plan period as 2021-2041. The Local Plan will not be adopted until at least 2026, five years into the Plan period. There is no justification for a Plan period that starts five years before the Plan is adopted, and there is no support for adopting such an approach in the NPPF or NPPG. 3. NPPF paragraph 21 requires strategic policies to look ahead over a minimum 15 year period. There is no requirement for strategic policies to also look backwards 5 years. 4. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement. 5. Policy DS1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351	from Birmingham and the Black Country. 41. Policy DS1 4. should be amended to be consistent with paragraph 33 of the NPPF.	retrospective start date. The council is not trying to avoid meeting its needs at all, indeed significant work has been undertaken to ensure it can wholly meet its own OAN as set out in the HEDNA and this figure at 1455dpa is higher than the new standard method of 1388 dpa.	

Local Plan Review

Regulation 19: Summary of Representations

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						completions¹. Therefore, there were 2,986 completions in excess of the proposed Local Plan requirement (7,351 - 1,455 x 3). The inclusion of supply between 2021-2024 means that the housing requirement for the 15 years ahead from 2026-2041 will not be met (total capacity 31,493² – 2,986 = 28,507 which is less than the minimum of 29,100 homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected. 6. The December 2023 NPPF paragraph 60 clearly states the Government's objective is to significantly boost the supply of homes. That has not changed with the change in Government. By adopting a Plan period that looks back 5 years, the Council is manipulating the figures to avoid meeting the housing needs of the City.		The Council considers it will have a clear 15 year time period from adoption in line with the NPPF and will amend the LDS prior to submission to clearly demonstrate this. The Council's justification for its need figure is set out in the growth needs	

¹ Table 5 of the HELAA November 2024

² Total projected completions up to 2041 in Appendix 3 Housing Trajectory

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Regulation 19: Summary of Representations

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						7. Further to the above point, Policy DS1 1. only plans to 2041. NPPF Paragraph 22 is clear that Local Plans should look ahead over a <u>minimum</u> 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged. Policy DS1: Overall Development Needs – Housing Requirement 8. Policy DS1 1. also specifies the minimum housing requirement as 29,100 (1,455 dpa). This is based on the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022), minus 10,180 dwellings (509 dpa) based on removing 35%. The removal of 35% is a reference to the 'urban uplift' which should be applied to the Local Housing Need calculation using the		background paper. In terms of the employment figures these have been updated through the alignment paper In terms of affordable housing this has been informed by viability work, see also reps to Policy H6. In regard to the comments about meeting the needs of the	

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Regulation 19: Summary of Representations

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						Standard Method, and not the HEDNA method of calculating housing need. 9. Whilst the HEDNA approach to determining the appropriate level of housing growth to be planned for in Coventry is considered acceptable in principle, concerns are raised relating to the future job growth forecasts used in preparing the HEDNA being unduly pessimistic. 10. The HEDNA uses the Cambridge Econometrics (CE) March 2021 baseline economic growth forecast. This forecast was prepared during the COVID-19 lockdown when economic growth was far from certain and was informed by uncertain economic conditions. The CE forecast is for 0.44% per annum growth (820 jobs per annum) in Coventry over the CLPR Plan period, less than the 1.0% per annum growth (equivalent to 1,995 jobs per annum) experienced since 1981, and growth of over 2% per annum between 2011 and 2019 (3,338 jobs		Greater Birmingham Housing Market Area, Coventry is a constrained city which sits within a different HMA and this is not considered to be a reasonable approach.	

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						per annum). The CE forecasts were also based on 3.6% GDP in 2021 and a 2.8% increase in GDP in 2022. Reference to the ONS' December 2022 GDP monthly estimate report states how GDP is estimated to have grown by 4.0% in 2022, following growth of 7.6% in 2021. 11. Furthermore, the HEDNA identifies how 551 hectares of logistics floorspace is needed across the housing market area to 2041. However, the location for this land has not been confirmed and so the job growth associated with it has not been considered. 12. As a minimum, 1.0% growth since 1981 should be assumed, which aligns with the 1,964 dwellings per annum established by the HEDNA and emphasises how the housing requirement of 1,455 dwellings per annum is inadequate. 13. It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The			

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Regulation 19: Summary of Representations

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						HEDNA derived figure of 1,964 dwellings per annum represents the <u>minimum</u> number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with national guidance³; for example in order to address a significant affordable housing shortfall, support economic development or address strategic infrastructure requirements which are likely to increase the number of homes needed. 14. The HEDNA describes affordable housing need across the HMA as “<i>clearly acute</i>” and identifies a “<i>notable need</i>” for affordable housing. It also states how it is clear that provision of new affordable housing is an “<i>important and pressing issue in the area</i>”. Figure 8 of the AMR 2023/24 shows that 2,933 affordable homes have been delivered since			

³ Paragraph: 010 Reference ID: 2a-010-20201216 of National Planning Practice Guidance

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Regulation 19: Summary of Representations

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						2011 compared to a Local Plan requirement of 4,176 dwellings for the same period. 15. The HEDNA calculates <i>significantly higher</i> affordable need in CCC of approximately 2,000 affordable dwellings per annum. This reflects the Council's waiting list (over 13,000 households), a 68% increase in the number of households in temporary accommodation in only 24 months, a 114% increase in only five years in the number of households who are homeless and owed a relief duty, and the fact that Coventry has the 12th highest ratio of homeless households per 1,000 population of over 300 local authorities in England. 16. Addressing affordable housing need in any meaningful way will require an uplift to the HEDNA's calculation of 1,964 dwellings per annum. 17. Further consideration should also have been given to unmet needs within and adjacent to			

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Co-operate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						the Housing Market Area in line with the Duty to Co-operate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan and which are not addressed within the Duty to Co-operate Statement. <i>Birmingham and the Black Country</i> 18. There are strong functional relationships between Birmingham, the Black Country and Coventry, in terms of transport connections and commuting patterns, and development in Coventry can contribute towards meeting unmet needs. Whilst Coventry has historically not been seen as part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), Coventry was recognised within the HMA Strategic Growth Study commissioned by the local authorities as being			

Local Plan Review

Regulation 19: Summary of Representations

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						a location that could contribute to addressing unmet needs given its strong functional links. 19. The most recent GBBCHMA Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings arising from the GBBCHMA with total contributions of only 18,181 dwellings committed. However, this is now out-of-date on account of Local Plan progress and revisions to the calculation of Local Housing Need derived from the Standard Method. Work is underway to update the Position Statement to 2025. <i>Birmingham</i> 20. There are strong functional relationships between Birmingham and Coventry and the relationships across the wider area should be understood including the relationship between homes and jobs as a Functional Economic Market Area.			

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Regulation 19: Summary of Representations

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						21. It is recognised that the shortfall arising from Birmingham is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum given the Local Housing Need derived from the Standard Method has decreased to 4,448 dwellings per annum. Indeed, based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Birmingham Local Plan period 2020 to 2042 and comparing with reported supply in the Birmingham Local Plan Preferred Options (July 2024), the shortfall arising from Birmingham will have been eradicated. <i>Dudley</i> 22. The Dudley Local Plan was subject to Regulation 19 consultation in October and November 2024. It reports a housing need of 11,169 dwellings in the Plan period 2024 to 2041 with supply of 10,470 dwellings, resulting			

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Regulation 19: Summary of Representations

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						in a shortfall of 699 dwellings to be exported through the Duty to Cooperate. 23. It is noted that the housing requirement is based on the Local Housing Need derived from the previous Standard Method of 657 dwellings per annum; this has now increased significantly to 1,462 dwellings per annum. 24. Should the Dudley Local Plan be submitted for Examination before 12th March 2025 it will be captured by the transitional arrangements set out in the NPPF and able to continue on the basis of the lower Local Housing Need derived from the previous Standard Method. However, should the Dudley Local Plan not progress to Examination before 12th March 2025, the Council will be required to utilise the increased Local Housing Need derived from the Standard Method for plan-making. Based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Dudley Local Plan period 2024 to 2041 and comparing			

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						with reported supply in the Dudley Local Plan Publication Plan (October 2024), the shortfall arising from Dudley would increase to some 14,384 dwellings. <i>Sandwell</i> 25. The Sandwell Local Plan was submitted for Examination in December 2024. It reports a supply of 10,434 dwellings compared with a housing need of 26,350 dwellings in the Plan period 2024 to 2041, resulting in a shortfall of some 15,916 dwellings to be exported through the Duty to Cooperate. 26. It is noted that Sandwell's Local Housing Need derived from the Standard Method has marginally reduced from 1,550 dwellings per annum to 1,346 dwellings per annum, however given the stage of preparation of the Sandwell Local Plan it is captured by the transitional arrangements in the NPPF. In any case, the shortfall in supply in Sandwell is significant.			

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						<i>Walsall</i> 27. Further to the disbandment of the Black Country Plan in late 2022, Walsall Council have not yet made notable progress on a new Local Plan, with Issues and Options consultation is expected in 2025. Given the shortfall reported in the Black Country Plan and the increase in Walsall's Local Housing Need derived from the Standard Method since (now 1,148 dwellings per annum), it is likely that there will continue to be a shortfall arising from Walsall that requires consideration. <i>Wolverhampton</i> 28. The Wolverhampton Local Plan was subject to Regulation 19 consultation in November 2024 to January 2025. It reports a housing need of 19,728 dwellings in the Plan period 2024 to 2042 with supply of 9,330 dwellings, resulting			

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						in a shortfall of some 10,398 dwellings to be exported through the Duty to Cooperate. <i>Contributions to Shortfall</i> 29. The GBBCHMA Position Statement Addendum outlines contributions towards unmet needs committed at April 2023, however several of these commitments have now fallen away or been reduced. 30. 2,665 dwellings contribution from Lichfield are noted in the Position Statement Addendum, however the Lichfield Local Plan was withdrawn in October 2023. Initial work on a new Local Plan has commenced and was subject to Issues and Options consultation in October to December 2024. The Issues and Options document confirms commitment to the Duty to Cooperate but does not set a commitment to meeting unmet needs arising from the GBBCHMA.			

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						31. 1,500 dwellings contribution from Shropshire are noted in the Position Statement Addendum. Whilst this is still maintained, the Shropshire Local Plan Review is currently under scrutiny at Examination with significant soundness concerns raised by the Inspectors. There is therefore potential for the Shropshire Local Plan Review to be withdrawn and the committed contribution to unmet needs to disappear. 32. 2,105 dwellings contribution from Solihull are noted in the Position Statement Addendum, however the Solihull Local Plan Review was withdrawn in October 2024, with no progress yet made on a new Local Plan. 33. 4,000 dwellings contribution from South Staffordshire are noted in the Position Statement Addendum, however this has been reduced to 640 dwellings in the South Staffordshire Local Plan submitted for Examination in December 2024.			

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						34. The net result of the above is a reduction of some 8,130 dwellings in commitments to unmet needs arising from the GBBCHMA, with a further 1,500 dwellings committed also potentially falling away. 35. It is noted that the Telford and Wrekin Local Plan Review will be subject to Publication consultation from March 2025 and includes a commitment to 153 dwellings per annum towards unmet needs arising from the Black Country, however the total level of unmet needs to be met is not clear and it remains untested through Examination. <i>Conclusion on Unmet Needs</i> 36. Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum, the shortfall is still significant. In addition, the level of			

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						committed contributions towards unmet needs has decreased. 37. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry in the Duty to Co-Operate Statement. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF. 38. Policy DS1 1. should therefore be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. Policy DS1: Overall Development Needs – Review Mechanism			

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						39. Separately, Policy DS1 4. fails to state that the Council will review its Local Plan policies within 5 years of the date of adoption, and therefore is not consistent with the NPPF paragraph 33 or the expectation within the Levelling-Up and Regeneration Act 2023 where Plans should be in place within 5 years of the previous Plan being adopted. Further, paragraph 33 requires strategic policies to be updated if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. This is not reflected in the criteria a-d. under 4. in DS1. 40. Policy DS1 4. should be amended to be consistent with paragraph 33 of the NPPF.			
Marrons on behalf of Catesb	DS 1	Y	Y	N	Y	Plan Period Policy DS1 1. defines the Plan period as 2021-2041. The Local Plan will not be adopted until at least 2026, five years into the Plan period. There is no justification for a Plan period that starts five	- The Plan Period should be updated to 2024 to 2042 1,964 dwellings per annum should be utilised as a starting point for the housing	The plan period aligns to the evidence base and it is normal practice to have	No change

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y Estates (ID27)						years before the Plan is adopted, and there is no support for adopting such an approach in the NPPF or NPPG. NPPF Paragraph 21 requires strategic policies to look ahead over a minimum 15 year period. There is no requirement for strategic policies to also look backwards 5 years. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement. • Policy DS1 1. only plans to 2041. NPPF Paragraph 22 is clear that Local Plans should look ahead over a minimum 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged. Housing Requirement • Whilst the HEDNA approach to determining the appropriate level of housing growth to be planned	requirement, plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. • Policy DS1 should be revised to state the Council will review the Local Plan within five years from adoption.	a plan period which has a retrospective start date. The Council considers it will have a clear 15 year time period from adoption in line with the NPPF and will amend the LDS prior to submission to clearly demonstrate this. The Council's justification for its need figure is set out in the	

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						for in Coventry is considered acceptable in principle, concerns are raised in the submitted Housing Need Evidence Base Review relating to the future job growth forecasts used in preparing the HEDNA being unduly pessimistic. As a minimum, the Housing Need Evidence Base Review considers that the 1.0% growth since 1981 should be assumed, which aligns with the 1,964 dwellings per annum established by the HEDNA and emphasises how the housing requirement of 1,455 dwellings per annum is inadequate. It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure of 1,964 dwellings per annum represents the minimum number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with NPPF Paragraph 67, in particular with relation to high levels of affordable housing need as established through the HEDNA.		growth needs background paper. In regard to the comments about meeting the needs of the Greater Birmingham Housing Market Area, Coventry is a constrained city which sits within a different HMA and this is not considered to be a reasonable approach.	

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						• Further consideration will also need to be given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35c) of the NPPF. • Policy DS1 1. should therefore be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. Review Mechanism			

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						Policy DS1 4. fails to state that the Council will review its Local Plan policies within 5 years of the date of adoption, and therefore is not consistent with the NPPF Paragraph 33. Further, NPPF Paragraph 33 requires strategic policies to be updated if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. This is not reflected in the criteria a. to d. under 4. in DS1.			
NBBC (ID44)	DS 1	N	No response	N	Y	Nuneaton and Bedworth Borough Council (NBBC) has worked with Coventry City Council (CCC) on a range of cross boundary strategic matters in accordance with the Duty to Cooperate. The NBBC Borough Plan Review (BPR) is at an advanced stage of preparation with the Regulation 19 Examination in Public hearings undertaken in July to October 2024. <i>Housing</i> Policy DS1: Overall Development Needs identifies a need for 29,100 homes. The need is determined	CCC should engage with neighbouring authorities to assess the capacity to accommodate the employment land shortfall generated by the preferred approach. The South Warwickshire Local Plan is undertaking a Preferred Options consultation which identifies a site, 'MIS.4 - South of Coventry area' which is said could contribute towards	Comments are noted and further discussions are ongoing across the FEMA including an MoU and the production of Statements of Common Ground.	DtC discussions ongoing to establish the extent of supply and shortfall and an update will be provided to the EiP and modifications to the figures

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						from the 2021 Coventry & Warwickshire HEDNA. Given the relationship between local authorities within the Coventry & Warwickshire Housing Market Area, a consistent approach provided by the HEDNA is supported. <i>Employment</i> Policy DS1: Overall Development Needs identifies a need for 105 ha of employment land (including qualitative replacements). The policy sets out that 60 ha of employment land can be found within the CCC administrative area. The 60 ha comprises of existing allocations, commitments and completions. As the HEDNA and Alignment Paper consider the Plan period starting in 2021 it is logical that completions which occur post 2021 and commitments which have yet to deliver should be included in the supply. NBBC is therefore supportive that these sources of supply are included in the overall supply position. The policy states that it is not possible to deliver additional employment land within the CCC	Coventry's unmet need. North Warwickshire Borough Council has commenced work on an Employment DPD which is anticipated for submission late 2024/early 2025. Rugby Borough Council has commenced a review of its Local Plan completing an Issues and Options consultation. NBBC believes that authorities in the FEMA are well placed to comment on the achievability of the CCC approach regarding meeting its employment land need. Statements of Common Ground will help to establish if the need can be met.		in the plan may be sought accordingly.

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						administrative boundary and the shortfall will be met through the Duty to Co-operate. NBBC has recently undertaken a 'Call for Employment Sites' exercise. Of those received one site was located outside of the Green Belt. One 6 ha site was submitted which is located outside of the settlement boundary to the north of the Borough and would potentially serve as extension to the proposed MIRA south site. The MIRA site is a regional employment site and so would not serve the local employment needs of Coventry. The second site submitted outside of the Green Belt poses significant deliverability issues. The NBBC Call for Sites exercise establishes that there is no suitable employment land in the Borough which matches CCC preferred approach to allocate non-Green Belt sites. CCC has selected a preferred approach towards development to protect all Green Belt and to address the shortfall through the Duty to Cooperate. CCC has not engaged with NBBC to understand the availability of land to meet unmet			

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						need that has been generated by the preferred approach. NBBC contends that without understanding the availability of land in neighbouring authorities or the wider sustainability impacts of dispersing local employment need, CCC preferred approach is flawed. The approach towards employment need is not positively prepared as there is no understanding of capacity to accommodate Coventry's employment land need in neighbouring authorities. The shortfall is deferred to other Local Plans or through Review Policies. NBBC believes that CCC should, in the first instance, provide for its locally derived need within CCC administrative boundaries. NBBC contest that it is not possible to find additional employment land supply within the city boundary – see Policy JE2. <i>Duty to Cooperate</i> This is a Regulation 19 consultation and represents the last stage of public engagement before submitting the plan to the Planning Inspectorate to			

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						appoint an independent Inspector to undertake Examination in Public (EiP). The purpose of this stage and subsequent examination is to consider whether the Plan complies with the legal requirements, the Duty to Co-operate and whether the Plan is legally compliant and meets the tests of 'soundness' set out in the NPPF paragraph 35. <i>Housing DtC</i> CCC has worked with other Local Authorities in the Housing Market Area on the Coventry and Warwickshire HEDNA. CCC confirms it is able to meet all of its housing need within its administrative boundaries. Therefore, no approach has been made to neighbouring authorities to assist with unmet housing need. <i>Employment DtC</i> CCC have worked with other authorities in the FEMA to establish an evidence base for employment needs. The West Midlands Strategic Sites Study (WMSESS) provides the need for regional strategic sites. Coventry is identified as an			

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						Opportunity Area within the WMSESS along with NBBC and Rugby BC (WMSESS). The prioritised junctions identified in the report are located within Rugby BC administrative area. CCC should seek to formalise the findings of the WMSESS through a Statement of Common Ground. The sub-regional HEDNA provides employment land and sets out a figure for each local authority in the subregion. CCC has adopted a strategy to protect Green Belt sites and rely on neighbouring authorities to help meet any unmet need. CCC has not engaged with neighbouring authorities to assess if sufficient non-Green Belt sites are available, or if there are suitable Green Belt sites. There has been no groundwork regarding the achievability of the approach which could be formalised through a Statement of Common Ground. In the absence of any work being undertaken on Statements of Common Ground on such a fundamental issue the Regulation 19 consultation is premature.			
Nurton Develo	DS 1 &	No response	No response	N	Y	This representation concerns the employment land policy elements of Policy DS1 – principally Items 1b, 1c and 3.	For the reasons set out in our response to Question 5, NDL considers the following	The evidence is considered to be robust, as is	No change as a result of the proposals put

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Nurton Developments Ltd (ID45)	Paragraphs 3.10-3.15					Nurton Developments Limited (NDL) welcomes the acknowledgement under Item 3 that it is not possible to deliver all of the identified need for employment land within the City's boundaries. NDL welcomes further that the Council commits to work with its neighbouring authorities to ensure that these needs are met elsewhere within the Functional Economic Market Area. However, NDL is concerned that the draft Plan, and associated evidence, under-estimates the need for employment land for Coventry and its sub-region and over-estimates the ability of current supply to meet this need. Item 3 refers to a local employment land need for Coventry of 105 ha over the period 2021 to 2041. This need excludes the need identified for big box units on strategic employment sites. This is dealt with separately (and covered by our representations in respect of paragraph 5.14 of the draft Plan).	changes are necessary to make Policy DS1 sound: - - Item 1b – a “<i>maximum</i>” of 60 ha to replace a “<i>minimum</i>” of employment land to meet local needs. - Items 1c – remove reference to Baginton Fields. - Item 3 - “<i>211.5 ha</i>” of employment land to replace “<i>105 ha</i>” to meet Coventry's local employment land needs for the period 2021 to 2041. Associated changes should be made to paragraphs 3.14 and 3.15, as follows: - - Paragraph 3.14 – “<i>maximum of</i>” to be inserted before “<i>60 ha</i>”. - Paragraph 3.14 – “<i>shortfall of 45 ha</i>” to be replaced by	the existing Baginton Fields allocation. There may be some adjustments to the local supply and shortfall figures as DtC discussions are ongoing with FEMA partners. Using the term ‘maximum’ is not considered appropriate in terms of employment supply as the situation is complex and constantly evolving.	forward here albeit in terms of supply and shortfall figures these may change slightly as a result of ongoing DtC discussions.

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						As at 31 March 2024, the current supply of employment land (excluding that proposed to contribute to big box need – see below for more details) is 60.2 ha (reference Table 5.1 of the draft Plan). This equates to a shortfall of 45 ha (reference paragraph 3.14 of the draft Plan). The need for 105 ha was projected by the Coventry & Warwickshire HEDNA – West Midlands Strategic Employment Sites Study (WMSESS) Alignment Paper. This study, produced in September and updated in November 2024, seeks to align the findings of the Coventry & Warwickshire HEDNA (November 2022) and the regional wide WMSESS (September 2024). All three studies were produced by the consultants Icen. Previously, the 2022 HEDNA identified a need for industry and non-strategic warehousing for Coventry of 147.6 ha over the same period. This is 40% greater than the need projected by the Alignment Paper. The corresponding reduction to 105 ha in the Alignment Paper does not seem to be	<i>“minimum shortfall of 151.5 ha”.</i> - Paragraph 3.15 – removal of the second sentence which refers to Baginton Fields. - Paragraph 3.15 – removal of <i>“further”</i> in the last sentence.		

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						credible and is not explained or commented upon by the draft Plan or associated evidence. Nor is it supported by the most recent data on take-up or market commentary. Table 5.1 of the draft Plan provides a breakdown of the components of local employment land supply (i.e. excluding the big box market). It is provided below for ease of reference. The top line refers to completions of 25.4 ha over the three years from April 2021 to March 2024. This breaks back to 8.5 ha per annum. Projected over 20 years – the plan period – this would derive a base need of 169 ha (i.e. 8.5 x 20). The HEDNA adds a margin of flexibility equating to five years' take up. Adopting the same methodology, this would add a further 42.5 ha (i.e. 8.5 X 5) to the base need (of 169 ha) and give a total projection of need of 211.5 ha. Assuming a supply of 60 ha, this represents a shortfall of 151.5 ha. NDL contends that this figure would be a much more robust and positive basis for the City Council			

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						to plan the economic strategy for the sub-region with its neighbouring local authorities. It would also align much better with market sentiment, as reported by the Employment Land Review (SPRU – August 2024). This study refers to: - • A low industrial vacancy rate of 3.17% suggesting high demand and constrained supply (paragraph 0.3). • Stakeholders reporting growth in the warehouse and distribution sectors and a shortage of small and medium-sized units (paragraph 0.4). • The importance of collaborating with neighbouring authorities to manage land availability constraints (paragraph 0.8). Item 1b of Policy DS1 refers to a minimum of 60 ha to be provided to meet local needs. NDL considers this should be a maximum, rather than a minimum, figure. Principally, this is due to the constrained nature of Coventry, with a densely built-up conurbation surrounded by a collar of Green Belt. As such, there is very limited opportunity for new windfall sites to come forward during the plan			

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						period. In addition, some identified sites in the supply may not be delivered because of site constraints, lack of availability, or competing interest (e.g. housing). According to Table 5.1 of the draft Plan, 25.4 ha of the overall supply of 60.2 ha has already been completed (as at March 2024). This leaves a residue of just 34.8 ha for the remainder of the plan period. Item 1c of Policy DS1 refers to 25 ha being provided at Baginton Fields to contribute to the subregional need for big box development. It should be noted that this site is already counted as part of the committed supply by WMSESS and the Alignment Paper. As such, if delivered, it will not contribute to meeting the residual need of 136 ha – 311 ha for the sub-region identified by paragraph 5.14 of the draft Plan. In any event, the site is clearly not deliverable for a number of reasons, as follows: -			

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						• It was allocated in the 2017 adopted Coventry Development Plan but has yet to come forward for development. • It is heavily constrained by existing uses. These include a primary school and separate playing fields which would require relocation. • It contains a large woodland and a designated Local Nature Reserve. • Completion of the wider road improvements (to serve Coventry Gateway and JLR at Whitley) has fettered the access options for the site. The only feasible access would be through third party land and crossing the River Sowe. • Part of the site lies in the floodplain to the River Sowe. There seems to be no appetite from the principal landowners (including the third party) to take this site forward. Despite being allocated for 8 years, no planning application has been submitted. No marketing has been undertaken either. NDL does not see this site being delivered and it should be			

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						de-allocated and removed from the figures provided for supply			
MSP+D Ltd (ID35)	DS1 and Paras 3.10-3.15	N	N	N	Y	The submitted Regulation 19 Coventry City Council Local plan policy DS1 “overall Development Needs, bullet points 3 and 4, are not legally compliant, sound or comply with the Duty to co-operate because: 1. Local Plan Review – Duty to Co-operate Statement. Page 11 of this document states that: <i>“As with Housing, the HEDNA was the starting point for assessing employment need. However work was also ongoing across the wider West Midlands region in terms of assessing strategic site (ie ‘big box’) needs as this has different site and locational requirement to local employment provision. The West Midlands Strategic Employment Sites Study (WMSESS) was finalised in September 2024, the result of a partnership of those authorities</i>	To make the Coventry City Regulation 19 Local plan sound, the following changes are required to the submitted Reg 19 Coventry City Plan. 1. At least 45 hectares of land for employment use needs to be also allocated outside Coventry’s administrative boundaries. This excludes additional employment land required to meet strategic “big box” needs of the sub region. 2. Statements of Common Ground between Coventry City Council and Coventry’s neighbouring Local	Discussions are ongoing under the Duty to Co-operate and an MoU and Statements of Common Ground are being developed between the relevant parties. Plan making in other FEMA areas is progressing at different rates depending on which Local Authority is involved and	No change

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						<i>engaging in the West Midlands Development Needs Group referenced earlier in this paper. This details 'opportunity areas' for further exploration, and for Coventry this relates to 'Area 7' which will primarily relate to further joint working with Rugby Borough. Coventry is highly constrained and has no new sites which would meet the criteria set out in the study therefore discussions will be required as Rugby progresses its local plan.</i> <i>On this particular (employment) issue, the total local need figure for Coventry for the period 2021-41 was calculated to be 105 hectares. From this Coventry had a supply of 60 hectares and a residual need of 45 hectares. Despite repeated Call for Sites, Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it is unable to accommodate a 45 hectare shortfall. It has also made them aware that a Green Belt site (11 hectares developable to the east of the city) is being promoted but that it has been rejected through site assessment.</i>	Planning Authorities need to be prepared and proposed sites subject to separate public consultation, identifying major new employment sites which will meet both Coventry's and the West Midlands employment needs both within and also outside Coventry's administrative boundaries. 3. These sites then need to be identified within the Reg 19 Coventry Local Plan and also in the forthcoming neighbouring Local Planning Authority's Reg 19 Development plan reviews for submission in 2025/26.	will be subject to independent examination for those authorities so it is not appropriate to reference specific neighbouring sites in the Coventry Local Plan, nor to require other areas to review their Green Belt as that is the decision of each LPA.	

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						<i>Discussions are ongoing through CSWAPO and with the linked duty to Co-operate Group and associated Local Authorities in regard to this matter, but this currently remains an outstanding issue that has not yet been resolved. In part this is because most partner authorities are at earlier stages of plan preparation.</i> <i>The authority is continuing to work to develop an MoU with partners and working to establish Statements of Common Ground.</i> 2. The HEDNA Alignment Paper Considers that Coventry City Council should provide 105 ha of new Employment Land (B2 and B8) excluding any contribution to the strategic “big box” needs of the sub-region. Planning Assessment Paragraphs 24-27 of the NPPF of December 2023 sets out National Planning policy relating to maintaining effective co-operation in the plan	4. If Statements of Common Ground identifying major sites which can deliver the shortfall of employment land cannot be agreed between Coventry City Council and the adjacent Local Planning Authorities then there needs to be a new employment policy within the Reg 19 Coventry City Local Plan. 5. This new employment policy would support new employment site allocations on sustainable development sites within close proximity to the City’s own administrative boundaries which can deliver both Coventry’s and		

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						making process, including the need to provide Statements of Common Ground. The Regulation 19 submitted plan's evidence base does not provide Statements of Common Ground with Coventry's adjacent Local Planning Authorities which specifically identifies employment site allocations for employment uses which meets the shortfall of employment land of 45 hectares so as to meet Coventry's employment needs either inside or outside its administrative boundaries – as well meeting strategic “big box” employment needs of the sub region.	the sub regions employment needs. 6. To deliver the acknowledged shortfall of employment land, the Coventry Local Plan also needs to have a policy which states that the green belt boundaries of all of Coventry's adjacent Local Planning Authority's need to be reviewed in order to help the delivery of major new employment sites. Some of the identified new major employment sites will therefore need to be released from the green belt because there is evidence that there are “exceptional circumstances” to do so and the these sites also		

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							no longer meet green belt designation criteria or are identified as “grey belt sites” in accordance with the NPPF of December 2024.		
Coventry and Warwickshire Chamber of Commerce (ID8)	DS 1	N	Y	N	Y	In terms of the provision of employment land this key policy is unsound and fails to comply with the Duty to Cooperate provisions as set out in national planning guidance. The Councils overarching draft policy DS1 consciously does not seek to provide the estimated requirement for new employment land over the plan period as identified in the text (ref DS1(3)). This in effect undermines much of the economic vision and ambition set out in the Plan’s strategy as set out in the introduction for the draft plan and also expressed through the One Coventry Plan 2022-2030. These proposals will undermine the current local economy and hold back local economic growth. In view of how commercial markets operate, the absence of new allocations will impact across the	The modification necessary to make this Policy sound will be for the Council to set out a commitment to provide a minimum of employment needs within its boundaries or alternatively the Council should publish hard evidence jointly with its neighbouring authorities to explain how any “exported” growth can be accommodated both in locational and timing terms. The draft plan must also address with more precision and detail the issue of how Coventry’s share of the overall	The plan has set out the amount of employment it can accommodate and is working with partners to develop an MoU and Statements of Common Ground in terms of how any shortfall can be accommodated. It is not possible for the Council to be more precise in	No change as a result of the representation made here however DtC discussions are ongoing in terms of additional supply capacity in relation to the recycling of land and so there may be some modification to the supply

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						whole commercial market operations for the provision of land and buildings. In turn, both existing business and potential inward investment companies will continue to suffer the lack of choice and shortages of suitable premises, which as evidence suggests characterises the current commercial markets across Coventry. The Chamber of Commerce is disappointed in the Councils overall approach to economic growth which appear to contradict many of the clearly stated objectives for creating a vibrant and growing local economy and the stated ambitions for the wider sub regional economy. The Chamber does not accept that the City Council is “not able to accommodate the growth within its boundaries”. This implies a physical constraint and that is not correct. An alternative strategy based on a review of Green Belt boundaries would, in the opinion of the Chamber be able to identify sufficient land to meet the projected shortfall without compromising the key functions of the local green belt boundaries. Moreover, as an alternative there are a number of	sub regional need is to be accommodated and brought forward within the plan period. Currently the strategic “big box” need is characterised as being between 136-311 ha across the sub region (para 5.14). This in the context of this plan needs to be narrowed down and much greater clarity provided.	relation to the other FEMA authorities as this is a matter for their own plan making processes, all of which are at different stages. However as a result of ongoing DtC discussions the Council is exploring opportunities relating to the modernisation and recycling of land which may be able to contribute to further supply.	and shortfall figures.

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						strategic areas in the land immediately adjoining Coventry's boundaries which could provide further alternatives, if there was an effective and transparent partnership arrangement between the Coventry and Warwickshire sub regional local authorities. Neither of these practical options to accommodate Coventry's growth appears to have been contemplated and properly examined in the early foregoing stages of the plan's preparation. The Chamber also believes that the approach that underpins this policy does not reflect the Councils obligations under the Duty to Cooperate(DTC) and partnership working .This is principally because the whole process that underpins the application of the DTC across Coventry and indeed the other sub regional authorities is effectively a "black box"; an opaque process that is not recorded in publicly accessible documents or meeting minutes and agendas. Instead, relevant bodies and potential partners seeking to engage, are unable to understand the current nature and status of joint working and how, for example, the Council is able		The DtC compliance paper shows details of the various DtC discussions.	

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						to advance the view that <i>“On going work is continuing collaboratively and constructively to address strategic need as being a constrained area no further opportunities are available in Coventry”</i> (para 3.13 page 17). We can see no evidence for this other than the assertion of the City Council . There are no notes or minutes of the regular liaison meetings. It is impossible to judge exactly where the whole process of liaison, joint and partnership working currently sits. As this plan is at a relatively advanced statutory stage the approach cannot be judged to be sound.			
Savills on behalf of Crest Nicholson (ID53)	DS 1	N/A	N/A	N	Y	Proposed Policy DS1 states that a minimum of 29,100 homes will be planned for over the Local Plan period 2021-2041. This is consistent with the housing need identified within the 2022 Coventry and Warwickshire HEDNA (as reviewed through the subsequently commissioned Review of Coventry’s Housing Need, published in June 2024). It is also noted that Coventry City Council will have concluded its consultation on the Regulation 19 stage Local Plan before 12th March 2025 and is	Crest Nicholson considers that the Coventry Local Plan should be seeking to meet a higher housing target than its minimum housing need in order to: ensure that there is sufficient variety in the size and number of housing sites allocated and delivered; enable the Coventry housing need to be met; to facilitate the	It is considered that the HEDNA local needs figures are appropriate	No change

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						thereby eligible to proceed to Examination against the provisions set out within the December 2023 NPPF. The December 2023 version of the NPPF allowed: “exceptional circumstances” to be used to justify a deviation from the use of the standard method as the basis of calculating housing need. Nevertheless even if the use of the HEDNA figures as the basis for the Coventry housing need is deemed to constitute exceptional circumstances, paragraph 67 of the December 2023 NPPF still identifies that growth ambitions linked to economic development or infrastructure investment can result in the identified housing requirement being planned for in a Local Plan being higher than the identified housing need. NPPF paragraph 60 also introduces the opportunity to also give consideration to the importance being placed on delivery of affordable x DS1 housing and the need to ensure that a sufficient variety and amount of land can come forward where it is needed.	delivery of additional affordable housing; and accord with the requirements of NPPF paragraphs 60 and 67.		

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						The Housing Background Paper (November 2024) highlights the significant need for affordable housing for the Plan period¹. By contrast the published Authority Monitoring Reports identify that substantially less affordable housing than this identified affordable housing need has been completed on an annual basis since 2011/12 (ranging from 75 dwellings per year to 392 dwellings per year). This would provide a clear justification to plan for the delivery of more than the base housing need position in order to enable the delivery of more affordable homes. It should also be recognised that some allocated sites and sites with planning permission will take longer to be developed than expected and some allocated / committed sites may even not be constructed during the Plan period. In order to ensure that the Local Plan is effective, justified and consistent with national planning policy it is accordingly important for the Local Plan to allow for an additional 'buffer' in setting the housing requirement for the Plan period to ensure that there is sufficient variety in the size and number of			

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						housing sites allocated and delivered to enable the Coventry housing need to be met and to facilitate the delivery of additional affordable housing. In this regard Crest Nicholson considers that the Coventry Local Plan should be seeking to meet a higher housing target than its minimum housing need. ¹Net annual additional need of 941 social / affordable rented homes and 149 affordable ownership homes.			
Harris Lamb on behalf of Barberr y (ID18)	DS 1	Y	Y	N	Y	Policy DS1 Barberry object to Policy DS1 principally in respect of the approach taken to meeting the Council's employment land requirements. Part 3 of the policy confirms that the Council's employment land requirement is 105 hectares over the period 2021 to 2041. However, the supporting text at paragraph 3.14 confirms that there is only 45 hectares of available land within the City to meet this need. Part C of the policy states that the	In order to address our concerns we would wish to see a signed MoU presented to the examination that sets out where and how much land each of the adjoining authorities had agreed to provide to meet Coventry's needs.	Para 3.14 states that there is a supply of 60ha and a shortfall of 45 ha. Discussions are ongoing under the Duty to Cooperate and an MoU and Statements of	An update will be provided to the EiP to reflect ongoing discussion with FEMA partners and any resultant changes to the shortfall and

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						Council will work with its neighbours to ensure that the shortfall is met through the Duty to Cooperate. We note the provisions within Policy DS1 that state the Council will work with its adjoining neighbours on site that are adjacent to the boundary in order to work proactively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire. In light of Barberry's interests at Junction 2 of the M6 the site is located on the edge of Coventry albeit within Rugby Borough and has been promoted to Rugby as a suitable site for employment development. Barberry are, however, concerned with this approach and whether the policy is sufficiently robust to ensure that the shortfall will actually be provided elsewhere. We note that the Council have previously signed a Memorandum of Understanding ("MoU") with its adjoining neighbours on employment land when adopting the current Local Plan. This MoU set out where and how much land each of the adjoining authorities had agreed to provide to meet Coventry's needs.	Should there be a requirement to reach agreement with its adjoining neighbours then the land at Junction 2 would in our view be a suitable site to be allocated for employment use to meet either the needs of Rugby or Coventry.	Common Ground will be produced. As a result of ongoing discussion there may need to be modifications to the shortfall and supply figures and an update to the EiP will be provided.	supply figures in the plan.

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						Barberry contend that the Council should enter into a similar agreement MoU with its neighbours in order to ensure that the shortfall of employment land will be addressed through the various Local Plans to be prepared in the HMA authorities. As it stands, we do not consider that the policy is sound as it will not be effective in delivering the Council's employment land requirements.			

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Stoford Developments (ID60)	DS 1	N	Y	N	Y	Objections to Policy DS1 and JE2 1.1 We object to criteria 1.b and 1.c. of Policy DS1 in respect of employment land provision. Criterion 1.b. plans for a minimum of 60 ha of employment land to meet local needs within the city's administrative boundary between 2021 - 2041. This 60ha comprises: • completions between 2021 – 2024 (25.4ha), • commitments (6.2ha) and • allocations (28.6ha) (not including Baginton Fields). 1.2 Criterion 1.c. plans for 25ha to be provided at Baginton Fields, to contribute to sub regional need in Coventry and Warwickshire. 1.3 None of the allocations made within the revised Local Plan are new allocations. All of the allocations were previously made for a Plan period that extended to 2031. The revised Plan extends to 2041, with no new allocations being proposed, despite a new evidence base (Coventry and Warwickshire HEDNA 2022, WESESS 2024, and the	1. Correct the error in recorded completions set out in the Plan. The completions between 1st April 2021 and 31st March 2024 are cited as 25.4ha. However, the completions data provided in the Council's annual monitoring reports for the last 3 years (2021/22, 2022/23 and 2023/24) total 21.02ha (accounting for losses). Thus, a difference of 4.38ha in completions. The Council's B2/B8 local employment land supply totals 55.82ha and not the figure of 60.2ha. 2. Retain Baginton Fields (25ha) as a local needs. Accordingly, criterion 1.b. of Policy DS1: Overall Development Needs should be	The completions data is taken from the Alignment report produced by Iceni and the figure is considered to be a robust assessment and whilst the calculations are not an exact science they are considered to be an appropriate assessment of the situation at the point the data was collated.	No change

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						CW Alignment Paper 2024 all confirming an increased need for employment land at Coventry (and Warwickshire). i. Are the recorded completions accurate? The completions between 1st April 2021 and 31st March 2024 are cited as 25.4ha. However, the completions data provided in the Council's annual monitoring reports for the last 3 years (2021/22, 2022/23 and 2023/24) total 21.02ha (accounting for losses). Thus, a difference of 4.38ha in completions. We request that this error be rectified and the supply / residual need figure be updated accordingly. ii. What sites comprise the committed supply? We also query the committed supply figure of 6.2ha in Table 5.1. it is unclear which sites comprise the commitments. iii. Implications of the supply on the Plan Period 1.4 The Plan refers to a local employment land requirement (use classes B2 and B8) of 105ha	amended to plan for a minimum of 85ha of employment land to meet local needs within the city's administrative boundary (i.e. the 60ha currently referenced within DS1, plus the 25ha arising from Baginton Fields). The need for criterion c would consequently fall away. 3. Re-examine the committed supply figure of 6.2ha in Table 5.1 of the Plan. It is unclear which sites comprise the commitments. 4. Continue Duty to Cooperate discussions with Rugby Borough Council to assist in meeting the local employment shortfall and progress a	Baginton Fields was allocated through the 2017 Local Plan for strategic need, and this was found to be sound. The committed supply is set out in the HELAA. DtC discussions are ongoing with FEMA authorities and an update will be provided to the EiP. Evidence base is considered robust.	

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						between 2021 and 2041, which equates to a need of 5.25ha per annum. Table 5.1 of the Plan provides the class B2 and B8 local employment land (B2 and B8) supply components for Coventry. When the correct completions figure (using AMR data) is counted within the supply (i.e. supply reduced by 4.38ha as set out above), the Council's B2/B8 local employment land supply totals 55.82ha and not the figure of 60.2ha in Table 5.1 of the Plan. This equates to a supply of just 10.6 years from 2021 and means that there will be a complete absence in supply for the last years of the plan period (2031-2041). 1.5 For this reason, we object to the reallocation of Baginton Fields as a sub-regional strategic employment site. With there being an absence of supply from 2031 onwards, it is unclear why the Local Plan proposes to utilise Baginton Fields – a site that is sustainably located within the City's administrative area and close to residential areas to facilitate local job opportunities – but is being proposed now to serve strategic employment	Memorandum of Understanding. 5. Recognise and rectify the errors in the strategic employment needs evidence base (namely the WMSESS 2024 and subsequent Alignment Paper 2024) and plan for higher strategic employment needs in Opportunity Area 7 via the Duty to Co-operate with Rugby Borough Council.	Baginton is a strategic site because it comprises part of the Coventry and Warwick Gigapark Investment Zone	

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						needs, and not contribute towards the 105ha requirement of Coventry itself. 1.6 The decision to not allocate Baginton Fields towards meeting local needs, means that the Local Plan supply (stated as being 60.2ha) (Table 5.1) is some 45ha short of the City's requirement. If Baginton Fields were retained as a site for local employment purposes this would add 25ha of land to the supply, decrease the shortfall in supply to 20ha (from 45ha) and add a further 4.7 years to the supply (to a total of 15.3 years). This is significant. Given the origin of need, the remaining shortfall of 20ha should then be met on new allocated within the City and / or, on sites closest to Coventry within adjoining authorities. Historically, the City Council have worked effectively with their neighbours and non-strategic and strategic, unmet needs from the City have been met close to the City within the Local Authority areas of Rugby, Warwick and Nuneaton and Bedworth at Ansty Park, Prologis Park Ryton, Prologis Park Keresley and the Coventry airport site.			

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						1.7 Aside from its scale at 25ha, there does not appear to be good reason for the reassignment of Baginton Fields, from a local needs site to a sub-regional strategic employment site. This site is in the heart of Coventry, within walking distance of potential labour and occupies a school which is currently seeking permission to extend (PL/2025/0000308/FUL). There are also restrictive planning policy requirements on the site including the need to safeguard the Sowe Valley River corridor and Stonebridge Meadows Local Nature Reserve, and compensatory provision for the King Henry VIII School playing fields. Given the need to work around the onsite school and the nature reserve, the configuration of the residual land is considered more appropriate for smaller units to meet local employment needs and is unlikely to support the needs of strategic site occupiers. Strategic Site Requirements 1.8 The West Midlands Strategic Employment Sites Study 2024 (WMSESS) identifies a need for 1 or 2			

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						strategic employment sites of c.25ha (for E(g)/B2 uses) or c.50ha (for B8/mixed uses) in Opportunity Area 7: M6 / A45 / A46 / M45 Coventry & Rugby. This Opportunity Area covers Coventry City and much of Rugby Borough. It extends marginally into Nuneaton and Bedworth Borough and Warwick District. 1.9 The Coventry and Warwickshire Alignment Paper 2024 advises that the residual strategic site need for Area 7 is up to 84ha, and this is across the area of the M6/A45/A46/M45 Coventry and Rugby. The requirements will be met through the preparation of Local Plans. 1.10 In terms of Local Plan progress, Nuneaton and Bedworth are at examination with their Local Plan and the Inspector has stated in his initial findings (reported in the Post Hearing Letter dated 14th November 2024) that the Plan may be capable of being found sound via main modifications. Since this Plan is likely to be found sound and be adopted in mid-late 2025, Nuneaton and Bedworth are at			

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						least 5 years away from being able to assist with strategic needs or now assist in any shortfall (i.e. the 45ha arising from Coventry). 1.11 Warwick District and Stratford-on-Avon District are currently consulting on their Preferred Options (Regulation 18) Joint Local Plan which proposes site options to meet strategic employment needs identified in the WMSESS 2024. Opportunity Area 8 identified in the WMSESS extends exclusively across Warwick District and Stratford on Avon District and it is most appropriate for the South Warwickshire Plan to respond to and seek to accommodate needs identified in this area. 1.12 Rugby Borough is considered most able to assist in meeting the strategic employment needs of Opportunity Area 7. The Borough sits squarely within the Opportunity Area and its Local Plan is yet to reach Preferred Options (Regulation 18). Thus, Rugby is located appropriately to respond to the sub-regional needs of Opportunity Area 7 and at an appropriate stage of plan making to meaningfully			

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						assist in meeting these needs, and any unmet local employment need. 1.13 In a report prepared for Rugby's Cabinet meeting on 4th March 2025, Rugby Council acknowledge that "Coventry City Council does not have land to allocate further large employment sites... Therefore, it is proposed that the 84ha/294,000m2 required in opportunity area 7 to 2045 should be accommodated in Rugby Borough." 1.14 The residual strategic sites need figure of 84ha is calculated after commitments (in Appendix 3 of the WMSESS and Appendix 1 of the Coventry and Warwickshire Alignment Paper) are deducted. This includes 25ha at Baginton Fields. However, for the reasons above, we believe this site is far better suited to meet local needs and should remain as such in the emerging Plan and thus not be deducted as a component of strategic supply. 1.15 Importantly, if Baginton Fields is reassigned to meet local needs, (for the reasons we have outlined			

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						above) its contribution to meeting strategic needs should be omitted and the residual need for Opportunity Area 7 increased (from 84ha). For Opportunity Area 7 this means that the residual 'strategic sites' need should be increased from 84ha to 109ha (+25ha). As Rugby Borough Council acknowledge, the City does not have large employment sites available to meet strategic needs, and we consider therefore, that this should be met in Rugby Borough. 1.16 For the reasons above we recommend that Baginton Fields (25ha) be included as a local needs site and that criterion 1.b. of Policy DS1: Overall Development Needs plan for a minimum of 85ha of employment land to meet local needs within the city's administrative boundary (i.e. the 60ha currently referenced within DS1, plus the 25ha arising from Baginton Fields). The need for criterion c would consequently fall away. 1.17 Notwithstanding this change, we note that a shortfall in local employment land of 20ha would			

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						remain (i.e. the requirement is 105ha and the updated supply would be 85ha). As above, Rugby Borough is best placed to assist in meeting this unmet local need (in addition to Strategic needs). 1.18 The Council's Duty to Cooperate Statement states that "Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it is unable to accommodate a 45 hectare shortfall... but this currently remains an outstanding issue that has not yet been resolved. In part this is because most partner authorities are at earlier stages of plan preparation". Having regard to Rugby's Cabinet Paper for its meeting on the 4th of March we note that there is not a single mention of Rugby assisting Coventry's unmet local needs. Therefore, whilst we support the intentions of criterion 3 of Policy DS1, to date, this unmet need remains unresolved, and Rugby Council do not appear to be taking any share of this. A Memorandum of Understanding between Coventry and Rugby must be progressed to progress this matter.			

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						1.19 We support criterion 4 of Policy DS1 which allows for an early review of the Plan (either wholly or partially) if required, in certain circumstances, including, through the Duty to Co-operate, where the unmet employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities. The Strategic Sites Need is higher than 84ha for Opportunity Area 7 1.20 Our representations thus far have been based on the 'claimed' 84ha residual strategic site need, referenced in the revised Local Plan and set out in within the Alignment Paper 2024. 1.21 Stoford, together with our expert consultants, Marrons, consider there are serious flaws in the WMSESS 2024 and subsequent Alignment Paper 2024 that mean that the strategic employment needs for Coventry and Warwickshire are significantly higher. Our reasoning for this is set out succinctly in the appended report, commissioned by Stoford, and prepared by Marrons Economics			

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						which provides a technical Review of WMSESS 2024 and the Alignment Paper 2024. 1.22 In short, Marron's assessment demonstrates that the residual strategic sites need across Coventry and Warwickshire should be increased by a further +448.7ha and 528.7ha simply to account for errors in the calculation of need. 1.23 Marron's also note that the Alignment Paper 2024 identifies a need for strategic sites across Coventry and Warwickshire that align relatively closely with the HEDNA figure from 2022 – and the HEDNA also forms part of the Local Plan evidence base. 1.24 The Alignment Paper 2024 calculates a residual strategic sites need from a gross figure, by deducting sites with planning permission. Whilst this is acceptable in principle, the Alignment Paper 2024 includes sites within this supply of land, that artificially inflate it and should not be counted as commitments/supply.			

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						1.25 For example, WMSESS deducts from the overall strategic need, two large sites within Coventry and Warwickshire that are for a specific occupier/use. These being the JLR reserved site (adopted Core Strategy) in Stratford-on-Avon (100ha) and Battery Manufacturing facility at Coventry Airport (124.7ha). These sites will not assist in meeting the WMSESS modelled need for general employment uses and should not have been taken off the overall strategic need. 1.26 The Alignment Paper 2024 also deducts 64ha from the overall strategic site need for WMSESS Opportunity Area 7 (Coventry and Rugby). This is because of planning permission having been granted for the site known as Padge Hall, even though this site falls outside of the identified opportunity area (7) for Coventry and Rugby. Moreover, this site is intended to meet the needs of a specific occupier relocating from Hinckley (as stated within the planning application material), and again, the occupiers' need will not have been			

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						factored into the WEMSESS modelling. It is incorrect for the Alignment Paper to therefore deduct 64ha from the Opportunity Area 7 overall needs as a consequence of this planning permission. 1.27 Full details of our concerns and the need for higher strategic growth for Coventry and Warwickshire is contained in Marron's Technical Review of the WMSESS and Coventry and Warwickshire HEDNA – WMSESS Alignment Paper (Officer comment, this is an appendix to the full rep, see this in full representation).			
Nexus Planning on behalf of CEG Land Promotion III	DS 1	N	N	N	Y	Policy DS1 states that provision will be made for a minimum of 29,100 (1,455 per annum) additional dwellings between 2021 and 2041. The supporting text to the policy confirms the housing need figure has been derived from the Coventry and Warwickshire Housing and Economic Development Needs Assessment ("HEDNA") (2022) and that this was confirmed to be a reliable basis for plan	The Council should therefore adopt a housing requirement greater than the HEDNA figure. As noted by Planning Practice Guidance; the use of the Standard Method figure to inform the housing requirement will only start to	The Council considers that its approach to calculating housing need is robust.	No change

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(CEG) (ID39)						making in the Review of Coventry's Local Housing Need (June 2024). The NPPF 2012 introduced a radical shift in relation to the approach to meeting housing needs. This remains in the 2023 version where at paragraph 8 three overarching objectives are outlined to securing sustainable development. Paragraph 8b states that to achieve the 'social objective' it is necessary to "to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations..." Paragraph 60 of the NPPF then states that "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay." Despite the additional requirements and objectives imposed by the NPPF, it is widely accepted that	address affordability challenges rather than address them entirely. The Council seeks to rely upon the December 2023 NPPF for the assessment of soundness of the Local Plan Review and so to fail to propose a housing requirement in accordance with the Standard Method associated with that version of the NPPF, the Council's approach is not positively prepared or justified. To rectify this, CEG consider that the Council should instead adopt a housing requirement at least in accordance with the December 2023 Standard Method plus urban uplift. The only way to truly address affordability crises' and to seek to eat away at the identified		

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						there is a national housing crisis due to the consistent failure to achieve the Government's target of 300,000 homes per annum, with affordability unsurprisingly worsening across many parts of the country. Accordingly, it is vital the Local Plan Review sets a positive framework to fully accommodate its housing needs and importantly, address underlying housing market issues. By relying upon a housing requirement established by the HEDNA, the Council's approach fails to follow the requirements of the December 2023 NPPF which requires use of the Standard Method to establish the starting point for its housing requirement. However, it then leans upon the policy and delivery policy mechanisms available to ensure the City's selected housing requirement is met in full, including through use of a Green Belt review and making of additional housing allocations and declaring an unmet need if needed. CEG does not consider it to be appropriate for the Council to choose to use to comply with some parts of the December 2023 NPPF but disregard others.	affordable housing need is to plan for the delivery of more housing across the City which will in turn deliver a greater quantum of affordable housing. The decline in the delivery of affordable housing and the rate of PBSA being delivered within Coventry further confirms the importance of providing the sufficient type and number of dwellings to meet housing need. The December 2023 NPPF states, at paragraph 63: <i>"Within this context of establishing need, the size, type and tenure or housing needed for different groups in the community should be assessed and reflected in planning policies..."</i>		

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						The December 2023 NPPF is clear at paragraph 61 that housing need should be calculated using the Government's Standard Method unless there are exceptional circumstances (emphasis added) to justify an alternative approach. The HEDNA outlines a rationale for applying a trend-based approach, citing historic issues with calculating demographic projections due to the influence of the student population. Whilst there is a degree of merit to this approach, noting the test of national policy, it is considered that further justification is still required in this regard to meet the bar of 'exceptional' circumstances. The use of the HEDNA figure does not account for the urban uplift, a requirement of the December 2023 NPPF. Again, there is no justification presented as to what the exceptional circumstances are to justify removal of this 35% uplift to the Standard Method figure. It is important to note that the HEDNA recommends the inclusion of this uplift as part of its assessment of housing need across Coventry and Warwickshire, however this is ignored by the Local Plan Review. Coventry,	In Coventry, the importance is reinforced when looking at the needs for different house types within the HEDNA. The type of accommodation needed within Coventry is closely aligned with that required within Warwick and Stratford-On-Avon Districts and shows a clear need for family-sized market accommodation i.e. 3-bedroom houses (40%). Given the finite supply of land within Coventry and the recent trends towards the delivery of smaller units and PBSA, there is a clear need to ensure that allocations are made that can provide for a range of house types, in particular family-sized accommodation. This is crucial to help meet Coventry's housing needs and the Local		

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						as the sub-regional centre, should clearly be taking a leading and pro-active role in meeting its identified housing need and to omit the urban uplift against national policy is an unsound approach. Iceni, the Council's consultants, support a deviation from the 2014 projections but they continue to apply the standard framework method to the revised figures. Having arrived at a revised figure, Iceni continue to apply the other elements of the standard method including, crucially, the application of the urban uplift. This is the approach Iceni have adopted for other studies elsewhere, for example in Birmingham and in Leicester and Leicestershire. Coventry's suggested approach is contrary to its own evidence base, which includes the 35% uplift. This revised approach appears to attempt to reduce the housing requirement as much as possible without any clear justification as to what exceptional circumstances exist to support this position.	Plan Review's intent to deliver the housing requirement entirely within Coventry's boundaries is likely to further constrain the type of housing that can viably and feasibly be delivered in the City. It is therefore clear that Coventry must work with its neighbours to find suitable land for the delivery of family housing to ensure that the needs for housing for all parts of the community are satisfied, in line with paragraph 63 of the December 2023 NPPF. This issue cannot simply be deferred until the next local plan review as the shortfall will continue to compound and worsen in years to come – it is critical that this issue is		

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						The Council needs to be clear and explicit in the choices it is seeking to make and apply the tests in NPPF to see if it is justified in doing so. Paragraph 35 of the NPPF is explicit in that plans are 'sound' if appropriate strategies are justified, taking into account reasonable alternatives, and based on proportionate evidence. At present, it is strongly suggested the Councils approach is unsound as there is no justification for the removal of the urban uplift or deviation from the use of the Standard Method. The Council state that their housing need will be delivered fully within the Council's administrative area through an urban and brownfield-focused strategy. CEG have serious concerns regarding this approach particularly given the worsening affordability of family housing, the finite supply of land within Coventry and the over-reliance on smaller units and Purpose-Built Student Accommodation (PBSA) to meet the housing requirement, both historically and looking forward. Housing affordability is an ongoing and increasing pressure which will require a proactive approach to	addressed head-on by the Local Plan Review. For the reasons set out above, CEG consider that the plan's failure to justify deviation from the standard method, failure to plan for the urban uplift and to plan proactively for the type of housing that is required means that Policy DS1 is not effective, nor positively prepared and is therefore unsound. Whether against the selected housing requirement or an uplifted requirement as dictated by the December 2023 NPPF, suitable sites capable of delivering family housing, such as Westwood Heath, need to be identified and their delivery supported. This requires working collaboratively with neighbouring authorities such		

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						address. Furthermore, when considering Coventry's needs and the type of development that has taken place and is needed in the future, it is critically important that housing is delivered which meets the needs of the whole population. The 2023/24 Annual Monitoring Report ("AMR") for Coventry indicates that housing delivery is ahead of the overall requirements established in the adopted Local Plan. However, of 1,859 completions 837 (45%) of these were PBSA, compared to 1,022 (55%) residential dwellings. It is clear that Coventry's housing needs are not based upon the provision of over half of new dwellings required to be student accommodation and CEG considers this must be addressed in planning for future delivery. The 837 (45%) of dwellings delivered as student accommodation were in the form of flats/apartments specifically for student living. This type of housing delivery severely impacts the delivery of affordable housing which has been continually declining throughout the plan period, as PBSA is exempt from affordable housing	as Warwick District Council now under the Duty to Cooperate given the scarcity of suitable land within Coventry. Officer comment: See full representation for additional information		

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						contributions in Coventry. From a peak of 39% in 2012/13 the general trend for affordable housing completions as a percentage of the overall number has continued to decline with only 9.7% of overall completions being affordable in 2023/24. The affordable housing need identified in the Table 8.13 of the HEDNA is 1,887 dwellings per annum. When this is compared to the Council's selected housing requirement in the Local Plan Review of 1,455 dwellings per annum, affordable housing need would equate to 129% of the housing requirement using the trend-based projections. The selected housing requirement will quite clearly result in a significant level of unmet affordable housing need that will not be delivered if the Local Plan Review proceeds in its current form.			
Holt Property Limited (on behalf	DS 1	N		N	N	The following representations are made in response to the Coventry Local Plan Review Regulation 19 Proposed Submission (Publication Stage) Consultation document (December 2024) on behalf of the landowner, in respect of their land	Policy DS1: Overall Development Needs – Plan Period & Housing Requirement	The plan period aligns to the evidence base and it is normal practice to have a plan period	

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of land owner at Hawkes Mill Lane (ID20)						interest at Land to the rear of 147 Hawkes Mill Lane, Coventry CV5 9FP (Site Ref: BAB-007-24). Policy DS1: Overall Development Needs – Plan Period & Housing Requirement Not Sound and Doesn't Comply with Duty to Cooperate - The Plan Period is 2021-2041. There is no justification for a Plan period that starts at least five years before the Local Plan is likely to be adopted, and there is no support for adopting such an approach in the NPPF or NPPG. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement. - Policy DS1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351 completions. Therefore, there were 2,986 completions in excess of the proposed Local Plan	To ensure Policy DS1 is sound and complies with the Duty to Cooperate, the following modifications are required: 1. Amend the Plan Period to Ensure Compliance with National Policy - The Plan period should not include a retrospective start date of 2021. Instead, it should commence from the anticipated adoption date (2026) and extend to at least 2042. - Policy amendment required: Revise Policy DS1 to state that the Plan period will run from 2026 to at least 2042, ensuring a full 15-year timeframe from adoption in accordance with NPPF Paragraph 21.	which has a retrospective start date. The Council considers it will have a clear 15 year time period from adoption in line with the NPPF and will amend the LDS prior to submission to clearly demonstrate this. The Council's justification for its need figure is set out in the growth needs	

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						requirement (7,351 dwellings compared to 4,365 dwellings (1,455 x 3 years)). The inclusion of supply between 2021-2024 means that the housing requirement X X DS1 4 for the 15 years ahead from 2026-2041 will not be met (total capacity 31,493 (as set out in Table 6.1 of the Publication document) minus 2,986 = 28,507 which is less than the minimum of 29,100 homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected. • By adopting a Plan period that looks back five years, the Council is manipulating the figures to avoid meeting the housing needs of the City. • Furthermore, Paragraph 22 is clear that Local Plans should look ahead over a minimum 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged.	• Remove references to the retrospective start date of 2021, as this undermines the Plan's ability to make sufficient housing provision for the future. • Justification: - o NPPF Paragraph 21 requires Local Plans to look ahead for a minimum of 15 years from adoption. The proposed period of 2021– 2041 fails to meet this requirement. - o Extending the plan period to 2042 ensures compliance in the event of adoption delays if the Examination takes longer than expected. 2. Increase the Housing Requirement to Reflect Identified Needs • The proposed housing requirement of 1,455 dwellings	background paper and is considered robust. In regard to the comments about meeting the needs of the Greater Birmingham Housing Market Area, Coventry is a constrained city which sits within a different HMA and this is not considered to be a reasonable approach.	

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						- It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure represents the minimum number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with NPPF Paragraph 67. - Further consideration should be given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan. The most recent Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings arising from the GBBCHMA with total contributions of only 18,181 dwellings committed. However, this is now out-of-date on account of	per annum (dpa) is insufficient to meet the identified need. - Policy amendment required: The minimum housing requirement should be 35,352 homes from 2024 to 2042, plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. - Justification: - The Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) identifies a need for at least 1,964 dpa. - The removal of 35% (509 dpa) from the calculation is not justified within national policy when applied in this context. - NPPF Paragraph 60 requires Local Plans to significantly		

Local Plan Review

Regulation 19: Summary of Representations

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						Local Plan progress and revisions to the calculation of Local Housing Need derived from the Standard Method. It is understood that work is underway to update the Position Statement to 2025, Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum, the shortfall is still likely significant. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF. • In addition, Policy DS1 4. fails to state that the Council will review its Local Plan policies within 5 years of the date of adoption, and therefore is not consistent with the NPPF Paragraph 33. Further, NPPF Paragraph 33 requires strategic policies to be updated if their applicable local housing need figure has changed significantly; and they are likely	boost the supply of homes. However, the Plan period and housing requirement in Policy DS1 actively constrain future delivery by retrospectively 6 including supply from 2021 and failing to plan for sufficient homes beyond 2026. 3. Address Unmet Housing Needs from Birmingham and the Black Country • The Council has not demonstrated effective engagement with Birmingham and Black Country authorities on housing needs. • Policy amendment required: - o The Plan should explicitly identify and accommodate an appropriate proportion of Birmingham and Black Country's unmet housing need.		

Local Plan Review

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						to require earlier review if local housing need is expected to change significantly in the near future. This is not reflected in the criteria a. to d. under 4. in DS1. Policy DS1 4. should be amended to be consistent with Paragraph 33 of the NPPF.	- o The Duty to Cooperate process should be evidenced and made transparent in accordance with NPPF Paragraph 27. • Justification: - o The Greater Birmingham & Black Country Housing Market Area (GBBCHMA) Position Statement Addendum (April 2023) identified a 106,654 dwelling shortfall, with only 18,181 dwellings currently committed. - o NPPF Paragraph 35(c) requires plans to be positively prepared and effective. The absence of a transparent approach to unmet need undermines these tests of soundness.		

Local Plan Review

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							4. Introduce a Review Mechanism to Ensure Policy Remains Up to Date • Policy DS1 4. does not currently commit to a formal review mechanism, meaning the housing requirement could become outdated before the next plan review. • Policy amendment required: - o The Plan should commit to a mandatory review within five years of adoption, ensuring alignment with NPPF Paragraph 33. • Justification: - o NPPF Paragraph 33 requires strategic policies to be reviewed at least every five years. Without a clear review mechanism, the Plan risks becoming inconsistent with changing housing needs.		

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							Conclusion Without these modifications, Policy DS1 is not sound and fails the Duty to Cooperate. The proposed changes will ensure that: • The Plan Period aligns with national policy and provides a realistic forwardlooking strategy. • The housing requirement reflects economic and demographic realities. • Cross-boundary unmet housing needs are addressed in line with national guidance. • A robust review mechanism ensures policy remains relevant and effective. • A robust review mechanism ensures the Local Plan remains responsive to changing housing and economic conditions.		

Local Plan Review

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							These modifications are necessary to ensure Policy DS1 meets the tests of soundness as required by NPPF Paragraph 35, ensuring it is positively prepared, justified, effective, and consistent with national policy. Additional Housing Land – Land at Hawkes Mill Lane, Coventry To strengthen the housing supply strategy and ensure sufficient deliverable land is allocated, the Council should consider the suitability of Land to the rear of 147 Hawkes Mill Lane, Coventry. • The site is immediately available and can contribute to short-term housing delivery.		

Local Plan Review

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							• It is bordered by existing residential development, including the recent Bloor Homes scheme, making it a logical urban extension. • Unlike some constrained sites, this land has no major environmental or viability barriers. • The Green Belt assessment should be reviewed more granularly, as this site does not significantly contribute to Green Belt purposes and could be released without harming strategic objectives. Allocating Land to the rear of 147 Hawkes Mill Lane within the Local Plan Review would enhance housing delivery, strengthen spatial planning, and ensure a more balanced and justified approach to future growth.		

Local Plan Review

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Holt Property Limited (on behalf of landowner of land off Pickford Green Lane) (ID20)	DS 1	N		N	N	The following representations are made in response to the Coventry Local Plan Review Regulation 19 Proposed Submission (Publication Stage) Consultation document (December 2024) on behalf of the landowner, in respect of their land interest at Land off Pickford Green Lane, Coventry, CV5 7BX (Site Ref: BAB-010- 24). Policy DS1: Overall Development Needs – Plan Period & Housing Requirement Not Sound and Doesn't Comply with Duty to Cooperate The Plan Period is 2021-2041. There is no justification for a Plan period that starts at least five years before the Local Plan is likely to be adopted, and there is no support for adopting such an approach in the NPPF or NPPG. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement.	Policy DS1: Overall Development Needs – Plan Period & Housing Requirement To ensure Policy DS1 is sound and complies with the Duty to Cooperate, the following modifications are required: 1. Amend the Plan Period to Ensure Compliance with National Policy - The Plan period should not include a retrospective start date of 2021. Instead, it should commence from the anticipated adoption date (2026) and extend to at least 2042. - Policy amendment required: Revise Policy DS1 to state that the Plan period will run from	The plan period aligns to the evidence base and it is normal practice to have a plan period which has a retrospective start date. The Council considers it will have a clear 15 year time period from adoption in line with the NPPF and will amend the LDS prior to submission to clearly demonstrate this.	No change

Local Plan Review

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						- Policy DS1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351 completions. Therefore, there were 2,986 completions in excess of the proposed Local Plan requirement (7,351 dwellings compared to 4,365 dwellings (1,455 x 3 years)). The inclusion of supply between 2021-2024 means that the housing requirement X X DS1 4 for the 15 years ahead from 2026-2041 will not be met (total capacity 31,493 (as set out in Table 6.1 of the Publication document) minus 2,986 = 28,507 which is less than the minimum of 29,100 homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected. - By adopting a Plan period that looks back five years, the Council is manipulating the figures to avoid meeting the housing needs of the City. - Furthermore, Paragraph 22 is clear that Local Plans should look ahead over a minimum 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered	2026 to at least 2042, ensuring a full 15-year timeframe from adoption in accordance with NPPF Paragraph 21. - Remove references to the retrospective start date of 2021, as this undermines the Plan's ability to make sufficient housing provision for the future. - Justification: - NPPF Paragraph 21 requires Local Plans to look ahead for a minimum of 15 years from adoption. The proposed period of 2021– 2041 fails to meet this requirement. - Extending the plan period to 2042 ensures compliance in the event of adoption delays if the Examination takes longer than expected.	The Council's justification for its need figure is set out in the growth needs background paper and is considered robust. In regard to the comments about meeting the needs of the Greater Birmingham Housing Market Area, Coventry is a constrained city which sits within a different HMA and this is not	

Local Plan Review

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						prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged. - It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure represents the minimum number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with NPPF Paragraph 67. - Further consideration should be given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan. The most recent Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum was published in April 2023,	2. Increase the Housing Requirement to Reflect Identified Needs - The proposed housing requirement of 1,455 dwellings per annum (dpa) is insufficient to meet the identified need. - Policy amendment required: The minimum housing requirement should be 35,352 homes from 2024 to 2042, plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. - Justification: - The Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) identifies a need for at least 1,964 dpa.	considered to be a reasonable approach.	

Local Plan Review

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						reporting a total shortfall of some 106,654 dwellings arising from the GBBCHMA with total contributions of only 18,181 dwellings committed. However, this is now out-of-date on account of Local Plan progress and revisions to the calculation of Local Housing Need derived from the Standard Method. It is understood that work is underway to update the Position Statement to 2025, Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum, the shortfall is still likely significant. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF. • In addition, Policy DS1 4. fails to state that the Council will review its Local Plan policies within 5 years of the date of adoption, and therefore is not	- o The removal of 35% (509 dpa) from the calculation is not justified within national policy when applied in this context. - o NPPF Paragraph 60 requires Local Plans to significantly boost the supply of homes. However, the Plan period and housing requirement in Policy DS1 actively constrain future delivery by retrospectively 6 including supply from 2021 and failing to plan for sufficient homes beyond 2026. 3. Address Unmet Housing Needs from Birmingham and the Black Country • The Council has not demonstrated effective engagement with Birmingham and Black Country authorities on housing needs.		

Local Plan Review

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						consistent with the NPPF Paragraph 33. Further, NPPF Paragraph 33 requires strategic policies to be updated if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. This is not reflected in the criteria a. to d. under 4. in DS1. Policy DS1 4. should be amended to be consistent with Paragraph 33 of the NPPF.	• Policy amendment required: - o The Plan should explicitly identify and accommodate an appropriate proportion of Birmingham and Black Country's unmet housing need. - o The Duty to Cooperate process should be evidenced and made transparent in accordance with NPPF Paragraph 27. • Justification: - o The Greater Birmingham & Black Country Housing Market Area (GBBCHMA) Position Statement Addendum (April 2023) identified a 106,654 dwelling shortfall, with only 18,181 dwellings currently committed. - o NPPF Paragraph 35(c) requires plans to be positively prepared and effective. The absence of a		

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							transparent approach to unmet need undermines these tests of soundness. 4. Introduce a Review Mechanism to Ensure Policy Remains Up to Date • Policy DS1 4. does not currently commit to a formal review mechanism, meaning the housing requirement could become outdated before the next plan review. • Policy amendment required: - o The Plan should commit to a mandatory review within five years of adoption, ensuring alignment with NPPF Paragraph 33. • Justification: - o NPPF Paragraph 33 requires strategic policies to be reviewed at least every five		

Local Plan Review

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							years. Without a clear review mechanism, the Plan risks becoming inconsistent with changing housing needs. Conclusion Without these modifications, Policy DS1 is not sound and fails the Duty to Cooperate. The proposed changes will ensure that: • The Plan Period aligns with national policy and provides a realistic forward-looking strategy. • The housing requirement reflects economic and demographic realities. • Cross-boundary unmet housing needs are addressed in line with national guidance. • A robust review mechanism ensures policy remains relevant and effective.		

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							A robust review mechanism ensures the Local Plan remains responsive to changing housing and economic conditions. 7 These modifications are necessary to ensure Policy DS1 meets the tests of soundness as required by NPPF Paragraph 35, ensuring it is positively prepared, justified, effective, and consistent with national policy. Additional Housing Land – Land off Pickford Green Lane, Coventry, CV5 7BX To strengthen the housing supply strategy and ensure sufficient deliverable land is allocated, the Council should consider the suitability of Land off Pickford Green Lane, Coventry.		

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							• The site is immediately available and can contribute to short-term housing delivery. • It is adjacent to the Eastern Green Allocation, making it a logical urban extension. • Unlike some constrained sites, this land has no major environmental or viability barriers. • The Green Belt assessment should be reviewed more granularly, as this site does not significantly contribute to Green Belt purposes and could be released without harming strategic objectives. The allocation of Land off Pickford Green Lane, Coventry is necessary to support the delivery of a positively prepared and sound		

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							development strategy. The site is adjacent to the Eastern Green Sustainable Urban Extension (SUE), making it a logical urban extension that can integrate seamlessly into existing infrastructure and services.		
Holt Property Limited (on behalf of landowner at Pickford Grange Lane) (ID20)	DS 1	N		N	N	The following representations are made in response to the Coventry Local Plan Review Regulation 19 Proposed Submission (Publication Stage) Consultation document (December 2024) on behalf of the landowner, in respect of their land interest at Land off Pickford Grange Lane, Coventry, CV5 9AR (Site Ref: BA-009-24). Policy DS1: Overall Development Needs – Plan Period & Housing Requirement Not Sound and Doesn't Comply with Duty to Cooperate The Plan Period is 2021-2041. There is no justification for a Plan period that starts at least five	Policy DS1: Overall Development Needs – Plan Period & Housing Requirement To ensure Policy DS1 is sound and complies with the Duty to Cooperate, the following modifications are required: 1. Amend the Plan Period to Ensure Compliance with National Policy The Plan period should not include a retrospective start	The plan period aligns to the evidence base and it is normal practice to have a plan period which has a retrospective start date. The Council considers it will have a clear 15 year time period from adoption	

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						years before the Local Plan is likely to be adopted, and there is no support for adopting such an approach in the NPPF or NPPG. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement. Policy DS1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351 completions. Therefore, there were 2,986 completions in excess of the proposed Local Plan requirement (7,351 dwellings compared to 4,365 dwellings (1,455 x 3 years)). The inclusion of supply between 2021-2024 means that the housing requirement X X DS1 4 for the 15 years ahead from 2026-2041 will not be met (total capacity 31,493 (as set out in Table 6.1 of the Publication document) minus 2,986 = 28,507 which is less than the minimum of 29,100 homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected.	date of 2021. Instead, it should commence from the anticipated adoption date (2026) and extend to at least 2042. - Policy amendment required: Revise Policy DS1 to state that the Plan period will run from 2026 to at least 2042, ensuring a full 15-year timeframe from adoption in accordance with NPPF Paragraph 21. - Remove references to the retrospective start date of 2021, as this undermines the Plan's ability to make sufficient housing provision for the future. - Justification: - NPPF Paragraph 21 requires Local Plans to look ahead for a minimum of 15 years from adoption. The proposed period	in line with the NPPF and will amend the LDS prior to submission to clearly demonstrate this. The Council's justification for its need figure is set out in the growth needs background paper and is considered robust. In regard to the comments about meeting the needs of the	

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						• By adopting a Plan period that looks back five years, the Council is manipulating the figures to avoid meeting the housing needs of the City. • Furthermore, Paragraph 22 is clear that Local Plans should look ahead over a minimum 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged. • It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure represents the minimum number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with NPPF Paragraph 67.	of 2021– 2041 fails to meet this requirement. - o Extending the plan period to 2042 ensures compliance in the event of adoption delays if the Examination takes longer than expected. 2. Increase the Housing Requirement to Reflect Identified Needs • The proposed housing requirement of 1,455 dwellings per annum (dpa) is insufficient to meet the identified need. • Policy amendment required: The minimum housing requirement should be 35,352 homes from 2024 to 2042, plus an uplift to address housing affordability in the City and a contribution to unmet needs	Greater Birmingham Housing Market Area, Coventry is a constrained city which sits within a different HMA and this is not considered to be a reasonable approach.	

Local Plan Review

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						Further consideration should be given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan. The most recent Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings arising from the GBBCHMA with total contributions of only 18,181 dwellings committed. However, this is now out-of-date on account of Local Plan progress and revisions to the calculation of Local Housing Need derived from the Standard Method. It is understood that work is underway to update the Position Statement to 2025, Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum, the shortfall is still likely significant. There is no evidence that the Council have engaged	from Birmingham and the Black Country. - Justification: - The Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) identifies a need for at least 1,964 dpa. - The removal of 35% (509 dpa) from the calculation is not justified within national policy when applied in this context. - NPPF Paragraph 60 requires Local Plans to significantly boost the supply of homes. However, the Plan period and housing requirement in Policy DS1 actively constrain future delivery by retrospectively 6 including supply from 2021 and failing to plan for sufficient homes beyond 2026.		

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						with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF. • In addition, Policy DS1 4. fails to state that the Council will review its Local Plan policies within 5 years of the date of adoption, and therefore is not consistent with the NPPF Paragraph 33. Further, NPPF Paragraph 33 requires strategic policies to be updated if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. This is not reflected in the criteria a. to d. under 4. in DS1. Policy DS1 4. should be amended to be consistent with Paragraph 33 of the NPPF.	3. Address Unmet Housing Needs from Birmingham and the Black Country • The Council has not demonstrated effective engagement with Birmingham and Black Country authorities on housing needs. • Policy amendment required: - o The Plan should explicitly identify and accommodate an appropriate proportion of Birmingham and Black Country's unmet housing need. - o The Duty to Cooperate process should be evidenced and made transparent in accordance with NPPF Paragraph 27. • Justification: - o The Greater Birmingham & Black Country Housing Market Area (GBBCHMA) Position		

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							Statement Addendum (April 2023) identified a 106,654 dwelling shortfall, with only 18,181 dwellings currently committed. o NPPF Paragraph 35(c) requires plans to be positively prepared and effective. The absence of a transparent approach to unmet need undermines these tests of soundness. 4. Introduce a Review Mechanism to Ensure Policy Remains Up to Date • Policy DS1 4. does not currently commit to a formal review mechanism, meaning the housing requirement could become outdated before the next plan review. • Policy amendment required:		

Local Plan Review

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							o The Plan should commit to a mandatory review within five years of adoption, ensuring alignment with NPPF Paragraph 33. - Justification: o NPPF Paragraph 33 requires strategic policies to be reviewed at least every five years. Without a clear review mechanism, the Plan risks becoming inconsistent with changing housing needs. Conclusion Without these modifications, Policy DS1 is not sound and fails the Duty to Cooperate. The proposed changes will ensure that: - The Plan Period aligns with national policy and provides a realistic forward looking		

Local Plan Review

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							strategy. • The housing requirement reflects economic and demographic realities. • Cross-boundary unmet housing needs are addressed in line with national guidance. • A robust review mechanism ensures policy remains relevant and effective. • A robust review mechanism ensures the Local Plan remains responsive to changing housing and economic conditions. These modifications are necessary to ensure Policy DS1 meets the tests of soundness as required by NPPF Paragraph 35, ensuring it is positively prepared, justified, effective, and consistent with national policy.		

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							Additional Housing Land – Land off Pickford Grange Lane, Coventry, CV5 7BX To strengthen the housing supply strategy and ensure sufficient deliverable land is allocated, the Council should consider the suitability of Land off Pickford Grange Lane, Coventry. • The site is immediately available and can contribute to short-term housing delivery. • It is adjacent to the Eastern Green Allocation, making it a logical urban extension. • Unlike some constrained sites, this land has no major environmental or viability barriers. • The Green Belt assessment should be reviewed more granularly, as this site does not significantly contribute to		

Local Plan Review

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							Green Belt purposes and could be released without harming strategic objectives. The allocation of Land off Pickford Grange Lane, Coventry is necessary to support the delivery of a positively prepared and sound development strategy. The site is adjacent to the Eastern Green Sustainable Urban Extension (SUE), making it a logical urban extension that can integrate seamlessly into existing infrastructure and services.		

Policy DS2 - The Duty to Co-operate and partnership working

Holt Property Limited (on behalf of landowner of land east of Pickford Grange Lane) (ID20)	DS 2	N		N	N	The following representations are made in response to the Coventry Local Plan Review Regulation 19 Proposed Submission (Publication Stage) Consultation document (December 2024) on behalf of the landowner, in respect of their land interest at Land East of Pickford Grange Lane, Coventry (Site Ref: BAB-017-24). Policy DS1: Overall Development Needs – Plan Period & Housing Requirement Not Sound and Doesn’t Comply with Duty to Co-Operate • The Plan Period is 2021-2041. There is no justification for a Plan period that starts at least five years before the Local Plan is likely to be adopted, and there is no support for adopting such an approach in the NPPF or NPPG. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement. • Policy DS1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351 completions. Therefore, there were 2,986	Policy DS1: Overall Development Needs – Plan Period & Housing Requirement To ensure Policy DS1 is sound and complies with the Duty to Cooperate, the following modifications are required: 1. Amend the Plan Period to Ensure Compliance with National Policy • The Plan period should not include a retrospective start date of 2021. Instead, it should commence from the anticipated adoption date (2026) and extend to at least 2042. • Policy amendment required: Revise Policy DS1 to state that the Plan period will run from 2026 to at least 2042, ensuring a full 15-year timeframe from adoption in accordance with NPPF Paragraph 21.	The plan period aligns to the evidence base and it is normal practice to have a plan period which has a retrospective start date. The Council considers it will have a clear 15 year time period from adoption in line with the NPPF and will amend the LDS prior to submission to clearly demonstrate this. The Council’s justification for its need figure is	

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					completions in excess of the proposed Local Plan requirement (7,351 dwellings compared to 4,365 dwellings (1,455 x 3 years)). The inclusion of supply between 2021-2024 means that the housing requirement for the 15 years ahead from 2026-2041 will not be met (total capacity 31,493 (as X X DS1 4 set out in Table 6.1 of the Publication document) minus 2,986 = 28,507 which is less than the minimum of 29,100 homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected. • By adopting a Plan period that looks back five years, the Council is manipulating the figures to avoid meeting the housing needs of the City. • Furthermore, Paragraph 22 is clear that Local Plans should look ahead over a minimum 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged. • It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure represents the minimum number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with NPPF Paragraph 67.	• Remove references to the retrospective start date of 2021, as this undermines the Plan's ability to make sufficient housing provision for the future. • Justification: - o NPPF Paragraph 21 requires Local Plans to look ahead for a minimum of 15 years from adoption. The proposed period of 2021– 2041 fails to meet this requirement. - o Extending the plan period to 2042 ensures compliance in the event of adoption delays if the Examination takes longer than expected. 2. Increase the Housing Requirement to Reflect Identified Needs • The proposed housing requirement of 1,455 dwellings per annum (dpa) is insufficient to meet the identified need. • Policy amendment required: The minimum housing requirement should be 35,352 homes from 2024 to 2042, plus an uplift to address housing affordability in the City and a	set out in the growth needs background paper and is considered robust. In regard to the comments about meeting the needs of the Greater Birmingham Housing Market Area, Coventry is a constrained city which sits within a different HMA and this is not considered to be a reasonable approach.	

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						• Further consideration should be given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan. The most recent Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings arising from the GBBCHMA with total contributions of only 18,181 dwellings committed. However, this is now out-of-date on account of Local Plan progress and revisions to the calculation of Local Housing Need derived from the Standard Method. It is understood that work is underway to update the Position Statement to 2025, Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum, the shortfall is still likely significant. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF.	contribution to unmet needs from Birmingham and the Black Country. • Justification: - o The Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) identifies a need for at least 1,964 dpa. - o The removal of 35% (509 dpa) from the calculation is not justified within national policy when applied in this context. - o NPPF Paragraph 60 requires Local Plans to significantly boost the supply of homes. However, the Plan period and housing requirement in Policy DS1 actively constrain future delivery by retrospectively 6 including supply from 2021 and failing to plan for sufficient homes beyond 2026. 3. Address Unmet Housing Needs from Birmingham and the Black Country • The Council has not demonstrated effective engagement with Birmingham and Black Country authorities on housing needs.		

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						• In addition, Policy DS1 4. fails to state that the Council will review its Local Plan policies within 5 years of the date of adoption, and therefore is not consistent with the NPPF Paragraph 33. Further, NPPF Paragraph 33 requires strategic policies to be updated if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. This is not reflected in the criteria a. to d. under 4. in DS1. Policy DS1 4. should be amended to be consistent with Paragraph 33 of the NPPF	• Policy amendment required: - o The Plan should explicitly identify and accommodate an appropriate proportion of Birmingham and Black Country's unmet housing need. - o The Duty to Cooperate process should be evidenced and made transparent in accordance with NPPF Paragraph 27. • Justification: - o The Greater Birmingham & Black Country Housing Market Area (GBBCHMA) Position Statement Addendum (April 2023) identified a 106,654 dwelling shortfall, with only 18,181 dwellings currently committed. - o NPPF Paragraph 35(c) requires plans to be positively prepared and effective. The absence of a transparent approach to unmet need undermines these tests of soundness. 4. Introduce a Review Mechanism to Ensure Policy Remains Up to Date		

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							• Policy DS1 4. does not currently commit to a formal review mechanism, meaning the housing requirement could become outdated before the next plan review. • Policy amendment required: - o The Plan should commit to a mandatory review within five years of adoption, ensuring alignment with NPPF Paragraph 33. • Justification: - o NPPF Paragraph 33 requires strategic policies to be reviewed at least every five years. Without a clear review mechanism, the Plan risks becoming inconsistent with changing housing needs. Conclusion Without these modifications, Policy DS1 is not sound and fails the Duty to Cooperate. The proposed changes will ensure that: • The Plan Period aligns with national policy and provides a realistic forward looking strategy.		

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							• The housing requirement reflects economic and demographic realities. • Cross-boundary unmet housing needs are addressed in line with national guidance. • A robust review mechanism ensures policy remains relevant and effective. • A robust review mechanism ensures the Local Plan remains responsive to changing housing and economic conditions These modifications are necessary to ensure Policy DS1 meets the tests of soundness as required by NPPF Paragraph 35, ensuring it is positively prepared, justified, effective, and consistent with national policy. Additional Housing Land – Land East of Pickford Grange Lane, Coventry To strengthen the housing supply strategy and ensure sufficient deliverable land is allocated, the Council should consider the suitability of Land		

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							East of Pickford Grange Lane, Coventry. • The site is immediately available and can contribute to short-term housing delivery. • It is adjacent to the Eastern Green Allocation, making it a logical urban extension. • Unlike some constrained sites, this land has no major environmental or viability barriers. • The Green Belt assessment should be reviewed more granularly, as this site does not significantly contribute to Green Belt purposes and could be released without harming strategic objectives. The allocation of Land East of Pickford Grange Lane, Coventry is necessary to support the delivery of a positively prepared and sound development strategy. The site is adjacent to the Eastern Green Sustainable Urban Extension (SUE), making it a logical urban extension that can integrate seamlessly into		

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							existing infrastructure and services.		
Newton LDP (ID38)	DS 1: 3.1 5	N	N		Y	Policy DS1: Overall Development Needs – Plan Period This policy is not positively prepared, justified or consistent with the NPPF. It is therefore not Sound. Policy DS1 defines the Plan period as 2021 – 2041 which commences at least five years prior to the earliest date at which it is anticipated that the Local Plan will be adopted, albeit it should be noted that these timescales often slip. This is not justified nor is there anything within National policy which supports this approach. Accordingly, reference to the past 5 years means that the plan does not make sufficient provision to meet the Council's future housing requirement and manipulates the figures to avoid the release of land from the Green Belt. Furthermore, the NPPF at Paragraph 22 states that Local Plans should look ahead over a minimum 15 year period from adoption. There is no flexibility built into the existing draft to cater for any delay associated with adoption of the Local Plan. The policy also fails to state that the Council will review the Local Plan within 5 years of adoption and therefore is not consistent with Paragraph 33 of the NPPF 2023. The policy should be amended so that it is in line with the NPPF.	1. Alter the Plan period so that it commences from the date of adoption, with sufficient time to allow for slippage. 2. Remove the previous 5 years' housing completions from current calculations for housing requirement/supply. 3. Review the Local Plan within 5 years of adoption, in line with the NPPF.	It is normal practice to back date a Local Plan and this has been done to align with the evidence base. It is agreed that national policy requires strategic policies of local plans to be reviewed every 5 years.	No change

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North Warwic kshire Boroug h Council (ID43)	DS 1 (3, 4 and a)			N	N	Please see Local Development Framework Sub-committee report of the 26th February 2025. Coventry City Council have identified a shortfall of 45 hectares for the Local Employment need. To meet this shortfall Coventry City Council is seeking neighbours to deliver this land. The Borough Council welcomes the opportunity to work with Coventry City Council as per Policy DS2 and note the text references in DS1, section 3, 4 and a. Nevertheless, there are concerns that insufficient attempts have been made to address the unmet employment need indicated, through further greenbelt review and release, further considerations for regeneration and redevelopment opportunities and intensification of use within existing sites.	DS1 should be modified to clarify how and where the shortfall will be addressed or re-distributed.	Discussions are ongoing with partners across the FEMA in regard to this matter including NWBC and Statements of Common Ground and an updated MoU are being produced.	DtC discussions ongoing
CPRE (ID12)	DS 1				Y	The Plan applies the output from the HEDNA (2022) and proposes Local Housing Need for Coventry for the period 2021-2041 as 29,100 houses (1,455 per annum). The HEDNA covers Coventry and the five Districts of Warwickshire. However, for the Warwickshire Districts notably Warwick and Stratford-upon-Avon, which are at Reg.18 stage, new (Dec 2024) NPPF policy requires the use of annual housing numbers using the new standard methodology ('NSM') which are on a different basis.	Policy DS1(1)(a) should be amended to state Policy DS1: Overall Development Needs 1. Over the Plan period 2021-2041 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and	The figures used are from the HEDNA, and considered robust and an appropriate approach under the Transitional Arrangements (2023 NPPF)	No change

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					This is all the more justified because the differences between old Standard Method (SM) and the NSM balance Coventry against the 5 Districts closely: Dwellings per annum (DPA) Coventry old SM: 3082 NSM: 1388 - 1694 Warwickshire (all 5 Districts) old SM: 2315 NSM: 3907 +1592 The HEDNA and the supplementary Review of Coventry's Housing Need (June 2024) conclude that the annual housing requirement for Coventry is 1455 houses (para 3.9). This is very similar to the NSM's target (1388). There is joint working on housing requirements between Coventry and the Warwickshire Districts and the Duty to Cooperate requires this. Using two different methodologies for the one Housing Market Area and sub-region is not justified. The housing need for Coventry should be 1,388 dpa; for the Plan Period 27,760 dwellings (not 29,100). This should not be described as a minimum. Policy DS1(1)(a) should be amended to state Policy DS1: Overall Development Needs 1. Over the Plan period 2021-2041 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and environmental enhancements:-	environmental enhancements:- a. 27,760 additional homes....		

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						a. 27,760 additional homes....			
Oxalis on behalf of Hallam Land (ID46)	DS 1: 3.1 4- 3.1 5	N	N	N	Y	The CCC Local Plan Regulation 19 version (December 2024) ('CCCLP') sets out that the Council will not allocate new non-strategic employment sites to meet the identified shortfall of 45 ha (as identified in paragraph 3.14 of the draft Plan). In summary, HL object to the CCCLP as it is unsound on the basis that it has not been positively prepared to meet the employment development needs of the area. The 2023 NPPF (Paragraph 86) is clear about the importance of assessing economic needs and then putting in place a plan to meet those needs. This forms one part of the expectations of planning policies which are required, inter alia, to (our emphasis added): a. set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth; b. set criteria, or identify sites, for local and inward investment.....to meet anticipated needs over the plan period; d. be flexible enough to accommodate needs not anticipated in the plan....and enable a rapid response to changes in economic circumstances. Draft Policy DS1 part 3 sets out that the employment land need will not be accommodated within CCC's boundary and that CCC will continue to work through the Duty to Co-operate to make appropriate provision elsewhere. However, at this stage, we are	Policy DS1 should meet the entirety of the recognised employment land need either by allocating sufficient sites, or through the duty to cooperate via a secured agreement such as a memorandum of understanding or statement of common ground. Identified employment land needs should be reconsidered in order to consider relevant market signals as required by paragraph 32 of the NPPF.	The Council considers its approach to be robust and discussions are ongoing under the DtC with partners in the FEMA in regard to the shortfall, and an updated MoU and Statements of Common Ground are being produced.	As a result of ongoing discussion under the DtC with FEMA authorities there may be some adjustment to the supply and shortfall figures cited in the plan and an update to the EiP will be provided.

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					unaware that any public draft Statement of Common ground (SoCG) or Memorandum of Understanding (MoU) has been published to confirm that the City's unmet local employment land need is guaranteed to be met by neighbouring authorities. If such a document is being prepared and exists in draft, it should be made available. In our view, this approach is unsound as the identified employment land requirements are not proposed to be met or planned for either by allocating new sites, or by a confirmed MoU or SoCG with neighbouring authorities. The evidence base prepared by CCC and their neighbouring authorities acknowledges that the CCCLP fails to meet the needs identified with a shortfall of local employment land of 45 ha. The CCCLP cannot be considered sound when it clearly fails to meet the requirements of para 86 of the NPPF, where no clear strategy is proposed to positively and proactively encourage sustainable economic growth, and identified needs will not be met. As referred to above, the requirements of the 2023 NPPF includes not only planning to meet anticipated needs, but also to 'be flexible enough to accommodate needs not anticipated'. It is unclear how the current proposed approach of the CCCLP is attempting to accord with the NPPF given it is failing even to meet currently identified need and so provides no flexibility for additional needs. The CCCLP falls some way short of meeting the requirements of the NPPF with regard			

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						to planning for local (and other) employment need and is therefore unsound. The Savills report (submitted with these representations) critiques the evidence base for employment land needs in support of the Local Plan comprising the 2022 HEDNA, 2024 WMSESSS, and 2024 alignment paper. It assesses that the identified employment land requirements are formed by an analysis of trend-based data, which does not consider market indicators. Recent market trends indicate through the high absorption rates, low stock availability, and increased rental values that the market has historically (and currently) been constrained by supply, therefore resulting in inhibited take-up. The trend-based assessment in the evidence base, therefore, does not consider these market conditions and in turn underestimates the actual employment land needs requirements. This does not accord with NPPF Paragraph 32 (Dec 2023) which specifically requires policies to “take into account relevant market signals”. Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025. Officer comment: See detailed representations for further information			
Tetlow King Plannin	DS 1	N	N	N	N	<u>Policy DS1: Overall Development Needs</u> Draft Policy DS1 sets out that the Council will make provisions for an additional 29,100 dwellings over	Respondent comment: ‘See representation response’.	The Council considers its approach to be	No change

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g on behalf of the West Midlands Housing Association Planning Consortium (ID63)					the 20-year Plan period between 2021 and 2041, equating to 1,455 dpa. It is understood that the Council will not be utilising the standard method to identify its Local Plan housing requirement, as explained at paragraphs 3.6 to 3.8 of the draft plan. The National Planning Practice Guidance (PPG) sets out that this may be acceptable where the Council can justify an alternative approach¹. The Council must be prepared to robustly justify its proposed housing requirement methodology at the Local Plan Examination. We note that the proposed housing requirement figure of 1,455 dpa is 18% higher than the 1,230 dpa housing requirement figure in the current adopted plan, which is encouraging. Notwithstanding, the WMHAPC notes the Council's approach to the proposed housing requirement, particularly the exclusion of the 35% urban uplift requirement of the NPPF (2023)² for major cities such as Coventry. The Council has opted to base its housing requirement on 2021 Census data rather than the 2014 population projections, citing concerns about the latter's validity. While we acknowledge the importance of using the latest data available, we note that the 2021 Census was conducted during the Covid-19 pandemic, which may also impact its reliability. A balanced, evidence-based approach is crucial, and at present, the robust justification for departing from the standard method remains unclear as it is solely reliant on the		robust and justified as set out in the Growth Needs background paper.	

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					disagreement on population projections. As a result, Coventry's housing requirement drops to just 1,455 dpa (29,100 over the plan period). This is unreasonable, unjustified, and unsound. The adopted Local Plan already acknowledges concerns about census data reliability. However, previous assessments including the Coventry & Warwickshire Joint SHMA (2013) accounted for these concerns while maintaining a robust housing need calculation. Icen, the Council's own consultants, support a deviation from the 2014 projections but still apply the standard method framework, including the urban uplift. This is consistent with their approach in other cities, such as Birmingham and Leicester, where unmet housing needs were planned for in surrounding areas. If Coventry cannot meet all of its housing needs within its boundaries, it must identify and accommodate this unmet need in collaboration with neighbouring authorities. It is noted that under the standard method calculation of the latest NPPF (2024), the housing requirement for Coventry would be 1,527 dpa. If the Council wishes to continue with the Local Plan preparation under the transitional arrangements, it must apply the full standard method calculations of the NPPF (2024). However, if the Council intends on continuing with the standard method of the NPPF (2023), then it			

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						must apply the uplift which would equate to 1,964 dpa as acknowledged in paragraph 3.26 of the Iceni report titled Review of Coventry's Local Housing Need (June 2024) which states that <i>"With the further 35% urban uplift then applied, the overall need shown was for 1,964 dwellings per annum."</i> The approach taken in this Plan by not including the urban uplift does not reflect the proactive planning required to meet Coventry's needs, nor does it align with the vision of the adopted Local Plan, which committed to planning for unmet housing needs in cooperation with neighbouring authorities. This decision reduces the supply of new homes by 437 dpa, equivalent to 8,740 homes over the Plan period, making it harder for people to find affordable housing. With fewer homes available, house prices and rents could rise, putting more pressure on local families and key workers. Given these concerns, the WMHAPC encourages the Council to reconsider its approach and apply the full urban uplift. This would help ensure that Coventry meets its housing needs, supports economic growth, and provides enough affordable homes for local residents.			
Marrons on behalf of Hallam	DS 1			N	Y	Policy DS1: Overall Development Needs – Plan Period Not Sound 1. Policy DS1 is not positively prepared, justified, or consistent with national policy.	Policy DS1 1. should be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing	The plan period aligns to the evidence base and it is normal practice to have a plan period	No change

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Land (ID28)						2. Policy DS1 1. defines the Plan period as 2021-2041. The Local Plan will not be adopted until at least 2026, five years into the Plan period. There is no justification for a Plan period that starts five years before the Plan is adopted, and there is no support for adopting such an approach in the NPPF or NPPG. 3. NPPF paragraph 21 requires strategic policies to look ahead over a minimum 15 year period. There is no requirement for strategic policies to also look backwards 5 years. 4. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement. 5. Policy DS1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351 completions¹. Therefore, there were 2,986 completions in excess of the proposed Local Plan requirement ($7,351 - 1,455 \times 3 = 2,986$). The inclusion of supply between 2021-2024 means that the housing requirement for the 15 years ahead from 2026-2041 will not be met (total capacity $31,4932 - 7,6663 = 23,827$ which is less than the minimum of 24,0074 homes required). This is	affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. Policy DS1 4. should be amended to be consistent with paragraph 33 of the NPPF.	which has a retrospective start date. The Council considers it will have a clear 15 year time period from adoption in line with the NPPF and will amend the LDS prior to submission to clearly demonstrate this. The Council's justification for its need figure is set out in the growth needs background paper. In terms of the employment figures these have been updated through the alignment paper	

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					irrespective of whether the identified sites and unidentified sites deliver as expected. 6. The December 2023 NPPF paragraph 60 clearly states the Government's objective is to significantly boost the supply of homes. That has not changed with the change in Government. By adopting a Plan period that looks back 5 years, the Council is manipulating the figures to avoid meeting the housing needs of the City. 7. Further to the above point, Policy DS1 1. only plans to 2041. NPPF Paragraph 22 is clear that Local Plans should look ahead over a minimum 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged. Policy DS1: Overall Development Needs – Housing Requirement 8. Policy DS1 1. also specifies the minimum housing requirement as 29,100 (1,455 dpa). This is based on the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022), minus 10,180 dwellings (509 dpa) based on removing 35%. The removal of 35% is a reference to the 'urban uplift' which should be applied to the Local Housing Need calculation using the Standard Method, and not the HEDNA method of calculating housing need.		In terms of affordable housing this has been informed by viability work, see also reps to Policy H6. In regard to the comments about meeting the needs of the Greater Birmingham Housing Market Area, Coventry is a constrained city which sits within a different HMA and this is not considered to be a reasonable approach.	

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					9. Whilst the HEDNA approach to determining the appropriate level of housing growth to be planned for in Coventry is considered acceptable in principle, concerns are raised in the 1 Table 5 of the HELAA November 2024 2 Total supply from Table 6.1 of the Proposed Submission Plan 3 Past net completions from Table 6.1 of the Proposed Submission Plan attached Housing Need Evidence Base Review relating to the future job growth forecasts used in preparing the HEDNA being unduly pessimistic. 10. The HEDNA uses the Cambridge Econometrics (CE) March 2021 baseline economic growth forecast. This forecast was prepared during the COVID-19 lockdown when economic growth was far from certain and was informed by uncertain economic conditions. The CE forecast is for 0.44% per annum growth (820 jobs per annum) in Coventry over the CLPR Plan period, less than the 1.0% per annum growth (equivalent to 1,995 jobs per annum) experienced since 1981, and growth of over 2% per annum between 2011 and 2019 (3,338 jobs per annum). The CE forecasts were also based on 3.6% GDP in 2021 and a 2.8% increase in GDP in 2022. Reference to the ONS' December 2022 GDP monthly estimate report states how GDP is estimated to have grown by 4.0% in 2022, following growth of 7.6% in 2021.			

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						11. Furthermore, the HEDNA identifies how 551 hectares of logistics floorspace is needed across the housing market area to 2041. However, the location for this land has not been confirmed and so the job growth associated it has not been considered. 12. As a minimum, the attached Housing Need Evidence Base Review considers that 1.0% growth since 1981 should be assumed, which aligns with the 1,964 dwellings per annum established by the HEDNA and emphasises how the housing requirement of 1,455 dwellings per annum is inadequate. This is particularly important given the recognised shortfall in employment land supply of circa 45ha (Paragraph 3.15 of the Proposed Submission Plan), with the deficit in employment land supply likely to be even greater than reported. 13. It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure of 1,964 dwellings per annum represents the minimum number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with paragraph 67 of the NPPF; for example in order to address a significant affordable housing shortfall, support economic development or address strategic infrastructure requirements			

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					which are likely to increase the number of homes needed. 14. As set out in the attached Housing Need Evidence Base Review, the HEDNA describes affordable housing need across the HMA as “clearly acute” and identifies a “notable need” for affordable housing. It also states how it is clear that provision of new affordable housing is an “important and pressing issue in the area”. Figure 8 of the AMR 2023/24 shows that 2,933 affordable homes have been delivered since 2011 compared to a Local Plan requirement of 4,176 dwellings for the same period. 15. The HEDNA calculates significantly higher affordable need in CCC of approximately 2,000 affordable dwellings per annum. This reflects the Council’s waiting list (over 13,000 households), a 68% increase in the number of households in temporary accommodation in only 24 months, a 114% increase in only five years in the number of households who are homeless and owed a relief duty, and the fact that Coventry has the 12th highest ratio of homeless households per 1,000 population of over 300 local authorities in England. 16. Addressing affordable housing need in any meaningful way will require an uplift to the HEDNA’s calculation of 1,964 dwellings per annum, or indeed the Council’s proposed housing requirement of 1,455 dwellings per annum.			

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						17. Further, consideration has not been given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan. Birmingham and the Black Country 18. There are strong functional relationships between Birmingham, the Black Country and Coventry, in terms of transport connections and commuting patterns, and development in Coventry can contribute towards meeting unmet needs. As set out in the Birmingham HEDNA (2022) at Appendix 1 on Housing Market Area and Functional Economic Market Area, Coventry has one of the highest levels of migration flows with both Birmingham and the Black Country. Whilst in the past Coventry itself has declared unmet needs and not contributed to unmet needs in the HMA, that situation no longer exists. 19. The most recent Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings arising from the GBBCHMA with total contributions of only 18,181 dwellings committed. However, this is now out-of-date on account of Local Plan progress and revisions to the			

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						calculation of Local Housing Need derived from the Standard Method. It is understood that work is underway to update the Position Statement to 2025, and it is still expected to identify a significant deficit in supply across the HMA as explained below. Birmingham 20. There are strong functional relationships between Birmingham and Coventry and the relationships across the wider area should be understood including the relationship between homes and jobs as a Functional Economic Market Area. 21. It is recognised that the shortfall arising from Birmingham is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum given the Local Housing Need derived from the Standard Method has decreased to 4,448 dwellings per annum. Indeed, based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Birmingham Local Plan period 2020 to 2042 and comparing with reported supply in the Birmingham Local Plan Preferred Options (July 2024), the shortfall arising from Birmingham will have been eradicated. Dudley			

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					22. The Dudley Local Plan was subject to Regulation 19 consultation in October and November 2024. It reports a housing need of 11,169 dwellings in the Plan period 2024 to 2041 with supply of 10,470 dwellings, resulting in a shortfall of 699 dwellings to be exported through the Duty to Cooperate. 23. It is noted that the housing requirement is based on the Local Housing Need derived from the previous Standard Method of 657 dwellings per annum; this has now increased significantly to 1,462 dwellings per annum. 24. Should the Dudley Local Plan be submitted for Examination before 12th March 2025 it will be captured by the transitional arrangements set out in the NPPF and able to continue on the basis of the lower Local Housing Need derived from the previous Standard Method. However, should the Dudley Local Plan not progress to Examination before 12th March 2025, the Council will be required to utilise the increased Local Housing Need derived from the Standard Method for plan-making. Based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Dudley Local Plan period 2024 to 2041 and comparing with reported supply in the Dudley Local Plan Publication Plan (October 2024), the shortfall arising from Dudley would increase to some 14,384 dwellings. Sandwell			

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					25. The Sandwell Local Plan was submitted for Examination in December 2024. It reports a supply of 10,434 dwellings compared with a housing need of 26,350 dwellings in the Plan period 2024 to 2041, resulting in a shortfall of some 15,916 dwellings to be exported through the Duty to Cooperate. 26. It is noted that Sandwell's Local Housing Need derived from the Standard Method has marginally reduced from 1,550 dwellings per annum to 1,346 dwellings per annum, however given the stage of preparation of the Sandwell Local Plan it is captured by the transitional arrangements in the NPPF. In any case, the shortfall in supply in Sandwell is significant. Walsall 27. Further to the disbandment of the Black Country Plan in late 2022, Walsall Council have not yet made notable progress on a new Local Plan, with Issues and Options consultation is expected in 2025. Given the shortfall reported in the Black Country Plan and the increase in Walsall's Local Housing Need derived from the Standard Method since (now 1,148 dwellings per annum), it is likely that there will continue to be a shortfall arising from Walsall that requires consideration. Wolverhampton			

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					28. The Wolverhampton Local Plan was subject to Regulation 19 consultation in November 2024 to January 2025. It reports a housing need of 19,728 dwellings in the Plan period 2024 to 2042 with supply of 9,330 dwellings, resulting in a shortfall of some 10,398 dwellings to be exported through the Duty to Cooperate. Contributions to Shortfall 29. The GBBCHMA Position Statement Addendum outlines contributions towards unmet needs committed at April 2023, however several of these commitments have now fallen away or been reduced. 30. 2,665 dwellings contribution from Lichfield are noted in the Position Statement Addendum, however the Lichfield Local Plan was withdrawn in October 2023. Initial work on a new Local Plan has commenced and was subject to Issues and Options consultation in October to December 2024. The Issues and Options document confirms commitment to the Duty to Cooperate but does not set a commitment to meeting unmet needs arising from the GBBCHMA. 31. 1,500 dwellings contribution from Shropshire are noted in the Position Statement Addendum. Whilst this is still maintained, the Shropshire Local Plan Review is currently under scrutiny at Examination with significant soundness concerns raised by the Inspectors. There is			

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					therefore potential for the Shropshire Local Plan Review to be withdrawn and the committed contribution to unmet needs to disappear. 32. 2,105 dwellings contribution from Solihull are noted in the Position Statement Addendum, however the Solihull Local Plan Review was withdrawn in October 2024, with no progress yet made on a new Local Plan. 33. 4,000 dwellings contribution from South Staffordshire are noted in the Position Statement Addendum, however this has been reduced to 640 dwellings in the South Staffordshire Local Plan submitted for Examination in December 2024. 34. The net result of the above is a reduction of some 8,130 dwellings in commitments to unmet needs arising from the GBBCHMA, with a further 1,500 dwellings committed also potentially falling away. 35. It is noted that the Telford and Wrekin Local Plan Review will be subject to Publication consultation from March 2025 and includes a commitment to 153 dwellings per annum towards unmet needs arising from the Black Country, however the total level of unmet needs to be met is not clear and it remains untested through Examination. Conclusion on Unmet Needs			

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						36. Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum, the shortfall is still significant. In addition, the level of committed contributions towards unmet needs has decreased. 37. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF. 38. Policy DS1 1. should therefore be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. Officer comment: See full representation for further details			
RPS on behalf of St Modwen	DS 1			N	Y	The draft policy states: <i>“Over the Plan period 2021-2041 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and</i>	To ensure that the Local Plan is justified on the evidence, CCC should modify the housing requirement in Policy DS1 to a minimum of 1,964 dpa (and 39,280 over the plan period)	The Council considers its approach to be robust and justifiable.	No change

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Homes (ID48)					<i>environmental enhancements:- a. A minimum of 29,100 additional homes..."</i> The draft housing requirement set out in Policy DS1 equates to 1,455 dwellings per annum over the 20-year plan period. This figure is derived from the 'alternative' housing projection defined in the HEDNA (2022), which is based on Census 2021 population data, rather than using the 2014-based household projections under the previous standard methodology. In doing so, the adjustment to the standard method focuses on the household projections, but utilises the affordability adjustment. Coventry City Council (CCC) has taken this approach because they intend to progress this Plan under the current transitional arrangements and is therefore being progressed in line with the National Planning Policy Framework (NPPF) December 2023 <i>so as not to slow progress on work which was already very advanced</i> (PSLP, para1.10). Paragraph 61 of the December 2023 NPPF states that <i>'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area</i>	and plan to meet the resulting shortfall, either within the City or by working with neighbouring areas under the duty to cooperate. Alternatively, modify the Plan setting out clearly a commitment to commencing an immediate review and make clear this is necessary to address the shortfall.		

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					<i>which justify an alternative approach to assessing housing need...".</i> Census data on population has been used in calculating local housing need due to statistical issues with the population estimates that informed the 2014-projections, notably apparent problems with an over-estimation of students who were assumed to have remained in the City rather than migrating away. This has led to higher population residing the City than might otherwise be the case, which has fed through the higher household and housing projections. These may comprise the 'exceptional' circumstances, but this will need to be tested through the examination process. The HEDNA 2022 identifies a need for Coventry of 1,964 dpa. This includes the urban centres uplift of 509 dpa. However, in coming to the chosen requirement (1,455) CCC has gone further by explicitly discounting the urban centres uplift required under the relevant standard method applicable in planning practice guidance (PPG) used to calculate the minimum housing need figure for the Plan. The exclusion of the uplift is highly unusual. The effect is to reduce the housing requirement by 10,180 dwellings when set against the HEDNA figure. The housing requirement should reflect the evidence (HEDNA 2022) which recommended the 1,964 dpa figure as being the minimum 'alternative'			

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						housing requirement figure for Coventry. However, CCC provides no evidence to justify not including the urban centres uplift, and so is not soundly-based. Applying the correct standard method figure (consistent with the December 2023 NPPF and the HEDNA 2022) the total minimum housing requirement for Coventry is 39,280 dwellings. Table 6.1 of the Plan identifies a plan period supply of 31,493 dwellings. In this basis, there is a housing shortfall amounting to 7,787 dwellings over the plan period (which is a minimum supply given those sources have yet to be tested through an examination and so may well be lower than suggested). The shortfall in housing is substantial when correctly applying the December 2023 standard method, but remains unaccounted for in the Plan. CCC should ideally pause progress on the Plan and address this issue prior to moving forward to examination. Alternatively, CCC could commit to commencing an immediate review of the Plan once it is adopted, with the stated purpose to accommodate the shortfall as a matter of urgency. Either solution will ensure the Plan is soundly-based.			
Home Builders Federation (ID21)	DS 1	N	N	N	Y	STRATEGIC POLICY, Policy DS1: Overall Development Needs <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i>	Respondent comment: 'Please refer to representation'.	The Council considers its evidence base and the approach to this	No change

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						23. HBF would expect the Coventry Plan to be an ambitious plan that plans for the future development of the City, detailing where new housing will go, meeting housing needs, providing certainty for the house building industry and setting out a long-term vision for the area, in accordance with the NPPF. Instead, although the Council acknowledges the importance of housing, it then fails to follow the NPPF 2023 standard method to establish the starting point for its housing requirement, and then it does use the policy and delivery policy mechanisms available to ensure the needs are met in full, including a Green Belt review and additional housing allocations and declaring an unmet need if needed. These are the mechanisms of the NPPF 2023. It is not appropriate to pick and choose some elements from this approach, but not others. 24. If the Council is unhappy with the standard method calculation methodology under the 2033 NPPF, the version under which it is choosing for its Plan to be examined, it should withdraw the Plan and prepare a new one using the new standard method and NPPF as published on Dec 12th 2024, or return to Reg 18 stage as indicated by Transitional Arrangements Flow Diagram (see Figure One in our reps). The Council		to be robust and justifiable.	

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						simply cannot pick and choose which elements of the relevant national policy it wishes to apply, and which it does not. 25. The Council's reliance on the previous standard method methodology, ignoring the urban uplift and reducing the housing requirement because they disagree with the 2014 population projections is simply not an appropriate way to proceed. It is noted that under the new Dec 2024 NPPF standard method calculation, the Housing Requirement for Coventry would be 1388 per annum, so a new Regulation 19 (or 18) Plan that seeks to plan for this amount of housing is an option that remains available to the Council. If, however, this Plan is to continue under the transitional arrangements that the full standard method calculations of the 2023 NPPF must be used. 26. As we set out in our response to the Regulation 18 consultation on the Coventry Plan. Paragraph 61 of the NPPF requires that in order to "determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects			

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						current and future demographic trends and market signals.” Therefore, the Government requires Local Planning Authorities to use the standard method to calculate our housing need in all but exceptional circumstances. 27. The use of the 2014 population projections are an integral component of the standard method and therefore any departure from using them would be required to be exceptionally justified and reflect current and future demographic trends and market signals. 28. HBF note that the Council questions the validity of the 2014 population projections. Using the standard method as set out in Government policy would require Coventry to deliver 3,188 homes each year as a minimum (using 2021 as the starting point, at least 63,760 homes over the plan period to the year 2041). However rather than using the 2014 figures required by the standard method, the Council is seeking to use the 2021 census figures instead. This results in a reduction in the housing requirements for 1,964 homes a year (at least 39,280 homes over the plan period to 2041).			

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						29. HBF is sympathetic to the concerns of the Council in relation to the 2014 population figures. HBF acknowledge that this longstanding issue but it must be recognised that demographic change would not normally in itself be enough to justify a departure from the standard method. It must also be recognised that rebasing figures against the 2021 Census is not a panacea to the identified problem and that the Census is not perfect. The 2021 census was undertaken during the COVID pandemic and as such may also have issues around representative and reliability, especially in relation to students, many of whom were studying remotely during the pandemic. Although HBF is sympathetic to the need to critically consider the 2014 baseline in the standard method the Council's other departures from the standard method are clearly not justified. 30. In addition to the significant reduction in housing requirement switching from the 2014 to the 2021 figures creates, the Council is also intending to compound the situation further by removing the 35% urban uplift. No evidence or justification is given for this change other than that the Council 'does not agree' with it. The removal of the urban uplift further reduces the housing requirement for Coventry to			

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						only 1,455 homes each year or 29,100 over the plan period to 2041. 31. HBF note that issues around the population projections for Coventry are longstanding. The adopted Local Plan (page 44) already mentions the perceived problems with the census data and the unattributable population growth. Indeed, the adopted Local Plan indicates that this matter had been considered in the Joint SHMA that informed the Objectively Assessed Need in the adopted Local Plan, the method used before the standard method was introduced. 32. HBF also notes Iceni, the Council's consultants, support a deviation from the 2014 projections, but then their work goes on to then apply the standard framework method to the revised figures. Having arrived at a revised figure Iceni continue to apply the other elements of the standard method including the application of the urban uplift. This is the approach Iceni have adopted for other studies elsewhere, for example in Birmingham and in Leicester and Leicestershire. Iceni's work in Leicestershire has identified an unmet need for the city that is now being planned to be met in the Local Plans of the neighbouring Leicestershire authorities. This is how the			

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						system is intended to work. If Coventry is unable to meet all of its needs within the boundary, the unmet need should be identified and accommodated within the neighbouring authorities. Just deciding to remove the urban uplift, is unreasonable, unjustified and unsound. 33. In seeking to utilise the standard method but change two key elements of it methodology the Council is not utilising the standard method. It is in fact proposing to use an entirely different method, from the standard method, to calculate housing need. As such the approach must be justified by exceptional circumstances. 34. The Council's own evidence indicates a worsening housing crisis in Coventry, with affordability become more problematic and a significant need for affordable housing. Even if the census data issues were viewed to create the exceptional circumstances to justify departing from the 2014 figures, HBF cannot see how and further departures from the standard method is justified. There is no justification for the removal of the urban uplift, which is a national policy requirement. Currently the Council seems to be proposing an approach to the housing requirement that seeks to actively make it as small as possible, without providing			

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						good evidence or reason to do so. Such an approach also runs completely contrary to the current and future demographic trends and market signals that the NPPF requires any departure from the standard method to consider. 35. The previous Government supported the national target of 300,000 new homes per year and the urban uplift was part of securing this delivery across the country. The standard method housing requirement has always been the minimum starting point for setting the housing requirement, and HBF support more housing than the standard method housing requirement in order to support economic growth, provide a range and type of sites and to support small and medium house builders. There is a need to provide a range and choice of sites, a need for flexibility and viability considerations to be taken into account and a need for the Council to consider whether higher levels of open-market housing are required in order to secure the delivery of affordable housing and/or support economic growth. 36. NPPF (2023) para 60 still requires that in order “to support the government’s objective of significantly boosting the supply of homes, it is important that a			

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						sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”. 37. HBF cannot understand how the approach in this Plan represents a proactive approach to planning to meet the housing need of Coventry and the wider area envisaged in the adopted Local Plan- where unmet need was going to be proactively planned for in neighbouring areas. The ‘new’ methodology seems to have been artificially contrived to make the housing requirement as low as possible, without the exceptional circumstances that would be needed to justify such a deviation from the standard method. 38. HBF notes that some developer and land promoters have put forward alternative methods of calculating housing requirement, based on the framework of the standard method, but accepting a departure from the 2014 figures. Lichfield’s work has undertaken more detailed research and analysis of the problem with the 2014 figures and how this should be addressed in plan-making. HBF support the need for a robust			

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						understanding of the issues around the problems with the housing projections in Coventry whilst at the same time using the framework of the standard method to calculate the housing requirement. HBF would be supportive of this approach. 39. In relation to the urban uplift HBF do not agree that Coventry Council can simply decide to discard this element of the standard method. The Council's own consultants seem not to support this approach as the HEDNA report prepared by Icenl still utilises the framework of the standard method, including the affordability ratios and urban uplift. It only adjusts the census population in a way that it believes addresses the issue with the census data. Even if HBF were to accept that the longstanding issues with the census data are sufficient justification for a departure from the standard method, as the Council's consultants suggest, the recommendation from the very same consultants is that having updated this data source from 2014 to the 2021 census the framework of the standard methodology should then be applied to this figure. The Council seem therefore to have cherry picked the bits of the consultant report they like and ignored those they don't,			

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						seemingly in a conscious attempt to artificially minimise housing numbers. 40. To suggest that the approach the Council is adopting is a standard method with just a couple of tweaks- using 2021 census figures and removing the urban uplift is entirely disingenuous. The use of 2014 figures and the inclusion of an urban uplift is an integral of the standard method. The Council needs to be clear and explicit in the choices it is seeking to make and apply the tests in NPPF to see if it is justified in doing so. HBF strongly suggest it is not. As such the plan is unsound.			
Stantec on behalf of Segro (ID58)	Ds 1	N		N	Y	POLICY DS1: OVERALL DEVELOPMENT NEEDS 5.1 For clarity, this section considers Coventry City's local employment needs. The need position in Coventry for 'strategic B8' uses is addressed in Section 5. 5.2 Policy DS1 sets out the overall development needs for Coventry over the Plan period (2021 – 2041). It is SEGRO's view that the Policy does not set an employment land need figure based on the appropriate evidence or appropriately plan for enough employment land to meet its needs or detail the agreement from neighbouring authorities to meet the unmet need. Consequently, the Proposed Submission Plan is unlikely to meet the test of 'soundness' as it is not 'positively prepared', 'justified' or 'effective' in		The Alignment Paper provides the updated employment need and supply figure. The evidence base is considered robust. The approach to the shortfall is being discussed with partners across the FEMA and an updated MoU and SoCGs	Further to ongoing discussion under the DtC with partners in the FEMA there may need to be an update to the supply and shortfall figures cited and an update will be provided to the EiP.

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					accordance with NPPF paragraph 35. 5.3 The supporting text to Policy DS1 indicates the starting point for quantifying Coventry's overall amount of employment need over the Plan period is the HEDNA. The HEDNA sets out the employment land needs for Coventry is 8.5 hectares for office space and 147.6 hectares for general industrial uses (excluding strategic B8) which provides a total of 156.1 hectares for the period 2021 – 2041. 5.4 The Employment Land Review (ELR) provides policy recommendations which include updating local policies to reflect current market conditions and the latest quantitative and qualitative employment needs identified in the HEDNA. The ELR therefore follows the recommendation in the HEDNA stating that “For Coventry, more specifically, the employment land need specified for the period 2021- 2041 is 156.1 hectares, comprising 8.5 hectares for offices and 147.6 hectares for general industrial use”. 5.5 The ELR goes on to set out that as of 31st March 2023, the committed employment land supply in Coventry was calculated to be 69.3 hectares. This leaves a remaining need from 2023 to 2041 of 71.3 hectares, consisting of a substantial requirement for 73.9 hectares of industrial floorspace and an indicative oversupply of 2.7 hectares of office floorspace.		will be produced.	

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					5.6 Elsewhere the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper sets out that reflecting the Plan period of 2021-2041, the paper identifies an overall need of 105 hectares, with a supply of 60 hectares, leaving a residual need of 45 hectares. 5.7 Policy DS1 sets out the overall development needs for Coventry over the Plan period (2021 – 2041) and it refers to the 60 hectares of employment land to meet local needs within the City’s administrative boundary but then goes onto to say Coventry’s employment need for the period 2021 to 2041 is for 105 hectares of employment land. The following clarification is provided in regard to this 105 hectares figure: “...It is not possible to deliver all of this additional development land within the city boundary. As such, 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. 4. The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data within 5 years of the date of adoption of the plan to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on that review will commence immediately. Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan			

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					Period in the event of one or more of the following circumstances arising: - a. Through the Duty to Co-operate, the unmet employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities; b. Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed; c. The monitoring of the Local Plan (in line with the Plan's Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan's objectives and requirements; d. Any other reasons that render the Plan, or part of it, significantly out of date." 5.8 It is considered Policy DS1 is not 'effective', as effective joint working on cross-boundary strategic matters has not progressed and the Plan defers meeting this identified need to subsequent development plans. 5.9 The Growth Needs Background Paper confirms the growth requirement figure for Policy DS1 in terms of Local Employment Need is considered to be 60hectares which "reflects the evidence base", leaving a shortfall of 45 hectares. The paper goes on to explain the justification for deviating from the larger HEDNA figure of 147.6 hectares as follows: "At the Regulation 18 stage no 'reasonable alternatives' had been proposed as the only			

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					identified quantum of land needed for employment need was that defined by the HEDNA (2022). As set out above however a significant amount of additional evidence and assessment work was undertaken to review the need and assess the supply and any locational factors involved. Therefore three reasonable alternatives were investigated to inform the Regulation 19 work. For the quantum of growth, the HEDNA figure of 147.6 hectares was tested as this was the confirmed quantum at the time. The figure of 60 hectares was tested as this was an assessed supply figure using up to date evidence (without requiring Green Belt release). A further alternative was tested, which was the 60 hectares supply figure plus an additional 11.81 hectares which reflected a site in the Green Belt which had been put forward through the Call for Sites. As set out in the housing section earlier in this paper, the alternative option for accommodating any growth needs in the Green Belt was dismissed. The figure of 60 hectares was selected as the Preferred Option as, taking into account all evidence (including the various Call for Sites exercises) this was a realistic figure which the Council felt that could be accommodated for local employment need.” 5.10 The decision to select the 60 hectares figure as the Preferred Option contradicts the supporting text of Policy DS1 which states that the starting			

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					point for quantifying Coventry's overall amount of employment need over the Plan period is the HEDNA. 5.11 The explanation provided in the Growth Needs Background Paper seems to suggest that the lower 60 hectares option was selected as a result of the outcome of the Council's Call for Sites exercises undertaken. The result of these exercises determined that the 60 hectares is a realistic figure of employment need: "The figure of 60 hectares was selected as the Preferred Option as, taking into account all evidence (including the various Call for Sites exercises) this was a realistic figure which the Council felt that could be accommodated for local employment need". 5.12 This position seems to conflate employment land need and supply, as it suggests the employment land need figure has been derived from the outcome of the Call for Sites exercises which purpose is to identify new sites to contribute towards employment supply, or in other words, the outcome of the employment land supply exercise has determined which employment land need option has been selected as the preferred option. This is not how employment land supply should be determined, the NPPF is clear that Local Plans should seek to meet the area's objectively assessed needs. This is opposed to determining need based on the available supply in that authority and if identified need cannot be met in that authority it should be met within neighbouring authorities. For			

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						these reasons, it cannot be considered that the Policy is 'positively prepared', as it does not seek to meet the area's objectively assessed needs or is informed by agreements with other authorities to meet the unmet need. 5.13 This view is repeated in the Sustainability Appraisal. The reasons for the rejection of the 147.6 hectares figure option is described in Table 4.7b and is as follows: Response to Coventry Local Plan Review "Rejected as this level of growth cannot be accommodated within Coventry's constrained boundaries" 5.14 SEGRO request that in order for the Proposed Submission Plan to be 'justified' and 'positively prepared' the Council should provide a strategy in the Local Plan Review to meet the area's objectively assessed needs. SEGRO suggest that this strategy should provide an appropriate employment need figure which is based on proportionate evidence and should therefore reconsider the HEDNA figure of 147.6 hectares. Officer comment: See full representation for details.			
KOGG/ Merle Gering (ID32)	DS 1	N		N	Y	It grossly overestimates real deliverable housing need – When you take out PBSA student housing, delivery of family homes has been 671 dwellings/year for the last 10 years – far from either the Hedna or the NSM. Even if the NSM is	Policy DS1 (1a) should consequentially refer to a total maximum of 27,760 additional homes as should Policy H1 as a maximum to be set out in a	The plan has been informed by a robust evidence base and the Council	No change

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					adopted, it can only be an aspirational maximum. DS1 and Overall Need DS3 De facto, Coventry Council discounts environmental and social needs, despite fine words. The council does follow its own policy - Land without planning permission in former green belt areas should be returned to green belt – for green belt reasons, and for a wealth of local policy reasons – concerning biodiversity, heritage, flooding, landscape, transport, amenities [surgeries, schools, retail], climate change. DS3, GE1. Not Sound — not positively prepared] – the revealing slip of the tongue Policy DS1 Overall Development Needs In its own webpage,” About the Local Plan Review” the council talks only about housing and employment. Officer comment: See screenshot in the full representation form submission While Para 1.1 of the draft plan states the council will balance housing, economic, social, and environmental needs, in practice, the council restricts its ‘positively prepared’ obligation to the “housing and employment needs” of the city only, See About the Local Plan Review – Coventry City Council the 4 soundness tests.pdf.. [screenshot above] The NPPF makes no such restriction. While environment and social needs are mentioned elsewhere, in the draft Coventry local plan, in	gently rising housing trajectory from present real levels, net of PBSA, to allow for review of delivery before committing to unneeded development. – Excluding PBSA, real delivery 671 dpa, has been less than half the N S M figure of 1366. Land without planning permission formerly in the green belt until 2017 shall be returned to greenbelt DS1 The NSM shall be reflected in a housing trajectory which is gradually stepped upwards from present levels of real family delivery and will be evaluated every 5 years for market deliverability. Over ambition will be avoided because it damages the environment and causes urban sprawl. Further reasons why land at Keresley should be de-allocated as supported by local plan policy – Officer comment: please refer to original representation for detailed	considers its approach to be justified.	

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						practice the city has subordinated these routinely and regularly since 2017. • EG. Traffic on the A45 being at 150% in the plan period was disregarded in considering major applications at Eastern Green. • Air Quality concerns were swept aside at Kings Hill, even though Coventry has poor air quality, in the worst 30 in the country, by making absurd assumptions about modal shift, [20% drivers leaving their cars] -which have never been seen anywhere in the country • The NHS begs for more surgeries in major local developments, but they are not included. The local hospitals are at 100% of capacity, but still thousands more homes are added to the area • Schools are promised, at the Marconi site, and Banner Lane, but not delivered. At the time of writing, 6 years after major planning permission was first granted in Keresley, there is no agreement for a primary school. • 1000s Planning permissions have been granted even though water assessments show Coventry having a shortage by 2026. • Planning consent at Bunsons Wood required a CEMP and flood prevention measures before the start of construction, but there was no CEMP and local people have been flooded 4 times in recent months.	reasoning and changes which cross reference to other related policies. Land without planning permission formerly in the green belt until 2017 shall be returned to greenbelt DS1 The NSM shall be reflected in a housing trajectory which is gradually stepped upwards from present levels of real family delivery and will be evaluated every 5 years for market deliverability. Over ambition will be avoided because it damages the environment and causes urban sprawl.		

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					The evidence is clear. De facto, Coventry operates a policy of greatly prioritising housing and employment, to the cost of substantial environmental damage and lack of health and education provision. Not Justified- not sound policy DS1 Overall Provision DS1B This plan is not underpinned by proportionate reliable evidence. For the 2017 plan, absurd ONS population projections, of well known unreliability especially for Coventry, were relied upon. The leader of the Council said in public they were “stupid” Now the council seeks to rely on a bespoke population forecast of the future, the HEDNA, which could be just as unreliable as the previous SNPP2014 forecast. Two factors make this a particular risk. 1) The population of the city is volatile - very sensitive to the number of students at the 2 universities, which fluctuate. This year, the number of university students went down by 7500 [data from online and FOI]. 2) We live in a time of population volatility. The New Standard Method, announced in Dec2024, provides a better basis for calculating housing need – which contains up to date evidence – the number of homes and average house prices instead of speculative guesses about future trends in population. We are seeing extraordinary changes in fertility, longevity, and migration at the present time – who could have predicted hundreds of			

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						thousands of Ukrainians arriving and natural increase collapsing to below replacement levels? – Which makes any population forecast or projection particularly treacherous.			
Savills on behalf of Bellway Homes and Merton College (ID52)	DS 1	N	Y	N	Y	Policy DS1 - Overall Development Needs 4.4. The Growth Needs Background Paper was published in November 2024. This Paper concluded that 29,100 homes should be planned for 2021 – 2041 (for which the need can be met in full), plus a 105 ha employment land requirement, of which 60 ha could be met in full, whilst noting that discussions are taking place to allocate the remainder under the duty to co-operate. Bellway Homes and Merton College are concerned that the changes proposed to Policy DS1 are unsound. The reasons for this are set out below. <i>Plan Period</i> 4.5. Bellway Homes and Merton College are concerned that the plan period of 2021 – 2041 is not sufficient in duration. Paragraph 22 of the NPPF (2023) confirms that strategic policies should look ahead over a minimum of 15 years from adoption. The latest Local Development Scheme (December 2024) suggests that the plan will progress through Examination to adoption at the end of 2025. 4.6. However, this seems overly ambitious and very unlikely to match the reality of delays in plan making, which may result in adoption being later	Respondent comment: ‘Please refer to representation’.	The Council considers that its approach is justified being informed by a robust evidence base. It is normal practice for part of a plan period to be retrospective and that with the anticipated timescale the plan will still cover 15 years from adoption.	No change

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					than the end of 2025. Consequently, the plan risks not providing the required 15 year period post adoption. Accordingly, it is recommended that the plan period is amended now. 4.7. In addition, the decision to use a plan period that commences in 2021, and 4 years before plan submission, does not reflect the forward-looking principles that the Government seeks for plan-making. <i>Minimum of 29,100 Dwellings</i> 4.8. It is noted that Coventry are seeking to progress the Local Plan Review under the previous NPPF (2023), which means that the applicable standard method standard at such time utilised the 2014 population projections, plus requiring 35% urban uplift. National policy at such time was clear that the 2014 population projects should be used as the basis for housing needs, unless exceptional circumstances applied which justified an alternative approach. 4.9. Table 1 in the Growth Background Paper summarises the housing needs for Coventry as follows: (Officer comment: please refer to full representation) 4.10. Coventry are suggesting that there are exceptional circumstances to deviate from the standard method (using the 2014 projections) and			

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					instead proposed to proceed with housing needs based on the HEDNA with 35% uplift removed. 4.11. Bellway Homes and Merton College are deeply concerned with this approach. In selecting the HEDNA method with 35% uplift removed, this results in meeting only 74.1% of Coventry's housing need, as set out in the HEDNA method itself. Given that Coventry are proceeding on the basis of justifying that the HEDNA contains the applicable housing need as opposed to the standard method, this would result in meeting below the 80% of such local housing needs claimed by the HEDNA. 4.12. Paragraph 234(a) of the NPPF (2024) on transitional arrangements confirms that 2023 NPPF will only apply where the plan itself meets 80% of its draft housing requirements. Whilst footnote 83 refers to the updated standard method (2024), as Coventry are arguing a deviation from the standard method, it is considered that the 80% of housing needs must therefore be considered against the HEDNA. In this case, this would mean that the transitional arrangements are not met, and therefore the Local Plan Review would need to be assessed against the 2024 NPPF. 4.13. The approach taken appears selective in respect of which elements of national policy the Council wishes to apply or not, resulting in artificially reduced housing requirement. This goes against Paragraph 15 of the NPPF (2023) which is clear that plans should provide a positive vision for			

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					future of each area to meet housing and other needs. 4.14. Ultimately, this conflicts with the objectives of Government in that the Local Plan Review proposes for the draft local plan to be examined under the December 2023 NPPF which is detrimental to housing supply and the proposed housing requirements, not meeting the standard method for local housing need. 4.15. Additionally, this must also be seen in the context of the five year housing land supply position published by Coventry City Council in the 2024 Annual Monitoring Report (dated 18th December 2024), which is only 2.59 years. There is an urgent need to increase the supply of housing in the City to help meet the identified national housing crisis. Additional housing must be planned for. 4.16. In this context, Coventry City Council should prepare a new local plan which adheres to the new NPPF (December 2024) and plans for at least the minimum local housing needs identified using the standard method. This draft Local Plan Review does not do this and instead proposes a housing requirement which will not contribute towards addressing the housing crisis and current under delivery of housing in the City. New site allocations proposed the Regulation 19 document amount to			

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					only 11% of the Housing Land Supply Components (Table 6.1) for the entire 20 year plan period. 4.17. To this effect, it is considered completely inappropriate that Coventry are not looking to proactively plan for housing. Coventry could have reviewed the Green Belt to address the housing and employment land shortfalls (as discussed below) but has chosen not to do so. As such, Coventry have not looked to meet the relevant standard method, nor the 35% urban uplift. This results in conclusion that the plan should be found unsound, as the future development of Coventry has not been planned for. 4.18. Savills previously submitted Land at Rookery Farm, Coventry through the Call for Sites (September 2023). Savills can confirm that Bellway now have an interest in this site, and the site is readily available for a residential led, mixed use development of circa 900 – 1,200 dwellings. This site could play a vital role in meeting the unmet needs of Coventry. 60ha of employment land and delivery of remainder of employment land within the Functional Market Area 4.19. Bellway Homes and Merton College object to the current approach adopted. The Growth Background Paper and the amendments to Policy DS1 set out that there is a need for 105 hectares of employment land, and only 60 hectares can be met within Coventry City's administrative boundary, leaving a shortfall of 45 hectares.			

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						4.20. It is disappointing that Coventry City Council have not considered releasing land in the Green Belt. Land at Rookery Farm was promoted through the Call for Sites for a residential led, mixed use development. Through discussions, it could be that Land at Rookery Farm could meet some of the needs for Coventry. To do so, Coventry City Council need to conduct a thorough and comprehensive review of the Green Belt, instead of relying on outdated paragraph's of the NPPF to avoid Green Belt release. Any future Local Plans or Local Plan Reviews will have to conduct such review under the new NPPF (2024). 4.21. As explained above under the duty to co-operate section and in the Growth Background Paper, there is currently discussions progressing with partners under the duty to co-operate, but no solution has yet been found. It is considered that the current lack of an approach was simply to benefit from the transitional arrangements under the December 2024 NPPF, but ultimately would result in the test of soundness being failed, as set out below. <i>Comprehensive review of the plan within 5 years to assess if a full or partial review is required.</i> 4.22. Given the issues raised above, it is considered that a comprehensive review of the plan must be conducted immediately.			

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						<i>Policy DS1: Test of Soundness</i> 4.23. Bellway and Merton College's concerns relate to whether an Inspector would determine that the Coventry Local Plan Review could be found sound in accordance with the NPPF. More specifically, Paragraph 35 of the NPPF confirms that plans can be found sound when: "a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development¹; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant." 4.24. There are very specific concerns that Policy DS1 will not meet overall development needs, and			

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					will not be found sound in accordance with Paragraph 35 of the NPPF. In particular: ▪ Positively prepared – It is clear that the strategy under Policy DS1 does not meet the area’s objectively assessed needs for housing or employment land. The approach to meeting housing needs ultimately conflicts with the standard method based on the 2014 household projections with 35% uplift. If Coventry are arguing that housing needs should be applied in accordance with the HEDNA with 35% uplift removed, then 80% of the area’s housing needs would not be met. This would mean that the plan cannot proceed under the NPPF 2023, and instead needs to be examined under the NPPF 2024. Additionally, no agreement has been reached with other Authorities to accommodate unmet employment needs. It is considered that the Local Plan Review has not positively considered meeting housing or employment needs. ▪ Justified – Bellway Homes and Merton College do not consider that there has been consideration to an appropriate strategy. Insufficient consideration has been given to Green Belt release, with limited consideration of reasonable alternatives. The current strategy is not justified. ▪ Effective – The Local Plan Review does not effectively meet the standard method housing needs, based on the 2014 housing projects with 35% urban uplift, nor does it present any suitable strategy to accommodate the 45ha of unmet employment land. No statements of common			

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						ground have yet been prepared to demonstrate that cross-boundary strategic matters have been duly resolved. The Local Plan Review as currently drafted does not present an effective strategy to meet housing or employment needs. ▪ Consistent with national policy – As explained above, Coventry are arguing that the Local Plan Review should be assessed under the NPPF 2023, to which the housing needs should be based on the standard method with 2014 housing projections with 35% urban uplift. It is not considered that such deviation from these requirements is consistent with national policy. 4.25. On this basis, it is considered that the test of soundness would be failed as the strategy presented is not positively prepared, justified, effective or consistent with national policy. 4.26. It is recommended that Coventry pause progress with the Local Plan Review and commence the preparation of a new Local Plan under the NPPF 2024.			
Stantec on behalf of HGIT Central Coventry Ltd (ID57)	DS 1			N	Y	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	Please refer to full representation	The Plan has been informed by the Employment Land Review which considers existing employment sites and makes	No change

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						as quantum of floorspace is required to meet the broader objectives of the 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. (Officer comment: Please refer to sustainability appraisal representation)		recommendations accordingly. The Local Plan employment policies are also supportive of modernisation and improvement of employment premises.	
Stride Treglow on behalf of Coventry	3.1 - 3.2 15		Y	Y	Y	The University Group is committed to continual investment in its estate to address the pressures placed upon it by changing student cohorts, societal pressures to activate new academic programmes, and the ongoing transformation in the way it delivers through pedagogical changes.	No modifications are sought. This representation is made in the interests of supporting a positive, justified and effective plan.	Noted.	No change

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univers ity (ID61)						In terms of the wider growth agenda, the University Group wishes to stress that introducing new commercial uses in support of positive placemaking objectives across its City Centre estate remains of interest. The University Group operates in a commercial and competitive UK and increasingly global marketplace and its success in part rests on its ability to collaborate with industry, enterprise and public sector partners. The University Group will continue to work with the City Council to positively and appropriately plan for the incorporation of viable, sympathetic and complementary uses within the City Centre			
Stantec on behalf of Catesb y Estates (ID56)	DS 1	N		N	Y	4.2 Policy DS1: Overall Development Needs Housing Need 4.2.1 In terms of housing, the NPPF (December 2023) sets out in Paragraph 61 that strategic policies should be informed by a local housing need assessment, conducted using the standard method which is an 'advisory starting point'. However, it goes on to explain that there may be exceptional circumstances which justify using an alternative approach. 4.2.2 In Coventry's case, the Coventry and Warwickshire HEDNA (2022) concluded that the population estimates derived from the 2021 Census data had been significantly over-estimated. Coventry City Council has accordingly concluded that exceptional circumstances exist to deviate from the Standard Method because the data upon	Required Changes 4.2.29 In order for Policy DS1 to be considered sound the Council needs to: -Revisit its proposed housing requirement. From our analysis, we believe the housing requirement should be around 3,301 dwellings per annum, or 66,020 dwellings over the Plan period as a minimum, comprised of: - o 1,964 dwellings per annum (HENDA plus 35% urban centres uplift) - o Uplift to support affordable housing delivery within Coventry (uplift to be	The evidence base for setting a housing requirement and addressing its need is considered to be robust and the Council considers its approach to be justified. There is no confusion between 'need' and 'requirement' – the figures are the same as the	No change

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					which the Standard Method was based utilised erroneous data. 4.2.3 Given that new data had emerged since the production of the HEDNA in 2022, Coventry City Council commissioned an update in relation to its own housing need (Review of Coventry's Local Housing Need June 2024) which concluded that the HEDNA remained a reliable basis for plan-making. 4.2.4 The Local Housing Need for Coventry contained within the Proposed Submission Plan is therefore 29,100 (1,455 per annum) and this is reflected in Policy DS1 (as a minimum requirement). 4.2.5 Further commentary regarding the detailed composition of this figure is discussed below in relation to Policy H1: Housing Land Requirements. 4.2.6 It should nonetheless be stressed that that local housing need is not the same as the housing requirement to be set out in the Local Plan. The Council should consider whether it is appropriate to set a higher housing requirement in line with NPPF Paragraph 67. This includes consideration of unmet housing needs from neighbouring authorities and delivering additional development to meet prevailing affordable housing need. These are discussed in turn below.	determined by the Council but for this exercise assumed to be a 20% uplift above local housing need i.e an additional 590 dwellings per annum) o Uplift to support meeting unmet housing need from the GBBCHMA and the CWHMA (uplift to be determined by engagement with neighbouring authorities but for this exercise assumed to be a 20% uplift above local housing need i.e an additional 590 dwellings per annum) o 5% additional allowance for flexibility (5% of 3,144 dwellings per annum [1964 + 590 + 590] = 157 dwellings per annum).	Council is saying it can meet its identified need (as set out in the HEDNA) therefore its requirement would be the same as it is not proposing to export any shortfall to other authorities in the HMA.	

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					<i>Unmet Housing Need from Neighbouring Authorities</i> 4.2.7 There is a catalogue of evidence to document the fact that there are strong functional relations between the Coventry and Warwickshire Housing Market Area ('CWHMA') and the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA'). A number of position statements have been published historically which detail significant unmet housing needs arising from those areas which need addressing in this Plan. 4.2.8 The most recent GBBCHMA Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings with total contributions of only 18,181 dwellings committed. These figures are now out-of-date on account of Local Plan progress and revisions to the calculation of Local Housing Need derived from the Standard Method. However, it is understood that work is underway to update the Position Statement to 2025, and we still expect this work to still identify a significant deficit in supply across the GBBCHMA. 4.2.9 This shortfall should be taken into account in the preparation of the Coventry Local Plan Review. <i>Affordable Housing Need Within Coventry</i> 4.2.10 The Coventry and Warwickshire HEDNA (November 2022) concludes that the analysis identifies a "notable" need for affordable housing, and "it is clear that provision of new affordable			

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					housing is an important and pressing issue in the area". Whilst it does stress that the HEDNA findings do not provide an affordable housing target, the evidence does suggest that affordable "housing delivery should be maximised where opportunities arise". 4.2.11 Nonetheless, Table 8.45 of the HEDNA indicates a total annual need of 2,035 affordable homes within Coventry. 4.2.12 Whilst it is accepted that this does not directly translate into an affordable housing target to be planned for within the Local Plan Review, it remains self-evident that the Local Plan Review will not deliver anywhere near the level of affordable housing identified as being needed within the City. As a high-level example (and notwithstanding comments elsewhere within this Representation) the Council is seeking to deliver 1,455 dwellings per annum. Policy H6 (Affordable Housing) will require 25% of developments on sites of 10 or more dwellings to be affordable. Assuming that all developments will take place on sites of 10 dwellings or more (which they will not), the Local Plan Review would deliver approximately 364 affordable dwellings per year. This represents only a quarter of the need identified within the HEDNA and is realistically an overly optimistic estimate of delivery. <i>Growth Options Tested by the Council</i>			

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					4.2.13 Table 4.2a of the Sustainability Appraisal (October 2024) makes clear that the Council tested five growth options as follows: -Standard Method (2014) – 63,760 dwellings -Standard Method (2022) – 39,280 dwellings -Standard Method (2022) less 35% - 29,100 dwellings -Capacity Led Quantum – 31,500 dwellings -Proposed Standard Method (2024) – 30,540 dwellings 4.2.14 The Growth Needs Background Paper (November 2024), however, makes clear that the Council has only ever realistically considered three options as follows: -Standard Method (2014) – 3,188 dwellings per annum -HEDNA – 1,964 dwellings per annum -HEDNA less 35% – 1,455 dwellings per annum 4.2.15 It is therefore evident that the Council has not fully engaged with the requirement of Paragraph 61 of the NPPF in determining the minimum number of homes needed in order to establish an overall housing requirement. Deviation from the Standard Method 4.2.16 As set out in our previous representation, Catesby Estates recognises the Council’s argument that exceptional circumstances potentially exist to justify using an alternate approach to calculating housing need than the Standard Method (those			

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					circumstances being those relating to the population growth for Coventry appears to be systematically over-estimated, which leads to trend-based projections that are demonstrably too high). This is a locally specific issue that is unique to Coventry. <i>Removal of the Urban Cities Uplift</i> 4.2.17 However, the Local Housing Need figure of 1,455 per annum also serves to remove the 35% Urban Cities uplift that is contained within the Standard Method. With this uplift added, the Local Housing figure would be 1,964 dwellings per annum (39,280 dwellings over the Plan period). 4.2.18 Both the Growth Needs Background Paper (November 2024) and the HEDNA (November 2022) recognise that the Uplift is separate to the Local Housing Need calculation and is a figure which had been applied to the 'top 20' cities by the Government with the intention of increasing housing delivery in those cities considered to be the most sustainable. 4.2.19 Notwithstanding this, the Council has sought to remove the Urban Cities uplift from its overall housing requirement, arguing: <i>"...the NPPF (either 2021 or 2023 iterations) makes no mention of an uplift when applied to a justified alternative approach, but states that any alternative approach must reflect 'current and future demographic trends and market signals'</i>			

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					(NPPF 2021 and 2023, para.61), which the HEDNA has done.” “...as set out in the PPG, any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method. Therefore, whilst the HEDNA included a 35% uplift this was a separate figure unrelated to local need, and the Council retains its stance that the imposition of the uplift (to the national Standard Method) does not mean that it is fair, evidenced, reasonable or justifiable. The 35% uplift figure was included in the HEDNA which followed the calculation steps of the Standard Method, but notwithstanding this the HEDNA methodology is a separate, and alternative approach which is justified in its own right in terms of identifying local need.” 4.2.20 It is submitted that the Council’s approach to calculating its overall requirement is incorrect, principally due to a conflation between housing need and a housing requirement. 4.2.21 The Council themselves recognise that, whilst the 35% uplift does form part of the Standard Method calculation, it is nonetheless separate to the initial calculation of Local Housing Need. The Council has nonetheless used the same justification (that there are issues with the data for determining initial local housing need) for not			

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					applying the uplift which ultimately results in the overall housing requirement. 4.2.22 In this vein, whilst Paragraph 61 of the NPPF does allow for exceptional circumstances which justify an alternative approach to assessing housing need, including local demographics, Paragraph 61 does not allow for a complete deviation away from the Standard Method when considering the overall housing requirement. This is evident from the final sentence of Paragraph 61, which states: <i>“In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”.</i> 4.2.23 Whilst this Paragraph is predominantly discussing unmet needs from neighbouring areas, the phrase “in addition to the local housing need figure” is clear that all of the proceeding text only applies to the calculation of housing need, whereas the Urban Cities uplift is applied on top of the local housing need figure to provide the overall housing requirement. 4.2.24 This is also established by Paragraph 62 of the NPPF which goes on to state: <i>“The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban</i>			

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					<i>centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework.”</i> 4.2.25 The fact that Paragraph 62 is separate from the preceding paragraph again emphasises the fact that the urban cities uplift is entirely separate and should be applied in addition to the local housing need figure, which in this case is derived from the HEDNA. 4.2.26 Put simply, the HEDNA potentially provides justification for utilising an alternate approach in respect of calculating need at the local level. It does not provide justification for deviating away from the 35% uplift, which is an uplift applied nationally as part of a growth agenda i.e it is not unique to Coventry. If it was sufficient to not provide the 35% uplift because it was felt that it was not “fair, evidenced, reasonable or justifiable”, then none of the top 20 cities subject to the uplift would have provided it. 4.2.27 It is therefore clear that the Council has erroneously calculated its overall housing requirement, which should instead be 1,964 dwellings per annum (39,280 for the plan period 2021 – 2041) as a minimum, exclusive of any additional buffer or allowance for economic growth or market competition. Soundness			

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						4.2.28 It is therefore evident that Policy DS1 is not sound, as it is not: -Positively prepared – the overall levels of growth fail to meet Coventry’s local housing need in a number of aspects. -Justified – the overall levels of growth are not sufficient and do not take into account or consider reasonable alternatives. -Consistent with National Policy – the overall level of growth is not consistent with national policy in its approach to quantifying an overarching housing requirement. Officer comment: please refer to full representation report for appendices and further information			
National Highways (ID36)	DS 1	Y	Y	Y	N	Local Plan Overview We note that the CCC adopted its current Local Plan and accompanying Area Action Plan (AAP) for the City Centre in December 2017. We acknowledge that the Local Plan is getting updated as part of the 5-year review process to understand the amendments/ updates required for the adopted documents. The Regulation 19 (Proposed Submission) consultation document outlines the overall development needs for CCC in Policy DS1, and the requirement to deliver a minimum of 60ha of employment land to meet local needs within the		Comments noted and discussions ongoing in regard to the modelling, see DtC compliance statement. An update will be provided to the EiP.	No change

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					city's administrative boundary and 1,455 dwellings per year, which equates to a total of 29,100 additional dwellings over the plan period of 2021 to 2041. These include some of the following key sites in the vicinity of the SRN; • Keresley Sustainable Urban Extension (SUE) (site ref, H2:1) – up to 3,100 dwellings; • Walsgrave Hill Farm (site ref. H2:3) – up to 900 dwellings; and • Land at Whitmore Park, Holbrook Lane (site ref. H2:4) – up to 730 dwellings. NH have reviewed the Local Plan document, and we have also reviewed a number of complimentary reports which are set out as follows: • Infrastructure Delivery Plan (Appendix 7); • Transport Background Paper (November 2024); • Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) (November 2022); • Review of Coventry's Local Housing Need (June 2024); and, • Transport Modelling Technical Note - CASM 2041 Local Plan (November 2024). In principle NH broadly welcomes developments within the existing urban area. Trips generated by			

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					developments within this area have the possibility to remain internal to the town and/or make use of sustainable transport options and therefore may have a smaller impact on the wider SRN than development in alternative locations. However, larger key sites, still have to be considered on their own merit and assessed accordingly to consider their impact during the construction and operational phase. Furthermore, NH supports development on the rail transport corridor and other public transport developments which could encourage longer distance trips to make use of more sustainable methods of transport and therefore alleviate the pressures posed by new developments on the existing SRN and therefore reducing the need for interventions/ mitigations to support the proposed growth. NH, therefore, considers that a well-integrated and significant sustainable transport provision is essential to ensure that these sites as well as those in relatively isolated areas do not become overly reliant on car use. <i>Policy Review</i> National Highways have undertaken a high-level review of the policy wording of the larger sites which may have an impact on the operation of the SRN, specifically focusing on the sites which are strategically located in closer proximity to the SRN.			

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					These include some of the following key employment sites in the vicinity of the SRN; • Binley Business Park; • Cyan Park; • Swallowgate Business Park; and, • Whitley Business Park. Upon the review of the Employment Land Review, the document states “87% of the current committed employment land supply is on allocated sites without planning permission. These sites were allocated in the current Coventry Local Plan which was adopted in 2017. In reviewing whether it is appropriate to carry these existing allocations forward to the emerging Local Plan, the Council should reassess their suitability, deliverability and alignment with the overarching spatial strategy”, Furthermore, the total land need set out in the HEDNA (2022) states a requirement of 156ha over the emerging local plan period, up to 2041, of which 71ha has not yet been planned for. NH would like to understand how the allocated sites have been incorporated into the modelling and what approach has been used to assess the further need which is required by 2041. We would promote ongoing discussions to understand the allocations which will be put forward as part of the updated local plan.			

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						It should be noted that any potential site identified through the Local Plan process, which is anticipated to have an impact on the SRN in the area should be subject to consultation with National Highways, and appropriately assessed in line with the DfT's Circular 01/2022 to determine the extent of their potential impacts on the SRN in the area. Further to this, it is to be noted that the cumulative impact of the proposed site allocations also needs to be undertaken in line with the Circular for understanding the likely traffic impacts on the SRN in the area in terms of capacity and safety, and, identifying any possible mitigation measures (if required).			
Amanda Davies (ID2)					Y	The original Local Plan used ONS population figures which have now been exposed by the Coventry and Warwickshire HEDNA as 'erroneous'. For many years residents and groups had repeatedly asked Coventry City Council to review these 'significantly over-estimated' figures and they were not only ignored but the review of the plan, despite having access to Census figures to prove the errors, was delayed another year, allowing for even more developments to take place, further decimating the green belt in north west Coventry. These developments continue to describe applications as 'much-needed housing'. Allesley parish in Coventry North West is one of the only remaining areas of green belt in Coventry. It is also one of the few areas in the city which is a rural		Noted however the plan has been informed by detailed evidence and the approach is considered to be sound.	No change

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					environment, of quality farmed fields with small pockets of woodland, heritage trees and hedgerows – surprisingly natural and unchanged for 500 years, despite being book-ended by the Keresley and Eastern Green’s SUEs. This area of suburban fringe is fighting to retain this very special environment within an urbanised city but the relentless pressure of surrounding development is as harmful as destroying the fields and farms. The Keresley and Eastern Green SUEs and the unsustainable infrastructure, described by the Planning Lead as ‘a mess’ are having a detrimental impact on much of Coventry North West. The relief road which begins this year and will promise traffic misery for many, will not be resolved upon its completion as more and more developments in the Keresley and Eastern Green areas are completed and populated. Cycle routes are ideal for leisure but no replacement for cheap/free, efficient public transport, which is still severely lacking in the area. New residents will continue to drive cars, despite the traffic jams. The lack of any masterplanning suggests more of the same with the new plan. Coventry City Council continues to insist they welcome engagement with the review of the plan, but this requires a concerted effort to listen to residents and heed genuine, concerned responses to issues which have a detrimental impact on those who live in this area of the city, rather than			

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						imposing a new plan without consideration of those who will be most affected by it.			
Coventry and Warwickshire Growth Hub (ID9)	DS 1				Y	In terms of the provision of employment land, the Growth Hub considers that this key policy is unsound and it also appears to fail to comply with the Duty to Cooperate provisions as set out in national planning guidance. The Councils draft policy does not seek to provide the estimated requirement for new employment land over the plan period as identified in the text (ref DS1(3)). This in effect undermines much of the economic vision and ambition set out in the Plan's strategy as set out in the introduction for the draft plan and expressed through the One Coventry Plan 2022-2030. The Growth Hub considers that for some time the commercial market in Coventry has been characterised by shortages of suitable and affordable accommodation and land opportunities. The 2019 C&W Market Signals Report indicates that there are a range of shortages in key sectors of the local economy, in particular for smaller more affordable premises. These Local Plan proposals will undermine the current local economy and hold back local growth. In view of how commercial markets operate, the absence of new allocations will impact across the whole market operation for the provision of land and buildings. In turn, both existing business and potential inward investment companies will continue to suffer the lack of choice and shortages	The modification necessary to make this Policy sound will be for the Council to set out a commitment to provide all its employment land needs (as defined by Iceni study) within its boundaries or alternatively the Council should publish hard evidence jointly with its neighbouring authorities to explain how any "exported" growth can be accommodated both in locational and timing terms. The draft plan must also address with more precision and detail the issue of how Coventry's share of the overall sub regional need is to be accommodated and brought forward within the plan period. Currently the strategic "big box" need calculated by Iceni is characterised by a very wide range between 136-311 ha across the sub region (para 5.14). This in the context of this plan needs to be narrowed down	Work is ongoing under the DtC with FEMA partners, including opportunities from recycling / modernisation of premises and an update will be provided to the EiP. This will also include an updated position on discussions with partners and ongoing work on other Local Plans in the FEMA	Potential modifications to supply and shortfall figures in the local plan to reflect ongoing DtC discussions with the FEMA LPAs.

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					of suitable premises, which as evidence suggests characterises the current commercial markets across Coventry. The CW Growth Hub is disappointed in the Councils overall approach to economic growth which appears to contradict many its stated objectives for creating a vibrant and growing local economy and the stated ambitions for the wider sub regional economy. An alternative strategy based on a review of Green Belt boundaries would, in the opinion of the Growth Hub be able to identify sufficient land to meet the projected shortfall without compromising the key functions of the local green belt boundaries. Moreover, as an alternative there are strategic areas in the land immediately adjoining Coventry's boundaries which could provide further alternatives to accommodate growth . This would require coordination and partnership working by all the local authorities in C&W. This practical option to accommodate Coventry's growth does not appear to have been contemplated and properly examined.	and much greater clarity provided .		

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Tina Ford (ID66)						Please stop allowing our green belt to be eliminated on all sides and ensure that we protect ancient trees, hedgerows and wildlife from destruction, as has been allowed in the Eastern Green developments. These developments were not needed, due to errors in population data, as noted And, if it was to provide low cost housing, why is most of the development just huge and expensive houses being built on small plots with very small gardens, that are very overpriced and overlooked on all sides. Which they are struggling to sell, as have electric pylons in very close proximity. Which was linked to increased cancer rates, so not really surprising. Also, the development of student housing in the city centre also reduced the need for private housing, which opened up more of the property market. We have lost environments we can't get back, so please be more mindful when planning for the future, when our countryside is gone, it's too late.		The Plan Review is not proposing to release Green Belt and polices are being introduced in regard to managing the growth of student accommodation and ensuring a range of house types to meet the needs of the population over the plan period.	No change.
Warwick District Council and Stratford District Council (ID70)						Housing Paragraph 3.10 of the consultation identifies a Local Housing Need of 29,100 for the proposed Plan period (2021-2041). This equates to 1,455 new homes per annum and the City Council has stated that this will be delivered fully within Coventry's administrative area through an urban and brownfield-focused strategy of allocations and densification. We agree that the Coventry & Warwickshire Housing and Economic Development Needs		Comments noted, and the Council is working with its partners in the HMA and FEMA to produce an updated MoU along with Statements of Common Ground	No change

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					Assessment (HEDNA) 2022 is an appropriate assessment upon which to basis decisions upon housing need for plan-making for the City. We generally support the detailed justification for this as set out in the Overall Levels of Growth Background Paper which is listed as supporting evidence base that has informed the Local Plan review. However, we would note that the HEDNA proposes a figure of 1,964 dwellings per annum for Coventry. Paragraph 3.26 of the evidence document, 'Review of Coventry's Local Housing Need' produced by Icenl in 2024, indicates that the figure of 1,455 is simply the HEDNA figure minus the 35% urban uplift applied to the largest cities nationally. Whilst WDC and SDC agree with the City Council that the 35% urban uplift applied to the largest cities nationally is arbitrary and not evidenced, we would highlight the potential incompatibility of the approach to progress the Plan Review under the transitional arrangements and therefore a previous version of the NPPF that includes the urban uplift, rather than the updated NPPF where it has been removed. There is a danger that this may be considered to be 'cherry picking' which elements of national policy should be applied. Notwithstanding that the City Council is preparing the Local Plan Review under the NPPF transitional arrangements and thus preparing the plan in			

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					accordance with the 2023 version of the NPPF, we note and support the fact that at the time of writing, delivery of 1,455 dwellings per annum is greater than the figure (1,388) that would be required by applying the new national Standard Method for assessing housing need. The South Warwickshire authorities (WDC & SDC) welcome the urban and brownfield-focused strategy of allocations and densification, which means that Warwickshire authorities will not be asked to take on any unmet housing need from Coventry, as was the case in the last round of Local Plan reviews. We are therefore satisfied that the City Council is planning to meet its needs as per the HEDNA, which is also higher than the Local Housing Need identified for the City under the new standard method. Employment Land WDC and SDC support the Coventry & Warwickshire HEDNA (2022) as being the starting point for the City Council to identify its employment land needs. We also support the consideration of the West Midlands Strategic Employment Sites Study (WMSESS) (2024) that considered the needs of large-scale warehousing and logistics and the subsequent Alignment Paper (2024) that ensured all evidence was consistent, up-to-date and to identify the employment needs of the city, Warwickshire authorities and identify any residual need. It is acknowledged that the City			

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					Council has undertaken multiple call for sites exercises and an Employment Land Review (2024) before concluding it is unable to accommodate all of its employment growth need within the city. In summary, paragraphs 3.14 and 3.15 of the consultation document identify that: • Office needs – the City Council can accommodate its own office needs, primarily but not exclusively within a revised Friargate allocation in the city centre • Local Employment need – Taking into account supply, completions and allocations, the Council is able to accommodate 60 hectares of local employment need (Use classes E(g) (iii), B2 and B8), with a remaining shortfall of 45 hectares which it is not able to accommodate within its own boundaries • Strategic need – One allocation, Baginton Fields, can contribute towards these needs (25 hectares in size). Paragraph 3.15 highlights that Coventry, being a constrained area, has no further opportunities to meet this need. Paragraph 3.15 is correct in that it does highlight that the City Council is discussing these matters with Duty to Co-operate partners. These discussions are ongoing and both Warwick District Council and Stratford-on-Avon District Council will continue to fully contribute to such discussions.			

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					In discussing potential opportunities for the South Warwickshire local authorities to meet any unmet employment need from Coventry, the following must however be acknowledged: • that the housing and employment needs of WDC and SDC are themselves extensive - o Housing – the updated Standard Method has resulted in significant increases in local housing need for both authorities (63% increase for WDC and 104% increase for SDC) in comparison to a considerable reduction in Coventry’s figure (55% reduction). The HEDNA had also identified notable increases for the South Warwickshire authorities - o Employment - A substantial amount of employment land need has been established as being required in South Warwickshire and we would note that the most significant strategic sites need is in Area 8 (of the 2024 WMSESS), covering Warwick and Stratford-on-Avon Districts for 75-125 hectares • that large areas of South Warwickshire are constrained by Green Belt and the Cotswolds Area of Outstanding Natural Beauty.			

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West Midlands Resource Technical Advisory Body (WMRTAB) (ID73)	DS2				N	The West Midlands Resource Technical Advisory Body (WMRTAB) was formed in 2011, and its overarching aim is to support co-operation between Waste Planning Authorities (WPAs) and others in the West Midlands, by providing objective and authoritative technical advice concerning the sustainable management of material resources, strategic waste management data, and related issues in particular those related to development policies and proposals. Furthermore, WMRTAB helps WPAs meet their obligations under the Duty to Cooperate for plan making. A copy of the Terms of Reference for WMRTAB is included as Appendix 1 and this lists the members of WMRTAB. The Coventry Local Plan (CLP) area is located wholly within the area covered by WMRTAB and it would therefore like to offer observations on the Regulation 19 Proposed Submission Version⁴ Coventry Local Plan as set out below. These observations have been agreed by members of	Details of engagement with neighbouring waste planning authorities concerning the import and export of waste to and from Coventry anticipated over the Plan period should be included in the Duty to Cooperate Statement. Statements of Common Ground (SoCGs) may be needed to formalise agreements with neighbouring Waste Planning Authorities regarding long-term waste management planning.	Noted – see DtC compliance statement, agreed that policy remains up to date and that the IDP will reflect changing circumstances through the plan period.	No change

¹ <https://www.coventry.gov.uk/planning-policy/local-plan-review/4>

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						WMRTAB and are submitted by Cool Planet Resources Ltd which is contracted by WPAs in the West Midlands to provide support to WMRTAB. Please note that this submission represents an officer level, technical response only and is made without prejudice to any comments that individual members of WMRTAB may make on the Regulation 19 Proposed Submission Coventry Local Plan. For the avoidance of doubt, any responses submitted by individual members to this plan take precedence. Duty to Cooperate WMRTAB is pleased to confirm that Coventry City Council is an active member of WMRTAB and a senior planning officer from the Council regularly attends the group's meeting and contributes to its work. WMRTAB has therefore facilitated discussion between Coventry City Council and other neighbouring waste planning authorities to assist with meeting its Duty to Cooperate (DtC) on matters pertaining to the planning for waste management. Furthermore, Coventry City Council is a signatory to			

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						the WMRTAB Statement of Common Ground (September 2022).			
Define Planni ng & Design Ltd on behalf of Willia m Davis Home (ID14)	DS2	N	Y	N	Y	The Councils commitment to continue working with other Authorities in the HMA to support the delivery of sufficient housing and other development to meet identified needs is supported. However, the Regulation 19 Plan and its supporting evidence sets out an unmet employment need and does not meet its own affordable housing needs. Whilst it is recognised that growth around the City is constrained by Green Belt, national policy is clear that the Council should identify a sufficient amount and variety of land to meet their needs as far as possible, before exporting to neighbouring authorities. The Council have clearly failed to do this in single-mindedly selecting the lowest housing requirement without demonstrating exceptional circumstances; and following a brownfield development strategy for the Review without appropriately considering the viability and technical	The housing requirement and allocations must be reviewed to go further in meeting Coventry's own needs. Additional evidence must be provided that other authorities in the HMA are able to and will contribute towards Coventry's unmet needs. The Council must review any unmet needs in the wider area and clearly set out how they will or why they cannot contribute towards them.	The housing requirement has been informed by robust evidence and the strategy for accommodating housing growth is considered sound.	No change

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						constraints of these sites and the benefits that releasing Green Belt sites could deliver for housing and infrastructure needs. In addition, the Duty to Cooperate Statement does not provide any evidence that these unmet needs can and will be accommodated within neighbouring areas, nor do any of the other published evidence documents. The Duty to Cooperate Statement should evidence that other authorities can and will contribute to unmet needs. However, it appears to be silent on the matter of affordable housing delivery and confirms no solution has yet been agreed in relation to employment land needs. As such, the Plan is clearly not compliant with the Duty to Cooperate nor has it been positively prepared as required by National Policy.			
Nurton Developments Ltd (ID45)	DS2	No response	No response	N	Y	NDL welcomes the commitment of the City Council to support the preparation of joint strategic evidence to enable the successful delivery of regeneration and economic growth across the subregion (Item 3 of Policy DS2). This includes support to deliver new sustainable development	For the reasons set out in response to Question 5, NDL considers this development opportunity north of Coventry has the potential to contribute significantly to the sub-	Noted. It is not considered appropriate to list North of Coventry in DS2(6) as the	No change

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						that may straddle or adjoin the City's administrative boundaries (Item 4). Moreover, Item 5 to Policy DS2 states that the Council will continue to work proactively with all relevant partners to enable the delivery of new development on sites that cross or are adjacent to administrative boundaries. Item 6 then refers to a number of sites which contribute to the subregional economy. These include some outside the City's boundaries as follows: - • The University of Warwick (in part). • Coventry Gateway. • Ansty Park. • Proposed residential developments to the south of Coventry. NDL supports this overall approach. Much of Coventry's recent growth has taken place, by necessity, outside the City's boundaries. Other examples include Prologis Park at Ryton-on-Dunsmore, the proposals for the Gigafactory at Coventry Airport, and Frasers' recent planning	regional economy. Specifically, it will help to meet the needs for large scale industry and warehousing in the medium to long term and enable the sustainable growth of Coventry. As such, NDL contends that North of Coventry should be added to those already listed under Item 6 of Policy DS2.	land lies in other local authority areas and would be subject to their own Local Plan processes in terms of whether or not it is selected.	

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						permission for its proposed HQ campus at Ansty. We see this trend continuing for Coventry to grow. NDL is promoting a strategic employment site just to the north of the City's boundaries, with this land falling in Nuneaton & Bedworth and North Warwickshire. The red line plan below shows the site's location and extent. The site measures just over 100 ha and straddles the boundary between Nuneaton & Bedworth and North Warwickshire. 78.36 ha falls within Nuneaton & Bedworth. The balance – 25.51 ha – falls within North Warwickshire. NDL submitted responses to "call for sites" exercises run by both Nuneaton & Bedworth Borough Council and North Warwickshire Borough Council last autumn. These submissions can be provided on request.			

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						The promotion of this strategic employment site responds to three particular issues and opportunities: - • The recognised shortfall of employment land, particularly for strategic industrial and warehousing land, serving Coventry, Nuneaton & Bedworth, North Warwickshire and the wider sub-region, against predicted need and demand. • Consideration being given by relevant decision-making bodies to major investment in transport infrastructure to enable the future growth of Coventry and its economic hinterland. • Balancing of future growth of Coventry so as to be located in the areas of greatest need. The first point is considered in the separate representations we make in respect of Policy DS1 and paragraph 5.14 of the draft Plan. These argue that the identified residual need for new employment land, for both local need and sub-regional need, has been significantly underestimated			

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						and will act as a barrier against future economic growth. With regard to the second point, an outline business case to the Coventry North Transport Package was submitted by Coventry City Council to the West Midlands Combined Authority in April 2022. It confirmed that currently funded interventions only deal with planned growth and that significant new infrastructure will be required to enable and deliver future growth. It recommended that longer term major schemes should be investigated. Specifically, a new link road, west of Coventry, connecting the A45 to the M6, was recommended for further study. One of the options includes a new junction on the M6 at Corley Services. The potential for a new junction here was also identified by the WMSESS of May 2021. This new junction would unlock potential development land to the north and west of Coventry. The site NDL is promoting can be accessed off this new junction, with this land forming a natural extension to the City			

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						up to the M6 motorway. It could deliver c. 400,000 sqm (4.5 million sqft) of floorspace of large floorplate buildings suitable for manufacturing, logistics & freight and data & energy storage. With regard to the third point, large scale industrial and strategic warehousing development to the west and north west of Coventry would balance the recent and current planned growth of Coventry to the south (Coventry Gateway and the Gigafactory at Coventry Airport) and the east (Ansty Park and Frasers), which are served by the A45 and A46 respectively. Instead, it would focus development in areas of relative deprivation in north Coventry and Bedworth and help to level up the local economy. The site is in the initial stages of promotion. NDL is about to undertake a detailed technical assessment of the opportunity the site presents and engage with relevant decision makers and stakeholders. This will include the City Council, Nuneaton & Bedworth Borough Council, North Warwickshire Borough Council, National Highways, Warwickshire County			

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						Council and West Midlands Combined Authority. This will lead to a refinement of the proposals and a more detailed view of the timescales for delivery. However, it is clear, even at this early stage of promotion, that the site is strategically well located to meet the employment land needs of the City and its subregion.			
MSP+ D Ltd (ID35)	DS2 and Para 3.16	N	N	N	Y	The submitted Regulation 19 Coventry City Council Local plan policy DS1 “overall Development Needs, bullet points 3 and 4, are not legally compliant, sound or comply with the Duty to co-operate because: 3. Local Plan Review – Duty to Co-operate Statement. Page 11 of this document states that: <i>“As with Housing, the HEDNA was the starting point for assessing employment need. However work was also ongoing across the wider West Midlands region in terms of assessing strategic site (ie ‘big box’) needs as this has different site and locational requirement to local employment provision. The</i>	To make the Coventry City Regulation 19 Local plan sound, the following changes are required to the submitted Reg 19 Coventry City Plan. 7. At least 45 hectares of land for employment use needs to be also allocated outside Coventry’s administrative boundaries. This excludes additional employment land required to meet strategic “big	Discussions are ongoing, noting that the local authorities working together under the DtC are at different stages in plan preparation. This will be evidenced through an updated DtC statement and	May be changes to supply and shortfall figures as a result of ongoing discussions with FEMA partners under the DtC, an update will be provided to the EiP.

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						<i>West Midlands Strategic Employment Sites Study (WMSESS) was finalised in September 2024, the result of a partnership of those authorities engaging in the West Midlands Development Needs Group referenced earlier in this paper. This details 'opportunity areas' for further exploration, and for Coventry this relates to 'Area 7' which will primarily relate to further joint working with Rugby Borough. Coventry is highly constrained and has no new sites which would meet the criteria set out in the study therefore discussions will be required as Rugby progresses its local plan.</i> <i>On this particular (employment) issue, the total local need figure for Coventry for the period 2021-41 was calculated to be 105 hectares. From this Coventry had a supply of 60 hectares and a residual need of 45 hectares. Despite repeated Call for Sites, Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it is unable to accommodate a 45 hectare shortfall. It has also made them aware that a Green Belt site (11 hectares developable to the east of the city) is being</i>	box" needs of the sub region. 8. Statements of Common Ground between Coventry City Council and Coventry's neighbouring Local Planning Authorities need to be prepared and proposed sites subject to separate public consultation, identifying major new employment sites which will meet both Coventry's and the West Midlands employment needs both within and also outside Coventry's administrative boundaries. 9. These sites then need to be identified within the Reg 19 Coventry Local	associated SoCGs.	

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						<i>promoted but that it has been rejected through site assessment.</i> <i>Discussions are ongoing through CSWAP0 and with the linked duty to Co-operate Group and associated Local Authorities in regard to this matter, but this currently remains an outstanding issue that has not yet been resolved. In part this is because most partner authorities are at earlier stages of plan preparation.</i> <i>The authority is continuing to work to develop an MoU with partners and working to establish Statements of Common Ground.</i> 4. The HEDNA Alignment Paper Considers that Coventry City Council should provide 105 ha of new Employment Land (B2 and B8) excluding any contribution to the strategic “big box” needs of the sub-region. Planning Assessment	Plan and also in the forthcoming neighbouring Local Planning Authority’s Reg 19 Development plan reviews for submission in 2025/26. 10. If Statements of Common Ground identifying major sites which can deliver the shortfall of employment land cannot be agreed between Coventry City Council and the adjacent Local Planning Authorities then there needs to be a new employment policy within the Reg 19 Coventry City Local Plan. 11. This new employment policy would support new employment site allocations on sustainable		

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						Paragraphs 24-27 of the NPPF of December 2023 sets out National Planning policy relating to maintaining effective co-operation in the plan making process, including the need to provide Statements of Common Ground. The Regulation 19 submitted plan's evidence base does not provide Statements of Common Ground with Coventry's adjacent Local Planning Authorities which specifically identifies employment site allocations for employment uses which meets the shortfall of employment land of 45 hectares so as to meet Coventry's employment needs either inside or outside its administrative boundaries – as well meeting strategic “big box” employment needs of the sub region.	development sites within close proximity to the City's own administrative boundaries which can deliver both Coventry's and the sub regions employment needs. 12. To deliver the acknowledged shortfall of employment land, the Coventry Local Plan also needs to have a policy which states that the green belt boundaries of all of Coventry's adjacent Local Planning Authority's need to be reviewed in order to help the delivery of major new employment sites.		

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							13. Some of the identified new major employment sites will therefore need to be released from the green belt because there is evidence that there are “exceptional circumstances” to do so and the these sites also no longer meet green belt designation criteria or are identified as “grey belt sites” in accordance with the NPPF of December 2024.		
Brinklow Parish Council (ID4)	DS2 and para 6.11 (scale of housing)	N	Y	N	Y	This late application has been actioned because on Friday 28th February we found that Rugby Borough Council had released its 119 page document entitled ‘Rugby Borough Local Plan’. Contained within the document were claims that RBC were proposing to build 1300415 houses homes before 2045. It appears that there has been an agreement between	Coventry City Council will work with neighbouring authorities within its Housing Market Area to provide for some of the housing needs of those authorities where they have a requirement higher	It is not understood what is meant by ‘late application’ as the representations	No change

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	ng devel opment)					Coventry City Council and Warwickshire, Rugby and Nuneaton to build on Coventry's behalf, because the figures developed by Coventry were vastly inflated by including the student population. It is our opinion that the figure of 13,000 homes may well include many offered y Rugby to Coventry when the figures were so wrong. The figure of 13,000 homes means that Brinklow, a village of 411 houses will be swamped by a development of at least 415 houses on two central village sites. We don't have ANY services which will cope with this increase. Under policy DS2 Coventry has a duty to cooperate and partnership working. We do not believe that this has happened between Rugby Borough Council and Coventry Council.	than their land supply while Coventry has housing land supply in excess of the requirements set by both the HEDNA and the December 2024 NSM	were received on time. Coventry City Council and Rugby Borough Council have worked together with other authorities in the Housing Market Area and through the Local Plan review Coventry considers it can meet its own housing need.	
Savills on behalf of Crest	DS2	N/A	N/A	N	Y	The Regulation 19 consultation document (paragraph 3.9) proposes that the Coventry City housing need will be met in full within the Coventry City administrative boundary through an urban and	Policy DS2 should be specifically and clearly recognising the need to meet some of its (increased) housing target on a cross-	CCC considers that its housing requirement and site selection	No change

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Nicholson (ID53)						brownfield-focused strategy of allocations and densification. It is recognised that the proposed approach to housing delivery in Policy DS2 is supported by the NPPF, which encourages (including at paragraphs 8, 11, 62 and in chapter 11) making effective use of land and optimising densities. Nevertheless the NPPF (including at paragraphs 16, 35 and 75) stresses that Local Plans need to be deliverable. This deliverability applies to the housing sites upon which the Local Plan is reliant in order to meet the housing target. Crest Nicholson has a concern that not all of the sites within the Coventry City administrative area which Coventry City Council is relying on to meet the housing target (as identified within the HELAA) will be deliverable within the Plan period. As identified within the response to proposed Policy DS1 some allocated sites and sites with planning permission will take longer to be developed than	boundary basis within neighbouring LPA areas, including within Warwick District. It is noted that the proposed Strategic Policy GB2 recognises the contribution that land to the south of Westwood Heath Road, which is currently safeguarded for development in the future, could make to the housing land supply if required. Crest Nicholson considers that similar recognition should be given to the contribution to the housing land supply that can be provided by land to the south of Westwood Heath Road in Warwick District which has already been removed from the Green Belt to assist with meeting a	processes are sound.	

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						expected and some allocated / committed sites may even not be constructed during the Plan period. In order to ensure that the Local Plan is effective, justified and consistent with national planning policy it is accordingly important for the Local x DS2 Plan to allow for an additional 'buffer' in setting the housing requirement for the Plan period to ensure that there is sufficient variety in the size and number of housing sites allocated and delivered to enable the Coventry housing need to be met and to facilitate the delivery of additional affordable housing. In this regard Crest Nicholson considers that the Coventry Local Plan should be seeking to meet a higher housing target than its minimum housing need. The NPPF advocates cross-boundary working (including at paragraphs 21, 24, 27 and 35) and the role that strategic policies play in addressing this. Given the constraint to further expansion provided by the Coventry City administrative boundary the Local Plan, Policy DS2 should accordingly be actively recognising the need to meet some of its housing target on a cross-boundary basis within	Coventry City housing requirement.		

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						neighbouring LPA areas, including within Warwick District.			
C&W Chamber of Commerce (ID8)	DS2 and Para 3.16 onwards	No response	No response	No response	Y	As noted in the response to JE1, the Chamber of Commerce considers that across all local authorities in the Coventry and Warwickshire (CW) sub-region there is a lack of transparency and information related to the Duty to Cooperate. This makes it difficult, if not impossible, to judge how this statutory obligation is being discharged in relation to Coventry and its neighbours. For this reason, the Chamber considers that the draft policy is not legally compliant or indeed sound. The broad sentiments set out in this policy framework are welcomed. We note the commitment of the City to partnership working but see little or no evidence of such work or regular engagement to date to substantiate the draft policy and its supporting statements. It is recognised and established that the CW sub-region is a relatively well contained Functional	The Chamber is aware that correcting deficiencies in the Duty to Cooperate process cannot be done by use of the formal Modifications process either during the later stages of the plan. or by the inspector/examiner after any examination stages have been concluded. However, such is the fundamental deficiency of the approach as set out in the strategy, it is the Chamber's current view that unless this is effectively addressed before the submission to the secretary of state then the plan must be rejected and the Council directed to prepare a	Discussions are ongoing, noting that the local authorities working together under the DtC are at different stages in plan preparation. An MoU and SoCGs are being produced. See DtC Compliance Statement which evidences the ongoing work.	No change

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						Economic Market Activity Area (FEMAA). It does not seem technically difficult to resolve issues related to the distribution of strategic employment growth. However, no substantive information is published regarding what measures of agreement have been reached. The draft policy DS2 relies heavily on the assumption that Coventry's unmet employment provision in relation to both strategic (large scale) and local employment provision will be exported to and accommodated in surrounding local authorities. At the time of this response, it has been confirmed that no formal agreements or related arrangements to make provision across local authority boundaries exist. This is surprising given the advanced stage of the plan. In addition, the Chamber is very concerned about the lack of any information or insight on the processes of joint working and partnership arrangements. The current NPPF (Dec 2024) strengthens the obligations in relation to Duty to	new joint working strategy that is fully transparent and reflects the status of whatever "on going work" (ref para 5.14) has taken place between the authorities. The updated version of the NPPF (Dec 2024) gives an invitation to the inspectorate at para 28 to take an "informed decision" on this matter.		

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						Cooperate, cross boundary working and joint planning initiatives in relation to strategic planning. It suggests that building economic and climatic resilience depends on partnership working (para 24) and its difficult to argue with that contention. As set out in the introductory sections of this current strategy relies on the previous NPPF but the obligations and key principles remain valid. While the draft plan references an ambition to promote joint working and partnership working (including with the business community), the Chamber can see no real evidence of how these objectives can be achieved or indeed what work related to this policy framework has been done.			
Savills on behalf of Arbury Estates (ID51)	DS2	N	N	N	Y	The emerging Coventry Local Plan (Regulation 19 version) states that 45ha of employment land is required to be exported through Duty to Cooperate. Policy DS2 specifically states that: <i>“The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership will continue to work pro-actively</i>	Suitable evidence should be provided of “constructive, active and ongoing engagement” having taken place between Coventry and its neighbouring authorities. This should be in the form of minutes, actions and agreed	Evidence is considered robust and its application sound. Discussions are ongoing, noting that the local	Some modification to shortfall and supply figures as a result of DtC discussion, update to be

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						<i>with all partners to deliver economic growth and prosperity across Coventry and Warwickshire.”</i> Reference is also made in DS2 to meeting housing need, but crucially no reference is made to employment needs. The Duty to Cooperate Statement states that the total local need figure for Coventry for the period 2021-41 was calculated to be 105 hectares. From this, Coventry has a supply of 60 hectares and a residual need of 45 hectares. Despite repeated Call for Sites, Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it is unable to accommodate a 45 hectare shortfall. It has also made them aware that a Green Belt site (11 hectares developable to the east of the city) is being promoted but that it has been rejected through site assessment. There is no confirmed agreement with other LPAs regarding the provision of the 45ha shortfall Coventry have evidenced (see paragraph 5.19 of the Regulation 19 plan), being exported to other LPA	outcomes of meetings referenced in the DtC statement. This is required to ensure legal compliance with Section 110 of the Localism Act (2011), compliance with paragraph 26 of the NPPF, and ultimately soundness against paragraph 36 of the NPPF in respect of the plan being positively prepared, effective and justified. Policy DS2 should specifically state how the employment requirement shortfall will be dealt with, backed up by evidence base, including relevant SoCGs. This is ensure that work is being done to evidence the Council’s	authorities working together under the DtC are at different stages in plan preparation. MoU has been produced and SoCGs are underway, see DtC compliance statement. As a result of ongoing discussion there may be some change to the supply and shortfall figures cited in the plan and an update	provided to the EIP

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						areas. Coventry should therefore be reaching out to those authorities within the Functional Economic Market Area (FEMA), particularly those it shares strong administrative and functional relationships with. In respect of Coventry and Nuneaton & Bedworth (N&B) there is a particularly strong administrative relationship, due to the fact that Coventry shares around 15% of its administrative boundary with Nuneaton & Bedworth, and the key M6 Junction 3 and links to A444 north to the A5 (and onto the A42 / M1), as is shown on the plan (Officer comment – see the full representation). Coventry also shares a strong functional relationship with N&B. This is highlighted by the fact that both authorities sit within the same Travel to Work area, reflected in high levels of commuting from N&B to Coventry. The net outflow of commuters from Nuneaton and Bedworth to the city stands at -6,517, which is 43% of the overall net out commuting experienced in N&B. This shows the strong link	position that the Duty to Cooperate has been met would be suitably justified as per NPPF paragraph 36. There is no evidence in support of the draft plan on whether engagement to date has been constructive and active in an attempt to resolve the strategic matter of unmet employment need and maximise the effectiveness of plan preparation. Therefore, the plan should not be submitted until further evidence is produced in this regard, and a further Regulation 18 consultation is undertaken to ensure that any shortfalls in the availability of duty to cooperate information	will be provided to the EiP.	

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						between Coventry and N&B, in relation to the provision of unmet employment need. There is clear demand for employment land in Nuneaton and Bedworth, with industrial & logistics rents having increased by 49% 2011 - 2021, indicating new supply has struggled historically to keep pace with the strong demand. This is more than double the rate of inflation over the same period. Given how attractive Nuneaton and Bedworth is to occupiers, there should be consideration for how Coventry should take a proactive role in delivering employment land within the sub-region in order to support economic growth and hence sustainable development. As defined by the West Midlands Strategic Employment Sites Study, a strategic employment site is one of 25ha or more. Therefore Coventry should be looking to its partners in the FEMA to provide these sites as it appears they cannot be accommodated within Coventry's boundaries.	can be suitably dealt with before a further Regulation 19 consultation then takes place. This will ensure that the Council has been able to suitably take into account the comments and queries of stakeholders before the plan is submitted.		

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						The HEDNA (2022) utilises modelled figures for employment land based upon gross completions trends for industrial and warehousing uses. This is flawed due to the fact that consideration of completions only tells part of the story and is set within a “policy on” environment where policy constraints, namely Green Belt in the wider HMA limit the ability of employment development to come forward. Past (likely suppressed) demand in the recent past is not an accurate indication of the levels of employment development required going forward. There is therefore a need to consider a requirement for more than just the 45ha quoted by Coventry during Duty to Cooperate discussions. Meetings with Neighbouring LPAs We note that one way Coventry intends to evidence constructive engagement is through the publication of evidence such as MoUs and SoCGs with neighbouring LPAs and DtC partners (See page 12 of DtC Statement).			

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						Reference is made in the DtC statement to a number of meetings having taken place with Duty to Cooperate partners. To evidence that this engagement has been meaningful; the minutes, actions and outcome of these meetings should be made public (albeit redacted where necessary). This would then suitably evidence cooperation. Otherwise it is not clear whether meetings have been useful in satisfying the requirement for constructive, active and ongoing engagement (PPG Paragraph: 029 Reference ID: 61-029-20190315). We ask that Coventry publish detailed minutes, lists of attendees etc. for the meetings referenced in the DtC statement, and furthermore provide a clear indication of the level of engagement that has been taking place with FEMA LPAs. The PPG requires a Statement of Common Ground to be prepared and maintained on an ongoing basis throughout the plan making process. As a minimum it should be published when the area it covers and			

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						the governance arrangements for the cooperation process have been defined, and substantive matters to be addressed have been determined. We would therefore suggest that NBBC engage with Coventry City Council (and other FEMA authorities) and agree a Statement of Common Ground regarding Coventry's expected unmet housing and employment need. This statement can then be updated and refined throughout the plan making process, as required by the PPG. It is disappointing that Coventry have not acted on representations Arbury Estate submitted to the Regulation 18 consultation encouraging active engagement with relevant stakeholders to evidence Duty to Cooperate having been undertaken and outcomes from these discussions. The PPG states that: "As the duty to cooperate relates to the preparation of the plan it cannot be rectified post-submission, so if the Inspector finds that the duty has not been complied with they will recommend that the local plan is not adopted and the			

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						examination will not proceed any further” (PPG Paragraph: 031 Reference ID: 61-031-20190315) The Duty to Cooperate should be a key thread running through plan preparation, and is not something that can be retrospectively corrected. If Duty to Cooperate is not dealt with upfront during the plan preparation process in a clear and transparent manner, there is a danger of this legal requirement not being met, which is potentially fatal for the plan. Summary and Key Points for Coventry to Consider Having reviewed and considered the evidence base made available in relation to the Duty to Cooperate, we assert that the following key points should be taken forward to ensure that the Local Plan review’s position in respect of Duty to Cooperate is legally compliant, and also sound as per paragraph 36 of the NPPF: • Specific engagement should be made with Nuneaton & Bedworth, due to its strong			

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						administrative and functional relationship with Coventry. • MoUs and SoCGs should be drafted and regularly updated now, as recommended by the PPG. • There are no confirmed contributions from neighbouring authorities in relation to unmet employment need. This should be reviewed, particularly in relation to strategic sites, and specific contributions towards Coventry's unmet need confirmed in statements of common ground.			
Thoma s Willan s (ID65)	DS2 paras 3.16- 3.23	Y	Y	N	N	While Policy DS2 highlights Coventry City Council's commitments under the Duty to Cooperate, there is insufficient evidence of clear agreements with neighbouring authorities to meet unmet housing and employment needs. For instance, Coventry's identified shortfall of 45 hectares of employment land (Policy DS1) is not fully addressed through confirmed cross-boundary allocations. Much of this uncertainty is associated with the South Warwickshire Local Plan being at the regulation 18 consultancy ending on March the 7th. Much of this uncertainty related to the South Warwickshire local plan, including greenbelt issues, housing allocation	As the South Warwickshire Local Plan will have completed the regulation 18 consultancy on 7 March 2025, just 4 days after this consultation closes enabling much of this uncertainty can be reduced soon by incorporating the outcome of the South Warwickshire local plan and their inclusion of the West Midlands Strategic Employment Sites Study	Discussions are ongoing, noting that the local authorities working together under the DtC are at different stages in plan preparation. The DtC compliance paper sets out	No change

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						issues, employment issues will shortly be reduced. The South Warwickshire local plan, for instance, has not yet included the West Midlands Strategic Employment Sites Study (WMSESS) 2023/24 having implications for Coventry's employment needs. This introduces serious uncertainty and risks to the plan's soundness which can be soon reduced. Furthermore, the policy lacks specific mechanisms or actions to ensure that Coventry citizens can reliably access affordable housing opportunities within Warwickshire, as referenced in DS2(2).	(WMSESS) 2023/24 prior to adoption of the Coventry Plan. This would greatly enhance the soundness of the whole plan rather than wait for complications of making piecemeal reviews and alterations at later stages, after adoption, such as that suggested in the policy DS1(4). DS1(4) will still be needed for use at later time. Provide detailed documentation of collaborative agreements with neighbouring authorities under the Duty to Cooperate, particularly regarding employment and affordable housing needs. Include specific measures to ensure that cross-boundary	details of the ongoing working across the HMA and FEMA.	

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							housing provision is accessible to Coventry citizens.		
Stoford Developments (ID60)	DS2	N	Y	N	Y	1.1 The policy does not include any reference to how the City Council will work with the neighbouring authorities within its Functional Economic Market Area to support the delivery of the employment needs identified in Policy DS1 – both local and strategic. NPPF para 24-27 is clear on the Duty to Co-operate and for LPAs to address matters in their plans, and the need for such plans to align. This is a significant omission which must be corrected. Reference is made only to how the City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city. 1.2 As set out in the Growth Needs Background Paper (page 18), Coventry cannot meet its local employment needs in full and the strategic employment needs identified for Opportunity Area 7 within the WMSESS. Thus, this is currently under discussion with partners under the Duty to Co-	1. The policy should be amended to reference how the City Council will work with the neighbouring authorities within its Functional Economic Market Area to support the delivery of the employment needs identified in Policy DS1 – both local and strategic. 2. The Duty to Co-operate policy should be clear about how Rugby Borough Council will assist the City Council in meeting its unmet needs. The policy should refer to how much of the need will be met by Rugby and where. A MOU should also be prepared and agreed comprising a statement of intent	Discussions are ongoing, noting that the local authorities working together under the DtC are at different stages in plan preparation. See DtC compliance statement for details.	No change

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						operate to explore where this could best be accommodated. Given that Rugby Borough is at an early stage of plan making it should be able to respond to the requests of Coventry. This may be through the allocation of sites on the edge of Coventry (within Rugby Borough) to meet Coventry's local needs (given the proximity to local residents in Coventry) and these may be between 20 ha and 45ha in total. Also, additional sites will be required within Rugby Borough to provide for meeting strategic needs (which we consider exceed 84ha) across Opportunity Area 7. If Coventry cannot accommodate them, the most sustainable locations within Rugby Borough should be considered next x x DS2 x given these serve the entire Opportunity Area 7 whereby proximity to Coventry's boundary is less relevant. Sustainable locations, with strong linkages, on brownfield, greenfield, Grey Belt and only where exceptional circumstances exist, should those strategic sites be within the Green Belt of Opportunity Area 7. This Duty to Co-operate policy should be clear about how this will happen in terms of how much 'need' will be met by Rugby and			

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						where. A MOU should also be prepared and agreed comprising a statement of intent.			
Nexus Planni ng on behalf of CEG Land Promo tion III (CEG) (ID39)	DS2	N	N	N	Y	CEG object to the approach of Policy H1 as it is unsound as set out below and consider that it could only be made sound through the amendments proposed to policy in this representation. CEG are pleased to see that Policy DS2 contains support and recognition for proposed residential development south of the city's administrative boundary. The Duty to Cooperate plays a crucial part of the plan-making process, especially in Coventry where they will need to work with neighbouring authorities meet their housing requirements, particularly affordable housing and family sized accommodation. When plan making, Paragraph 35a of the NPPF (December 2023) states plans should be positively prepared so that that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. In fulfilling its statutory Duty to Cooperate, the Council should readily be willing to work with adjacent authorities to address its unmet housing needs. The safeguarded land at	It is CEG's view that Policy DS2 should be further strengthened to provide a clear commitment to work collaboratively with neighbouring authorities on key areas of strategic growth, such as South Warwickshire regarding land at Westwood Heath. For this reason, it is recommended that to ensure this policy is effective and positively prepared that Policy DS2 should be amended to the following (additions underlined in bold): 1. "Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development	Noted however this site has not been selected for development so it is not appropriate to include here as proposed (in bold test in the respondent's request for a modification).	No change

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						Westwood Heath (Policy DS21 – S1 of the WDLP) and the wider opportunities to the south of this safeguarded land are both sustainably located and would present a significant opportunity to assist with meeting Coventry's unmet housing need.	needs identified in Policy DS1 that originate from the city. 2. In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met. 3. The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an ongoing basis		

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							across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment. 4. Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, Supplementary Planning Documents (SPD) and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary. 5. Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-		

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							going basis with all relevant partners to enable the delivery of new development on these sites. 6. Of particular relevance to parts 4 and 5 of this policy is the continued support for and recognition of the contribution which the following sites make to the sub-regional economy: a. Jaguar Land Rover at Whitley; b. The University of Warwick; c. The wider Coventry Gateway proposals; d. Ansty Park; e. Pro-Logis Park at Keresley; and f. Proposed residential developments to the south of the city's administrative boundary, including: Land at Westwood Heath within Warwick District Council's administrative boundary. 7. The Council is		

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							committed to supporting the economic growth objectives of the subregion and, in partnership will continue to work pro-actively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire.” CEG are pleased to see that a Duty to Cooperate Statement has been published. However, in order to comply with the Duty to Cooperate, the Council needs to demonstrate that it has, and remains, in proactive engagement with other local authorities within the sub-region around the issue of the housing and employment requirements. CEG are aware, for example, that the examination of the Shropshire Local Plan has		

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							faced significant delays and is likely to be either withdrawn or found unsound due to, amongst other matters, a lack of clarity and information on the cross-boundary cooperation with neighbouring authorities. In this regard, it is considered that further information, such as Statements of Common Ground, which demonstrate engagement between the plan-making Council and neighbouring authorities should be made available ahead of the plan's submission for examination. The scale of the changes proposed by the Local Plan Review such as departing from the standard method and opting not to apply the urban uplift is likely		

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							to have significant knock-on effects for plan-making within neighbouring authorities. The issue of potential unmet need requires clearly evidenced and ongoing cooperation. Ongoing work will still be needed as the Plan progresses including as part of the Examination in Public. Notwithstanding this, the Plan makes no mention of an update to the Memorandum of Understanding 1 which needs to be carried out given it relates to the planned distribution of housing within the Coventry & Warwickshire Housing Market Area and updated in light of emerging local plans throughout the sub-region.		

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Oxalis on behalf of Hallam Land (ID46)	DS2 Parts 1 and 7	N	N	N	Y	Policy DS2 sets out the Council's approach to the 'Duty to Cooperate'. In particular, Part 1 states that: "Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city." And Part 7 states that: "The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership will continue to work pro-actively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire." As discussed in our response to Policy DS1 within form 2, the approach to delivering development needs is unsound as there is no certain approach to delivering the entirety of the recognised employment land requirements/shortfall. In turn, Policy DS2 Part 1 would not result in the entirety of the employment land requirements being met and is therefore unsound.	Policy DS2 should be backed by a Statement of Common Ground or Memorandum of Understanding to ensure that Duty to Cooperate partners will meet the identified employment land shortfall in Coventry or allocated sufficient sites to meet this need.	Discussions are ongoing, noting that the local authorities working together under the DtC are at different stages in plan preparation. See DtC compliance statement.	No change

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						Part 7 of Policy DS2 relates to Duty to Cooperate partners helping to meet the identified employment land shortfall. This is not reinforced by a Memorandum of understanding, or Statement of Common ground that is publicly available, and therefore this policy does not commit to ensuring that the identified employment land shortfall will be met. Policy DS2 can therefore not be considered sound in conjunction with Policy DS1. Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025. Officer comment: See complete representation for further information			
CPRE (ID12)					Y	Policy DS2(1) states: Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.	Policy DS2 should be amended to state that Coventry City Council will work with neighbouring authorities within its Housing Market Area to provide for	The council considers its evidence to be robust and associated	No change

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						There is a surplus of supply of housing land in the City. Table 6.1 <i>Components of Housing Supply 2021-2041</i> states that supply is 31,493. This is a surplus of 3,730 against the Housing Need that the NSM projects for Coventry (27,760). If the HEDNA housing need projection is used, there is also a surplus, of 2,850. Para 6.10 of the Plan states 6.10 The HEDNA identifies a local housing need of 1,455 per annum over the plan period, 29,100 in total. Following a thorough consideration of sustainable development principles and in accordance with the NPPF, an assessment of land options through the Call for Sites and the HELAA and a density study informing a strategy of increased densification a capacity of around 31,954 homes has been identified, which provides a degree of flexibility above the local need figure of 29,100." Detailed assessment for Keep Our Green Belt Green (KOGG) shows that supply is significantly underestimated. Densities are likely to be higher,	some of the housing needs of those authorities where they have a requirement higher than their land supply while Coventry has housing land supply in excess of the requirement set by both the HEDNA and the Dec 2024 NSM.	strategy to be sound.	

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						windfalls are underestimated by 50%, and the supply of student accommodation (PBSA) is underestimated. The windfall allowance in Table 6.1 should be adjusted from 2,800 to 5,600 and windfall from PBSA development of 1,400 should be added. The total supply should be given as 35,693 in the Plan Period (2021-2041). Coventry's Local Plan has a potential surplus of 7,933 homes. The Plan will have capacity for 35,693 homes and a need under the NSM of 27,760. Some sites in the Plan which are damaging and do not have any planning permission should be de-allocated, in Keresley Parish (Proposal H2.1 Keresley SUE). This could reduce the surplus by @1,000. The Warwickshire Districts have a housing requirement which is above their supply (notably the South Warwickshire Plan, and Rugby). Coventry can provide for some of the housing numbers specified for them in the NSM. Policy DS2 should be amended to state that Coventry City Council will work with neighbouring authorities within its Housing Market Area to provide for some of the housing needs of those			

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						authorities where they have a requirement higher than their land supply while Coventry has housing land supply in excess of the requirement set by both the HEDNA and the Dec 2024 NSM. The report 'Coventry Plan: Housing' (February 2025) by Gerald Kells is attached.			
Tetlow King Planning on behalf of the West Midlands Housing Association Planning	DS2	N	N	N	N	<u>Policy DS2: The Duty to Co-operate and partnership working</u> The WMHAPC welcomes the Council's plans to work in collaboration with neighbouring authorities to ensure affordable housing needs are met, sharing responsibilities amongst the authorities within Warwickshire. The NPPF requires local authorities to maintain effective cooperation, setting out at paragraph 24 that <i>"Local planning authorities and county councils (in two-tier areas) continue to be under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries."</i>	Respondent comment: 'Refer to previous representation response'.	Noted	No change

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Consortium (ID63)									
Turley on behalf of the University of Warwick (ID68)	DS2	Y	Y	Y		DS2 Policy DS2 sets the Council's commitment to working with partners on preparing joint documents, including Supplementary Planning Documents, to help deliver new sustainable development which straddles or adjoins the city's administrative boundary. Part 6 of Policy DS2 refers to and gives support and recognition of the contributions that the University of Warwick makes to the sub regional economy. The University has worked collaboratively with the City Council and Warwick District Council over the last 12 months to prepare a Supplementary Planning Document for the campus which was adopted by both authorities in December 2024. The SPD reflects the University's Capital Plan for future investment in the campus up to 2033. The support that Policy DS2 gives to the University and the collaborative working which has resulted in	N/A	Noted	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						the adoption on the SPD for the campus is supported and welcomed.			
RPS on behalf of St Modwen Homes (ID48)	DS2	N		N	Y	RPS welcomes the Councils' stated commitment (in criteria 1) to working across the housing market area to support the delivery of the development needs that originate from the City. <u>Housing need matters</u> Nonetheless, as we have explained in our response to Policy DS1, the housing requirement is over 10,000 more than suggested under the December 2023 standard method (when applied correctly), resulting in a notional shortfall of 7,787 number of dwellings emanating from the City. This unmet need must be re-distributed to neighbouring areas, primarily to neighbouring authorities within the Coventry & Warwickshire Housing Market Area. In doing so, this will ensure CCC accords with national policy on joint working to determine whether development needs that cannot be met wholly within a particular plan area, in this case in Coventry, could be met elsewhere (NPPF 2023, para 26).	Work with its neighbours to identify a suitable mechanism for re-distributing the unmet need from the City under the December 2023 standard method (7,787 dwellings) ideally through a revised Memorandum of Understanding (MOU) signed between the C&W HMA authorities. Amend criteria 2 as follows (additional text): <i>"In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities and housing providers (private and public)</i>	Discussions are ongoing, noting that the local authorities working together under the DtC are at different stages in plan preparation. See DtC compliance statement. The evidence base is considered to be robust and the approach to its use in informing the	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						However, it is very clear that CCC has no intention to work 'actively, constructively, and on an ongoing basis' or work jointly with its neighbours (in accordance with Duty under the Localism Act) in respect to addressing future housing need in the City. This is largely due to the artificial suppression of the stated housing requirement in Policy DS1 (and Policy H1), which includes the unjustified exclusion of the urban centres uplift applicable to Coventry under the December 2023 standard method set out in Planning Practice Guidance (PPG). This has resulted in a lower housing requirement and, consequently, wiping out any apparent unmet need for housing coming from the City (a completely different scenario to the current, adopted strategy). Taken together, the approach to defining the housing requirement does not constitute an effective and justified strategy and so is not soundly-based. Furthermore, due to a unilateral decision to suppress the housing figure, this also arguably does not comply with the Duty to Cooperate obligations	<i>to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met, <u>including mixed-tenure housing development.</u>"</i>	review is considered to be sound.	

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Regulation 19: Summary of Representations

Respo ndent / organi sation / agent	Secti on	Com plies with Duty to Coop erate Y/N	Legal ly Com plian t? Y/N	Sound Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						that requires constructive engagement to address strategic matters under the Localism Act. <u>Meeting the affordable housing needs of the City</u> Furthermore, criteria 2 of the policy states that: <i>“In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city’s wider housing needs being met”</i> RPS acknowledges the approach to addressing the need for affordable housing emanating from the City, including working with neighbouring authorities to help deliver this outside the City. However, meeting affordable need should not be considered as separate to addressing the wider housing needs of Coventry, which includes market housing. This is because the vast majority of new affordable homes delivered as part of mixed-tenure housing schemes involve joint partnerships between			

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						private house builders and registered providers, irrespective of location. It is unclear how this policy will be delivered without the market-led schemes coming forward and, as currently drafted, the policy is not effective and so not soundly-based.			
Home Builders Federation (ID21)	DS2	N	N	N	Y	STRATEGIC POLICY, Policy DS2: The Duty to Co-operate and partnership working <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 41. Although HBF welcome the Councils' stated commitment to working across the housing market area and helping to ensure any unmet needs of Coventry are addressed elsewhere, such statements are undermined by the artificial suppression of the housing figures. We are unclear as to the need and justification for these commitments to be a policy in the Plan, as they are really a statement of intent. We welcome the	Please refer to representation	Noted. The council considers its evidence to be robust and its approach to be sound	No change

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						Council's commitment to supporting economic growth but as we have suggested elsewhere within our representations, the Plan should be enabling more housing to support that growth.			
Stantec on behalf of SEGRO (ID58)	DS2	N		N	Y	POLICY DS2: THE DUTY TO CO-OPERATE AND PARTNERSHIP WORKING 7.1 Policy DS2 confirms that Coventry City Council will work with neighbouring authorities in its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the City. Policy DS2 specifically refers to supporting the growth and expansion of a number of sites near to the boundary of Coventry City including Ansty Park, which is adjacent to SEGRO's proposed Walsgrave employment site shown at Appendix B. 7.2 Policy DS2 reflects the Council's commitment to co-operate with partners on a range of matters including housing, infrastructure, economy and jobs, transport, health and the environment. SEGRO welcomes this objective in the Policy.		Noted. Discussions are ongoing, noting that the local authorities working together under the DtC are at different stages in plan preparation. See DtC compliance statement.	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						7.1 SEGRO also welcome the Council's commitment to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development sites that cross and are adjacent to administrative boundaries. 7.2 The previous Local Plan Inspector's Report into the now adopted Coventry City Council Local Plan, referred to the demand for new employment land around Coventry and Warwickshire (paragraph 178). The Inspector referred to the City Council's support for its 'Warwickshire neighbours' intention to allocate additional sites adjacent to the boundary of Coventry City within the wider Green Belt. 7.3 SEGRO welcomes the overarching objective of Policy DS2 to commit to cooperate with partners on a range of matters including economic growth, infrastructure and others. We note many of the sites identified in part 6 of Policy DS2, such as Ansty Park, which are intended to meet Coventry's unmet need, in neighbouring authorities are now substantially built out. Therefore,			

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						new sites will need to be identified to meet the unmet need arising from Coventry City and over the new Plan period. 7.4 It is clear that the previous Local Plan Inspector's view referred to (above) and the objective of Policy DS2 to support the delivery of sites in neighbouring authorities to meet Coventry's unmet need, provides a context for the delivery of future sites, adjacent and well placed to meet Coventry City's unmet need. 7.5 The proposed employment site at Walsgrave provides the opportunity to make a significant contribution to unmet employment need, including 'strategic B8', arising from Coventry City. The Site is in a location adjacent to Coventry's boundary, well placed to support the economy of Coventry City, with excellent links to the strategic road network; which itself is proposed to be improved by National Highways. 7.6 SEGRO recognise that Coventry City are in discussions with its neighbours to deliver the unmet local and strategic B8 employment need and therefore express that the Council are undertaking the work			

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						with their neighbours to identify suitable sites to meet this unmet need. 7.7 For Policy DS2 to be considered to 'positively prepared' and 'consistent with national policy' in accordance with paragraph 35 of the NPPF, the Policy should specify that the Council's preference is to identify sites to meet the unmet need by Coventry's neighbours in locations closest to where the need arises. This would contribute towards meeting the objectives in the NPPF of achieving sustainable development by placing and ensuring sufficient land of the right type is available in the right places and placing employment growth adjacent to new planned homes. Officer comment: See full representation for more details			
Stride Treglown on behalf of Coventry	3.16	Y	Y	Y	Y	References in the Local Plan to the Duty to Co-operate should explicitly include the varied interests of the University Group. The University Group operates within the confines of Coventry City Council and has a presence at Ryton Gardens in the neighbouring Rugby Borough Council. The University Group's Estate Strategy captures estate optimisation	No modifications are sought. This representation is made in the interests of supporting a positive, justified and effective plan.	Noted	No change

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University (ID61)						and decarbonisation and could result in cross-boundary opportunities linked to renewable energy generation, job generation and carbon offsetting. The wider benefits arising from cross-boundary proposals should be accepted and encouraged within the Local Plan, alongside the opportunities for three-way discussions between the University Group and the two Councils where this would be beneficial to the interests of all parties.			
Stantec on behalf of Catesby Estates (ID56)	DS2	N		N	Y	4.3 Policy DS2: The Duty to Co-operate and Partnership Working 4.3.1 The Duty to Co-operate (DtC) is a legal test that requires co-operation between local planning authorities and other public bodies to maximise effectiveness of policies for strategic matters in Local Plans. The Proposed Submission Local Plan suggests that further details in respect of the DtC are set out in the Duty to Co-operate Paper (which is considered below). Local Plan Review Duty to Co-operate Statement – Regulation 19 Proposed Submission Stage	Required Changes 4.3.19 A failure to meet the DtC cannot be rectified and constitutes a failing of the Proposed Submission Local Plan. The Plan is therefore not sound. 4.3.20 Notwithstanding, should the Inspectors determine otherwise, land to the south of Coventry within the City boundary, including Land at Gibbet Hill Road,	Discussions are ongoing in line with the DtC, noting that the local authorities working together under the DtC are at different stages in plan preparation. See DtC compliance statement. The	No change

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						4.3.2 As described earlier within this representation, Paragraph 27 of the NPPF requires strategic policy-making authorities to prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning practice guidance, <u>and be made publicly available throughout the plan-making process to provide transparency.</u> 4.3.3 Put simply, the Council has not done this; there are no statements of common ground available as part of the Proposed Submission Plan evidence base. 4.3.4 In this regard, the Duty to Co-operate Statement states: <i>"This Duty to Co-operate paper sets out how the Duty is actively being applied in relation to the development of the Coventry Local Plan Review, and will be updated post Regulation 19 as Statements of Common Ground are prepared."</i>	should be safeguarded as a minimum to come forward at such a time when the SWLP progresses to adoption, should it continue to allocate land within Strategic Growth Area SG01 for development.	evidence base is considered robust and the approach to the plan review informed by the evidence is considered sound.	

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						4.3.5 The Council has accordingly failed to meet the duty in respect of preparing and making statements of common ground publicly available. 4.3.6 Furthermore, whilst the Council has produced a Duty to Co-operate Statement which describes a number of strategic issues relevant to Coventry and Warwickshire, it provides nothing in terms of what has been discussed or agreed with stakeholders in relation to any of these matters. Instead, the Statement describes only how a very limited number of the identified stakeholders responded to the Issues and Options consultation undertaken by the Council. 4.3.7 Regarding overall levels of housing growth, the Statement sets out that: <i>“Through Issues and Options and subsequent discussions at CSWAPO [Coventry, Solihull and Warwickshire Association of Planning Officers], Coventry has always been clear that it would be proceeding with a housing need number from the HEDNA which reflected local need but did not include the 35% Cities Uplift (a figure set</i>			

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						<i>by the previous Government as part of the Standard Method). Through CSWAPO discussion Coventry has always been clear that it did not expect any partners to deliver the cities uplift either as it would be arguing against this through the Local Plan process."</i> 4.3.8 This does not indicate any level of cooperation or indeed agreement from any members of the CSWAPO. It strongly indicates that Coventry City Council has simply determined its own approach to housing growth and afforded others the opportunity to agree with them. Policy DS2: The Duty to Co-operate and Partnership Working 4.3.9 Policy DS2 describes a number of ways in which Coventry City Council will approach the DtC, including how it intends to work with neighbouring authorities within its Housing Market Area. 4.3.10 Part 5 of the Policy states: <i>"Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an</i>			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						<i>on-going basis with all relevant partners to enable the delivery of new development on these sites."</i> 4.3.11 Part 6f then goes on to clarify that this includes proposed residential developments to the south of the city's administrative boundary. 4.3.12 Whilst this is supported by Catesby Estates, it is submitted that the Plan does little in reality to support any proposed development to the south of the City boundary. 4.3.13 In this regard, Policy GB2 (Safeguarded Land in the Green Belt) identifies four areas of land which were removed from the Green Belt and safeguarded for long term development in the 2017 Coventry Local Plan. 4.3.14 In respect of this site, the Proposed Submission Plan states: <i>"At the time of writing, proposals are being considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by</i>			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						<i>Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update."</i> 4.3.15 The above statement is concerning in that a Regulation 18 (Part 2) version of the SWLP is currently undergoing consultation concurrently with the Coventry Local Plan (the SWLP consultation closes four days later on 7th March). The consultation version of the SWLP includes a number of 'Strategic Growth Locations' which represent potential locations for development within the final SWLP. The Strategic Growth Locations include SG01 'South of Coventry which, as the name suggests, is located around the southern edge of the Coventry City boundary (see SWLP map extract below – Officer comment: please refer to full representation for this, appendices and further information)			

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						4.3.16 Whilst Land at Gibbet Hill does not fall within the land safeguarded by Policy GB2, the fact that Coventry City Council appear to be unaware of the SWLP consultation or the content therein heavily suggests that the two authorities are not engaging with or co-operating with one another, which represents a failing of the DtC and therefore the Plan. Soundness 4.3.17 It is therefore evident from the above that the Council has failed the DtC. It has not engaged with relevant stakeholders in any meaningful way (particularly neighbouring planning authorities) and has failed to produce and maintain publicly available statements of common ground as required by the NPPF. 4.3.18 The Local Plan Review is therefore not effective.			
Coventry and Warwick	DS2				Y	The sentiments set out in this policy framework are welcomed. We note the commitment of the City to	Unless the Council alters or supplements its position before deposit of the Plan, the	Work under the DtC has been substantial and	No change

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ckshire Growth Hub (ID9)						partnership working but see little evidence to substantiate this draft policy as set out. The lack of detailed information related to the Duty to Cooperate makes it difficult, if not impossible, to judge how this statutory obligation is being discharged in relation to Coventry and its sub regional neighbours. For this reason, the Growth Hub considers that the draft policy is not sound. The draft policy DS2 relies heavily on the assumption that Coventry's unmet employment provision in relation to both strategic (large scale) and local employment provision will be located and accommodated in surrounding local authorities. However, having consulted several of the surrounding partner local authorities it appears that that no formal agreements or related arrangements to make provision across local authority boundaries exist. The current NPPF (Dec 2024) strengthens the obligations in relation to Duty to Cooperate, cross boundary working and joint planning initiatives in relation to strategic planning. It suggests that	Council should be directed to prepare a new joint working strategy that is transparent and reflects the status of whatever "on going work" (ref para 5.14) has taken place between the authorities. The updated version of the NPPF (Dec 2024) gives an invitation to the inspectorate at para 28 to take an "informed decision" on this matter in the event the Council does not flesh out the draft policy with more detail.	is ongoing. See DtC compliance Statement.	

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Respo ndent / organi sation / agent	Secti on	Com plies with Duty to Coop erate Y/N	Legal ly Com plian t? Y/N	Sound Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						building economic resilience depends on partnership working (para 24). While the draft plan references an ambition to promote joint working and partnership working (including with the business community) the Growth Hub can see no evidence of how these objectives can be achieved or indeed what partnership work related to this policy framework has been jointly undertaken?			

Policy DS3 - Sustainable Development Policy

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Mining Remediation Authority (ID34)	DS3	Y	Y	N	Y	Our records indicate that within the Coventry City Council area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. The recorded coal mining features appear to be concentrated in the eastern side of the City Council area and include a significant amount of mine entries in the vicinity of Woodway Park, Henley Green and Binley. It is noted that the Development Risk Data Plans we provide annually to show areas of high risk were downloaded by the LPA on the 12th August 2024. I therefore assume that the LPA are aware of those areas in the authority where recorded coal mining features are present.	We consider that our concerns could be addressed, and the soundness of the plan supported, by adding an additional criteria to Policy DS3: Sustainable Development Policy as criteria j, please see below suggested policy wording. Policy DS3: Sustainable Development Policy When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development	This could be added in as an additional modification (potentially might fit better under the Environmental Management (EM) Policies)	Potential modification to include the proposed additional point j.

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respo ndent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						We hold no treatment details for the majority of the recorded mine entries within the area and they therefore pose an increased risk to public safety and surface stability. Any new development in areas where our records indicate that past coal mining activity has taken place is potentially at risk. This is why new development in the Development High Risk Area (DHRA) should be supported by a Coal Mining Risk Assessment and any risks identified by this assessment addressed by the undertaking of any remedial works or mitigation measures necessary. Coal mining legacy poses a risk to new development proposals in those parts of the City Council area where features are recorded to be present. We do not consider it to be unreasonable to request the inclusion of a policy which sets out requirements in respect of ground conditions when new development is	contained in the National Planning Policy Framework (NPPF). It will work proactively with applicants to find solutions to enable proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, taking into account the ambitions of the One Coventry Plan and the Climate Change Strategy and including: access to a variety of high quality green and blue infrastructure; a. access to a variety of high quality green and blue infrastructure b. access to job opportunities		

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						proposed, as the plan appears to be silent on this matter. Paragraph 187 of the NPPF states that planning policies should contribute to and enhance the local environment by preventing new development from being put at unacceptable risk from land instability. Paragraph 196 also notes that planning policies should ensure that sites are suitable for their proposed use taking into account risks arising from land instability.....including risks from former activities such as mining. Although we appreciate that risks posed by coal mining legacy do not cover the whole of the authority area, where they are present they do pose a risk if not properly considered. The presence of mine entries on a site can also impact on the quantum of development that can be accommodated due to the need to avoid building over or close to these features.	c. use of low carbon, renewable and energy efficient technologies d. the creation of mixed sustainable communities through a variety of dwelling types, sizes, tenures and range of community facilities e. increased health, wellbeing and quality of life; f. measures to adapt to the impacts of climate change; g. access to sustainable modes of transport; h. preservation and enhancement of the historic environment; and i. sustainable waste management; j. measures to address risks posed by ground instability.		

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							This would ensure that for those parts of the Coventry City area where land instability is a potential risk developers will be aware that the issue need to be addressed, preventing any undue delay in the decision making process		
Keith White head (ID25)				N	Y	Details of why the Local Plan Review is not sound From the Local Plan Review referencing DS3 there is the following chart [officer comment: see full representation]. The priority is named as “Tackling the causes and consequences of climate change”. In 2017 when the Council’s Cabinet approved looking at Very Light Rail, it was a “Low Emission Development” that could tackle the causes of climate change. At the time this was promoted as “decarbonising public transport”.	Modifications considered necessary to make the Local Plan Review sound The suggestion to make the Local Plan Review sound is to remove all references to Very Light Rail as it is not viable for Coventry. No funding for routes has not been provided and attempts to fund a route to the Hospital failed and attempts to fund the route to the Ansty Park rely on the	The plan wording is considered appropriate	No change

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						Unfortunately events have overtaken this project and Coventry is already well on the way to decarbonising public transport by becoming the first electric bus City in the UK this year. Hence Coventry has tackled the causes and consequences of climate change for public transport in the City. The timescale for the first route to the hospital was meant it would be operational in 2025. That route has been dropped and there is no current funding approved for a Very Light Rail route in Coventry. Very Light Rail in Coventry has no current merit and should not be in the Local Plan. With the electric buses, Coventry's public transport system is close to being balanced in favour of sustainable transport mode. Paragraph 12.47 in the Local Plan and also included in Policy AC5 says <i>Major trip generators such as the city centre, Ansty Park, Whitley Business Park, the Universities and the</i>	route to the Hospital being built.		

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						<i>Hospital will be a priority for the provision of high quality rapid transit services. Routes will also serve Coventry main railway station and other transport interchanges to enable close integration</i> This paragraph is inaccurate. "Major trip generators such as the city centre, Ansty Park, Whitley Business Park, the Universities and the Hospital will be a priority". The Local Democracy Reporting Service was told in January 2025 the Council stated that an alternative to Ansty Park and the Hospital "makes far more sense." Hence clearly saying that Ansty Park and the Hospital are not priorities. Hence claiming that they will be a priority in the Local Plan is not credible. <i>12.46 The Council's preferred way to deliver rapid transit is the Very Light Rail system and development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to</i>			

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						<i>make provision for those routes including new infrastructure to facilitate the integration of the rapid transit network into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.</i> <i>“The Council’s preferred way to deliver rapid transit is the Very Light Rail System” to Ansty Park and the Hospital is inaccurate as plans have shifted to looking for funding for the new priority route that will go to the investment zone via a southeast loop route through Whitley.</i>			
Tyler Parkes on behalf of PCCWM (ID69)	DS3	Y	Y	N	Y	In relation to Policy DS3, the PCCWM made the following representation to the Regulation 18 consultation: “The PCCWM therefore supports the updating of the policy and specifically to refer to the priorities of crime reduction and reduction in the fear of crime, as referenced in the One Coventry Plan.”	The PCCWM requests the addition of further sub-paragraphs to Policy DS3 making reference to “the creation of secure and safe living environments” and “measures to reduce crime and reduction in the fear of	These matters are covered already elsewhere in the plan	No change

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Regulation 19: Summary of Representations

Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respo ndent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						However, the Consultation Statement does not acknowledge this representation. Although it is acknowledged that it is not necessarily an inclusive list of how the policy will measure the achievement of sustainable development, nevertheless it omits any reference to reducing crime or the fear of crime which is considered to be a key requirement towards the achievement of sustainable development. The PCCWM therefore OBJECTS to the omission and requests the addition of further sub-paragraphs to Policy DS3 making reference to “the creation of secure and safe living environments” and “measures to reduce crime and reduction in the fear of crime”.	crime”.		
Stephe n McNa ught (ID59)	DS3		N	N	Y	Policy DS4 (part C) has not been replicated in DS3. In DS3 reference is made to parts b and d relating to three areas including Keresley. However, there is no part c for Keresley. Please see additional submissions.	Please see additional submissions.	Noted that this was omitted in error and an erratum statement has been issued. The Guidance	Proposed modification to the reviewed plan, which reinstates Policy DS (part c) but with a

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								Note which accompanied the plan cited a minor change to DS4c, 'Change proposed to part 2. Ensure that the planned Local Centre is in accordance with Policy R1', with the explanation: 'This policy is considered to remain up to date. Only change is an updated position on the	minor word change to part 2: 'Ensure that the planned Local Centre is in accordance with Policy R1'

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								Northern Local Centre which is no longer proposed as part of the allocation, as it was removed via Planning approval OUT/2019/048	

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Home Builde rs Federa tion (ID21)	DS3	N	N	N	Y	STRATEGIC POLICY, Policy DS3: Sustainable Development Policy <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 42. Although HBF is very supportive of Local Plan that begin with a clear policy setting out how a planning application would be determined, this policy need expanding to reference the role of the tilted balance and more clearly set out the importance of housing monitoring and delivery, and the implications the lack of housing supply would have on decision-making. It is important for all plan-users, but particularly local communities that there is a need to embrace new development and help shape it, rather than resist the principle, and there are consequences if Councils	Respondent comment: 'Please refer to representation'.	It is not considered necessary to go into the level of detail proposed as this is set out in national policy	No change

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						do not permit enough housing applications.			
KOGG/ Merle Gering (ID32)	DS3	N		N	Y	Not deliverable – not sound DS3 section 3		The council considers its approach to be sound and	No change

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						3. Overall Levels of Growth and the Duty to Cooperate Policy DS1 b,c,and d - all call for review if there is new evidence There is clearly new evidence – the complete failure of SNPP2014, and the lack of any of the exceptional circumstances which the 2017 inspector relied upon, and new government policy, the New Standard method, all demand a fresh evaluation of overall housing need. New Evidence Even if the New standard Method is adopted, the numbers do not stack up. It will be nearly impossible to deliver 1366 homes per year. In the last 10 years PBSA has made up nearly half of all completions, (which have totalled 1259/yr for dwellings of all kinds)		based on robust evidence	

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						Since 2014, approx 14,700 pbsa beds have been added to market – see the Council PBSA study, Purpose_Built_Student_Accommodation_Market_Study_2024. At 2.5 beds/dwelling this has accounted for 5880 completions [conversion ratio of 2.5 beds/completion comes from the Housing delivery test and Coventry AMR]. Therefore in this 10 year period, the market has only delivered 671 dwellings/year for the family/non student residential market. Even at this much lower delivery rate, builders have struggled to sell their homes. In Keresley, Taylor Wimpey have reduced their starter price from £375,000 at opening, to £275,000 currently, with lots of sweeteners. Even accepting the New Standard Method, the			

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						homes are not deliverable in the current market. The government may wish for 1366 homes/year, but you cannot defy the laws of gravity. The market will not deliver 1366 homes/year in Coventry. Only a massive government intervention, which no one envisages, could do this. As student numbers are declining, and landlords have been struggling to fill pbsa – see the local press – they are applying to allow non students to use them – there is no reason to think that the bonanza of pbsa construction will continue. Numbers, which can be counted on, are the normal residential market, much lower than the Hedna or even the NSM. Officer comment: See representation submission for fig 4.2 Further reasons why land at Keresley should be de-allocated as supported by local plan policy –			

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						Officer comment: see representation for detailed reasons outlined in their box matrix. For all of these policy reasons, - and because the exceptional circumstances – the vast population growth cited by the 2017 inspector - have turned out to be entirely spurious, remaining undeveloped land without planning permission at Keresley should be returned to green belt, as the land still fulfils the purposes of green belt despite having been removed. – as argued by S McNaught. Officer comment: See representation for detailed associated appendices.			
Stantec on behalf of HGIT Central	DS3			N	Y	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.		Noted however this is covered in the Jobs and Economy section	No change

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Coventry Ltd (ID57)									

Policy DS4 - Masterplan principles

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined Authority (ID67)	DS4 (Part A)	Y	Y	Y	N	N/A	Policy DS4a states that cycle parking should align with the Local Plan's parking requirements. Does this account for potential future increases in cycling demand due to investment in cycling infrastructure?	Policy DS4a remains unchanged (except for a minor amendment to remove reference to the AAP) however the accessibility (AC) policies are updated to reflect the most recent transport strategy and	No change

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								increased modal shift.	
Framptons on behalf of Windmill Village Hotel and Golf Club Ltd (ID16)	DS4 (Part D)	Y	Y	Y	N	My client supports the continued allocation of the Easten Green SUE. My client has obtained planning permission on the Windmill Green site which forms part of the SUE (application ref: OUT/2020/2009). Developments will commence in 2026.	N/A	Noted	No change
Whitley Residents & Neighbourhood Watch	DS4			N	Y	Strategic Policy DS4 (Part A) – General Masterplan Principles ix Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1) ... If a proposal is a strategic land allocation for development (as stated in Policy GE2), it is unlikely that Strategic Policy DS4 (Part A) ix will be able to	Strategic Policy DS4 (Part A) – General Masterplan Principles ix Proposals should respond to the local context and local design characteristics (in	Noted however the policy wording is considered appropriate as issues raised are more	No change

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Association Focus Group (ID74)						accord with Policy GE3 (1), that might protect the local context and local design characteristics, as sites mentioned in Policy GE3 (1) could also be considered green space, particularly informal green space, as categorised in the adopted Coventry City Council Green Space Strategy(2019-2024) Strategic Policy DS4 (Part B) Whitley Specific Masterplan Principles, vii - An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road, but does not specify the size or extent of the buffer, which could be open to interpretation, and therefore lacks clarity. Strategic Policy DS4 (Part B) Whitley Specific Masterplan Principles ix – Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2. Policy GE2 Green Space (3) has allocated two sites to support the provision of new sports pitches for	accordance with Policies GE3, HE2 and DE1) ... Policy GE3 1. Sites of Special Scientific Interest (SSSI's), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. This statement lack clarity and certainty on how such sites will be protected from development, if such sites are included in a strategic land allocation for development as stated in Policy GE2. Therefore there is uncertainty on how proposals would be able to	pertinent to the detail which would be considered through a planning application	

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						the proposed allocations at Policy H2:19 and Policy JE2:4. This would make provision for King Henry VIII sports fields, but does not appear to make provision for Baginton Playing Fields. Yet Baginton Playing Fields is an important recreational amenity for the local community and valued publicly accessible green space that is within walking distance of local residents, supporting active living. Baginton Playing Fields also provides important connectivity between Whitley Grove Woods and Baginton Fields Local Nature Reserve.	respond to the local context and local design characteristic as stated in Strategic Policy DS4 (Part A) ix. Strategic Policy DS4 (Part B) Whitley Specific Masterplan Principles, vii – An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road Details of the size of the buffer should be given. Strategic Policy DS4 (Part B) Whitley Specific		

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							Masterplan Principles ix – Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2. Specify what provision is to be made for Baginton Fields Playing Fields.		
Coventry and Warwickshire Chamber of Commerce (ID8)	DS4	No response	Y	N	Y and N	The stated ambition in Policy DS3 and the accompanying clauses in paras i-xiv are generally welcomed in relation to major development proposals. In terms of the large employment and mixed uses schemes that are required to undertake Master Plans there should be a careful and explicit evaluation of additional costs that might be imposed through any master plan requirements. It is not clear why the major strategic employment site at Baginton Fields has been omitted from the	(i)The policy should be modified to add in an explicit requirement to undertake a cost impact analysis based around the imposition of Master Plan provisions. This is to avoid excessive imposition of additional costs on employment proposals and provide an insight into	This was a policy approach which has been found sound through the previous adopted local plan process and to introduce such change at this	No change

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						requirements of this process. This large site has many different features and would seem to require sensitive master planning and an approach where effective consultation is carried out incorporating a significant input from a range of partners.	further abnormal costs that may occur. (ii) Bagington Fields should be added to the list of key employment sites requiring overall Master planning.	point through a plan review would seem disproportionate.	
Lucy White Planning Limited on behalf of National Grid Electricity Distribution	DS4 :A	Y	Y	N	N	Policy DS4 (Part A) General Masterplan Principles NGED supports the policy requirement for all proposals to be planned in a comprehensive and integrated manner with partnership working with relevant stakeholders. Criteria xiii of the policy should not only require appropriate provision of new utility infrastructure, but also ensure existing utility infrastructure is safeguarded and retained in situ to maintain utility provision.		Noted however a blanket requirement for retention in situ would remove any flexibility at the planning application stage and such matters would be for the detail of the application and for the	No change

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(South West) Plc (ID26)								developer to address	
Keith Whitehead (ID25)	DS4			N	Y	Details of why the Local Plan Review is not sound Paragraph 12.47 in the Local Plan and also included in Policy AC5 says <i>Major trip generators such as the city centre, Ansty Park, Whitley Business Park, the Universities and the Hospital will be a priority for the provision of high quality rapid transit services. Routes will also serve Coventry main railway station and other transport interchanges to enable close integration</i> 12.46 <i>The Council's preferred way to deliver rapid transit is the Very Light Rail system and development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to make provision for those routes including new infrastructure to facilitate the integration of the rapid transit network into the development site.</i>	Modifications considered necessary to make the Local Plan Review sound The suggestion to make the Local Plan Review sound is to be accurate about the new priority route that may go to the investment zone via a south-east loop route through Whitley. If there is a possibility that funding could be secured before 2041 then at least the public transport corridor should be built	Noted however the plan cannot be so prescriptive and the changes proposed sit beyond the scope of the review	No change

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						<i>The level of need and expected provision will be determined through Transport Assessments and Travel Plans.</i> Whitley Business Park is identified as a major trip generator. The Local Democracy Reporting Service was told in January 2025 that the business case for the Very Light Rail route to the airport site "makes far more sense." and the new priority route will go to the investment zone via a south-east loop route through Whitley. In the 2022 Strategic Outline Business Case for Very Light Rail it said that transport corridors have already been built into masterplans. However there is no reference to Very Light Rail or a public transport corridor in the Policy DS4 (Part B) Whitley Specific Masterplan Principles. As there is no reference to Very Light Rail this suggests that it is not expected to fund the system before 2041.	into masterplans for Whitley developments as has been done for other masterplans.		

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Oxalis on behalf of Hallam Land (ID46)	DS4 :D		N	N	Y	As Planning Agents acting on behalf of HL and the Trustees of the Eastern Green Land Pool Trust, we have an ongoing interest in the Eastern Green mixed-use allocation referred to in these representations, now known as 'Pickford Gate'. Policy DS4 Part D in the CCCLP concerns specific principles of development for the Eastern Green allocation. Criterion 'X' of that policy requires the development to 'Make appropriate provision to aid future integration of the new rapid transit route within the site once the final route is known'. In conjunction with CCC, it was envisaged at the time of the existing adopted Local Plan, and when the Outline planning permission was granted, that CCC aspired for a rapid transit route to enter and exit the Pickford Gate site via the eastern boundary of the site (via Juniper Park). Since development of the site has progressed, including approvals of key infrastructure corridors within the site, CCC have made it clear that their application to link the 'Public Transport Corridor' through Juniper Park has since fallen away. This was the Council's	Policy DS4 should be modified to remove 'Part D' Criterion 'X' in light of the information set out above.	Noted however VLR is still under development and these are points of detail which can be made through the planning application process at a point which reflects current context	No change

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						envisaged route for the rapid transit corridor, and the eastern boundary of the site is considered the only feasible opportunity for the site to integrate a major new dedicated public transport network (as allowed for via the planning permission). Therefore, if the link to the site boundary via Juniper Park will no longer be pursued the Pickford Gate site can no longer provide a rapid transit route. Delivery of the rapid transit connection was always to be delivered in conjunction with the Council who controls Juniper Park and who would deliver any future rapid transit system up to the site boundary. In the absence of progress with the envisaged link to join the approved corridor within the Pickford Gate site (and planning permission), it is unclear how the proposed retained criterion 'X' can be delivered. The wording implies there may be other future routes or links into the site proposed, but that ignores progress made with reserved matters having been submitted and approved in some phases of the site, and other applications with CCC for determination. Third party developers			

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						have now bought or are in the process of buying other phases or parcels, and in order to deliver the housing allocated to the site, these partners require clarity and confidence regarding the policy context and expectations of the Council and Local Plan. Given the planning status of the Pickford Gate site, a loosely worded and open-ended policy criterion such as that proposed currently is entirely inappropriate and unworkable. We therefore object to the soundness of Policy DS4 Part D, on the basis that criterion 'X' can no longer be delivered. This requirement of the policy for the Pickford Gate site should be removed. Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025.			
KOGG/ Merle Gering (ID32)	DS4	N		N	Y	Policy DS (4a) should also refer to unmet employment and housing need.	Policy DS (4a) should also refer to unmet employment and housing need.	It is not necessary to refer to unmet need in this masterplanning	No change

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								policy and this is an approach considered sound in the adopted plan	
Stride Treglow n on behalf of Coventry University Group (ID61)	DS4	Y	Y	Y	Y	The University Group has reviewed the Reg 19 Local Plan. Rather than support a University Group Masterplan within Policy DS4, it considers an alternative suggested policy aimed at the University Group Campus is included as a new Policy CC2 within the City Centre Chapter. Accepting that major employment opportunities at JLR are to be addressed by the Policy, the policy is principally aimed at sustainable urban extensions, where comprehensive masterplanning is encouraged. A focus on the University Group Campus in the City Centre is advocated by references at paragraphs 6.47, 8.15 and Policy CO1. While it is justified to define the extent of the City Centre Campus in the Plan, not all University Group assets will be subject	No modifications are sought. This representation is made in the interests of supporting a positive, justified and effective plan. In this context, the change to the Plan is not linked to Policy DS4 but via a new Local Plan Policy in Chapter 14.	Noted	No change

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						to major interventions. Referencing connected “mini-masterplans” for defined University Group areas within the City Centre (such as The Cathedral Quarter and Civic Centre) will result a positively crafted and justified Local Plan. This approach would ensure that appropriate clarity and importance is placed upon the role that University Group Masterplan(s) can continue to play to deliver positive outcomes linked to education, employment, connectivity, sustainable development objectives, student and staff wellbeing, social infrastructure generally, public realm improvements and the greening of the urban environment.			
Natural England (ID37)	DS4					Natural England generally accepts the rationale behind the policies within your plan. We would express additional support for the following elements. STRATEGIC POLICY Policy DS4 (Part A) – General Masterplan principles 4); xii. Provide fully integrated, accessible and connected multi-		Noted	No change

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						functional green and blue infrastructure which forms strategically important links to the surrounding area to provide routes for people and wildlife and open spaces for sports, recreation and play; <u>Policy DS4 (Part B) - Whitley Specific Masterplan Principles</u> vi. Enhance the connectivity of ecology and biodiversity at the Stonebridge meadows Local Nature Reserve (LNR) and Baginton Fields nature reserve. This should include a 'green' connection into the River Sowe along the northern edge of the site and south of the A46; viii. Development should not compromise the presence and ecological value of the River Sowe and River Sherbourne; <u>Policy DS4 (Part D) – Eastern Green SUE Specific Masterplan Principles</u> vi. Provide appropriate green infrastructure along the western edge of the SUE around Pickford Green			

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						Lane to help blend and integrate the development into the wider Countryside; vii. Establish a comprehensive green and blue infrastructure corridor focused along the Pickford Brook and its tributary.			
Warwick District Council and Stratford District Council (ID70)	DS4 (Part B) – Whitley Specific Masterplan Principles					Policy DS4 (Part B) – Whitley Specific Masterplan Principles We welcome point iv: Continue to maximise links and connectivity with surrounding business parks within both Coventry City and Warwick District to enhance the employment hub. Whilst Whitley Business Park in Coventry and Whitley South, SEGRO Park and the Coventry Airport proposed Coventry & Warwick Gigapark site in Warwick District may not all be in the same administrative area, local infrastructure to support those developments must be coordinated and well connected for the benefit of the employment sites and their users, and also to provide benefits for local communities and mitigate the impacts of these employment sites to the wider public.		Noted	No change

Specific paragraph comments (non-policy)

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
CPRE (ID12)	Para 3.6-3.9				Y	The Plan applies the output from the HEDNA (2022) and proposes Local Housing Need for Coventry for the period 2021-2041 as 29,100 houses (1,455 per annum). The HEDNA covers Coventry and the five Districts of Warwickshire. However, for the Warwickshire Districts notably Warwick and Stratford-upon-Avon, which are at Reg.18 stage, new (Dec 2024) NPPF policy requires the use of annual housing numbers using the new standard methodology ('NSM') which are on a different basis. This is all the more justified because the differences between old Standard Method (SM) and the NSM balance Coventry against the 5 Districts closely: Dwellings per annum (DPA) Coventry old SM: 3082 NSM: 1388 - 1694	Section 3.6-3.9 should be amended to state: that the Housing target per annum in the Dec 2024 NPPF (New Standard Method) will be used to set Coventry's housing need figure. The housing need for Coventry is to be 27,760 (1,388 per annum). This change will make the Plan sound.	Noted, however the plan is using the HEDNA figures as it is being considered under the transitional arrangements (2023 NPPF)	No change

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						Warwickshire (all 5 Districts) old SM: 2315 NSM: 3907 +1592 The HEDNA and the supplementary Review of Coventry's Housing Need (June 2024) conclude that the annual housing requirement for Coventry is 1455 houses (para 3.9). This is very similar to the NSM's target (1388). There is joint working on housing requirements between Coventry and the Warwickshire Districts and the Duty to Cooperate requires this. Using two different methodologies for the one Housing Market Area and sub-region is not justified. The housing need for Coventry should be 1,388 dpa; for the Plan Period 27,760 dwellings (not 29,100). This should not be described as a minimum.			
KOGG/ Merle Gering (ID32)	Paras 3.6- 3.9	N		N	Y	Housing Need (paras 3.6-3.9) should be replaced with a maximum housing need of 1388 dpa in line with the New Standard Methodology and that this is generally consistent with the evidence set out under the HELAA and similarly Para 6.9 and 6.10).	Housing Need (paras 3.6-3.9) should be replaced with a maximum housing need of 1388 dpa in line with the New Standard Methodology and that	Noted, however the plan is using the HEDNA figures as it is being considered under the	No change

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							this is generally consistent with the evidence set out under the HELAA and similarly Para 6.9 and 6.10).	transitional arrangements (2023 NPPF)	

Chapter 4 – Health and Wellbeing

Policy HW1 - Health and Health Impact Assessments (HIA)

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Tyler Parkes on behalf of PCCWM (ID69)	HW1	Y	Y	N	Y	The PCCWM was supportive of this chapter at Regulation 18 stage for the reasons given in his representation. Whilst these are generally reflected in the reasoned justification and proposed wording of Policy HW1, nevertheless it is disappointing that an updated Health SPD and a checklist to assist in factoring in health considerations for smaller applications has not been produced in the meantime to ensure that the matters raised by the PCCWM have been fully taken into account.	The PCCWM requests that an updated Health SPD is prepared swiftly to sit alongside emerging Policy HW1.	Updated health SPD is under preparation, and timescales are set out in the local development scheme.	No change

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						The PCCWM therefore requests that an updated Health SPD be prepared swiftly to sit alongside emerging Policy HW1.			
Home Builders Federation (ID21)	HW1	N	N	N	Y	STRATEGIC POLICY, Policy HW1: Health and Health Impact Assessments (HIA) <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 43. Although HBF recognises that health is an increasingly important public policy consideration and that Health Impact Assessments (HIAs) can make a useful contribution to plan-making and scheme design, but their use needs to be proportionate. A requirement for all major development (over 10 houses)	Please refer to representation	No reason is provided for why the requirement for major developments is disproportionate. Also, for some major developments of 10 dwellings or more the threshold for requiring a full HIA won't be met and instead applicants will be required to demonstrate how health considerations	No change

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						to require a HIA Screening report seems disproportionate. 44. It is not appropriate to reference a current or future SPD within a Local Plan Policy wording as this would give SPD Local Plan policy status. Any SPD should only be mentioned in the supporting text.		have been considered in the D&A statement. SPDs provide further guidance/advice and so referencing this in the policy wording is considered entirely appropriate.	

Specific paragraph comments (non-policy)

Stride Treglo wn on behalf of Covent ry Univer sity Group (ID61)	4.1- 4.1 0	Y	Y	N	Y	Notwithstanding comments made in relation to the supportive text of Policy HW1, the University Group wishes to object to the current drafting on the grounds that the scope of future Health Impact Assessments is not sufficiently clear to enable applicants to invest time in their preparation without knowing whether these are fit for purpose and will meet updated validation requirements. The current HIA SPD is referenced in the November 2024 Health Background Paper but is undated, appears to have been prepared just after April 2017 and refers to a previous NPPF iteration. While it is acknowledged that the Council will update the Health Impact Assessment SPD to provide guidance, the University Group considers that this is required to sit along Policy HW1 and should be in place by the time of adoption (with adequate time for consultation to be held to inform its content).	While the University Group observe that the HIA SPD is a helpful reference point, it considers that it would be appropriate and prudent to capture the principles of health and wellbeing as part of an outline application, with detail supplied as part of Reserved Matters submissions – similar to the way in which a baseline Travel Plan established at outline stage is developed once an occupier is known. The use of pre-occupation conditions would be appropriate in relation to HIAs. This representation is made in the interests of producing a sound plan which references up to date evidence and source data as to the implementation of	Updated health SPD is under preparation and will provide the requested scope in line with the timetable in the local development scheme and this will be consulted on accordingly. The approach taken at the outline and reserved matters stages are supported by consultation responses at the reg 18 stage. However, there will be further, detailed and appropriate consultation on	No change

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						While the University Group observe that the HIA SPD is a helpful reference point, it considers that it would be appropriate and prudent to capture the principles of health and wellbeing as part of an outline application, with detail supplied as part of Reserved Matters submissions – similar to the way in which a baseline Travel Plan established at outline stage is developed once an occupier is known. The use of pre-occupation conditions would be appropriate in relation to HIAs.	policy and offering clarity as to the up-to-date requirements of submitting a HIA in support of a planning application.	this as the SPD is developed.	

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Stride Treglow on behalf of Coventry	4.5-4.6	Y	Y	Y	Y	The University Group acknowledges that the City Council is seeking to reduce the differences in health inequalities and health outcomes that exist in the City and improve the wellbeing and life changes for residents. Through its Research Institute for	No modifications are sought. This representation is made in the interests of supporting a positive, justified and effective plan. To seek ongoing collaboration with the Council to share best	Comments of support and offer of collaboration noted.	No change

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University (ID61)						Health and Wellbeing, the University Group already does a lot of work with the City Council addressing health inequalities. The University Group has secured funding from NIHR for a collaboration led by Coventry City Council in partnership with UHCW, Warwick University and UCL. In accordance with the Marmot Principles referenced on Page 25 of the Submission Draft, the University Group runs a well-regarded Health and Life Sciences Faculty and is engaged in multiple research initiatives in the field of health inequalities and health outcomes. Subject to issues of commercial or other confidentiality, the University Group would be keen to investigate health-based knowledge transfer sessions with the Council to ascertain the degree to which collaborative work could feed into the	practice and promote joint initiative, while potentially benefitting from academic research undertaken locally.		

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						evidence base for the Local Plan Review. The University Group will endeavour to review the inter-relationships between Active Travel and Health (physical and mental) benefits generated by their support for sustainable and active travel initiatives and programmes.			

Chapter 5 - Jobs and Economy

Policy JE1 - Overall Economy and Employment Strategy

Respo ndent / organi sation / agent	Sect ion	Compl ies with Duty to Coope rate Y/N	Legall y Comp liant? Y/N	Soun d Y/N	Does respo nden t wish to appe ar at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transp ort for West Midlan ds - West Midlan ds Combi ned Author ity (ID67)	JE1	Y	Y	Y	N	N/A	Policy JE1 (economic and employment strategy) could provide stronger references to improving sustainable transport links to employment sites.	CCC considers that both point G and the supporting text of the policy addresses TFWM concerns.	No change

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NBBC (ID44)	JE1			N	Y	Nuneaton and Bedworth Borough Council (NBBC) has worked with Coventry City Council (CCC) on a range of cross boundary strategic matters in accordance with the Duty to Cooperate. The NBBC Borough Plan Review (BPR) is at an advanced stage of preparation with the Regulation 19 Examination in Public hearing undertaken in July to October 2024. Policy JE1: Overall Economy and Employment Strategy states the Plan will provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period. The policy is inconsistent with the preferred approach towards employment which is to protect Green Belt land and seek to locate the shortfall derived from the approach outside of CCC boundaries. A range of employment sites to meet Coventry's local employment need has not been identified and are not readily available to meet the needs throughout the Plan period. The policy intends that job opportunities arising from employment development are accessible to	Identify further sources of supply within the CCC administrative boundary. Should there still a shortfall identify where the supply will be met.	Whilst extensive work has been undertaken, as shown via the evidence base, call for sites exercises and background paper, CCC will continue to review potential sources of further employment land supply and welcomes on-going engagement with NBBC on employment land provision. At a FEMA level this will include an	No change needed to the wording of JE1

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						all of the city's working age residents, particularly priority groups and those in the most deprived areas of the city. NBBC supports the intention of the policy but considers it less likely to occur if over 40% of the employment land needs to be located beyond CCC boundaries. Sites have been omitted following the HELAA analysis which could contribute towards Coventry's local employment need. The needs of small businesses are potentially met by the Plan but not accounted for in the supply position (See Policy JE2).		updated MoU and individual SoCGs where applicable including further work on employment land recycling.	
MSP+D Ltd (ID35)	JE1 and Para 5.19	N	N	N	Y	The submitted Regulation 19 Coventry City Council Local plan policy DS1 "overall Development Needs, bullet points 3 and 4, are not legally compliant, sound or comply with the Duty to co-operate because: 5. Local Plan Review – Duty to Co-operate Statement. Page 11 of this document states that:	To make the Coventry City Regulation 19 Local plan sound, the following changes are required to the submitted Reg 19 Coventry City Plan. 14. At least 45 hectares of land for employment use needs to be also allocated outside Coventry's	The evidence base shows that Coventry cannot accommodate enough land to meet its identified employment need. CCC will continue to work	No change to JE1 needed

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						<i>“As with Housing, the HEDNA was the starting point for assessing employment need. However work was also ongoing across the wider West Midlands region in terms of assessing strategic site (ie ‘big box’) needs as this has different site and locational requirement to local employment provision. The West Midlands Strategic Employment Sites Study (WMSESS) was finalised in September 2024, the result of a partnership of those authorities engaging in the West Midlands Development Needs Group referenced earlier in this paper. This details ‘opportunity areas’ for further exploration, and for Coventry this relates to ‘Area 7’ which will primarily relate to further joint working with Rugby Borough. Coventry is highly constrained and has no new sites which would meet the criteria set out in the study therefore discussions will be required as Rugby progresses its local plan.</i>	administrative boundaries. This excludes additional employment land required to meet strategic “big box” needs of the sub region. 15. Statements of Common Ground between Coventry City Council and Coventry’s neighbouring Local Planning Authorities need to be prepared and proposed sites subject to separate public consultation, identifying major new employment sites which will meet both Coventry’s and the West Midlands employment needs both within and also outside Coventry’s	proactively with colleagues across the sub-region to seek to address the FEMA employment land supply and delivery. An MoU and SoCGs are being prepared, see DtC compliance statement. The role of the Green Belt in neighbouring areas is beyond the scope of this Local Plan review.	

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						<i>On this particular (employment) issue, the total local need figure for Coventry for the period 2021-41 was calculated to be 105 hectares. From this Coventry had a supply of 60 hectares and a residual need of 45 hectares. Despite repeated Call for Sites, Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it is unable to accommodate a 45 hectare shortfall. It has also made them aware that a Green Belt site (11 hectares developable to the east of the city) is being promoted but that it has been rejected through site assessment.</i> <i>Discussions are ongoing through CSWAPO and with the linked duty to Co-operate Group and associated Local Authorities in regard to this matter, but this currently remains an outstanding issue that has not yet been resolved. In part this is because most partner authorities are at earlier stages of plan preparation.</i>	administrative boundaries. 16. These sites then need to be identified within the Reg 19 Coventry Local Plan and also in the forthcoming neighbouring Local Planning Authority's Reg 19 Development plan reviews for submission in 2025/26. 17. If Statements of Common Ground identifying major sites which can deliver the shortfall of employment land cannot be agreed between Coventry City Council and the adjacent Local Planning Authorities then there needs to be a		

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						<i>The authority is continuing to work to develop an MoU with partners and working to establish Statements of Common Ground.</i> 6. The HEDNA Alignment Paper Considers that Coventry City Council should provide 105 ha of new Employment Land (B2 and B8) excluding any contribution to the strategic “big box” needs of the sub-region. Planning Assessment Paragraphs 24-28 of the NPPF of December 2024 sets out National Planning policy relating to maintaining effective co-operation in the plan making process, including the need to provide Statements of Common Ground. The Regulation 19 submitted plan’s evidence base does not provide Statements of Common Ground with Coventry’s adjacent Local Planning	new employment policy within the Reg 19 Coventry City Local Plan. 18. This new employment policy would support new employment site allocations on sustainable development sites within close proximity to the City’s own administrative boundaries which can deliver both Coventry’s and the sub regions employment needs. 19. To deliver the acknowledged shortfall of employment land, the Coventry Local Plan also needs to have a policy which states that the		

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						Authorities which specifically identifies employment site allocations for employment uses which meets the shortfall of employment land of 45 hectares so as to meet Coventry's employment needs either inside or outside its administrative boundaries – as well meeting strategic “big box” employment needs of the sub region.	green belt boundaries of all of Coventry's adjacent Local Planning Authority's need to be reviewed in order to help the delivery of major new employment sites. 20. Some of the identified new major employment sites will therefore need to be released from the green belt because there is evidence that there are “exceptional circumstances” to do so and the these sites also no longer meet green belt designation criteria or are identified as “grey belt sites” in accordance with		

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							the NPPF of December 2024.		
Coventry and Warwickshire Chamber of Commerce (ID8)	JE1	N	No response	N	Y	As noted in the text this policy, JE1, should create a framework that facilitates “a pivotal role of the City in the ambitious growth agenda for the region”. The first point to make is that the rhetoric in this policy is not matched by the proposals that underpin the policy. While the City Council has indeed set out an ambitious growth agenda, the proposals themselves fail to meet projected employment need. Instead, as noted elsewhere they seek to effectively “export” economic growth to surrounding areas. Overall, the policy cannot be said to match the objectives that support it. For this central reason the policy is unsound. In addition, the absence of any formal arrangements between local authorities or specific additional information regarding the task of to accommodate the unmet need in surrounding local authority areas, the Council’s	As noted in the response to policies DS1 & DS2, the Chamber considers a new approach is needed to seek to accommodate all the city’s projected employment requirements within its boundaries. As an alternative the Chamber has suggested that consideration could be given to looking to accommodate exported growth in surrounding areas. However, the absence of any information relating to the status of current joint working between authorities across the sub region means it is difficult to form a view	CCC has and will continue to explore all reasonable opportunities for employment land supply and continues to work proactively with neighbouring authorities on such matters. This includes and updated MoU and Statements of Common Ground where applicable, see	No change to JE1 needed

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						stated approach appears currently impossible to achieve. This policy seeks to provide a <i>“readily available range and choice of employment sites and premises to meet projected need over the plan period.”</i> It fundamentally ignores a body of evidence (for example the background studies undertaken by Ilene , the C&W Market Signals Study of 2017, and the direct experience of members of the Chamber of Commerce) that highlights gaps in existing provision and land and premises and by not adding in any new employment land allocations it compounds existing shortages across many types of land and premises. For example, freehold tenure smaller sites and business units available for small and expanding local businesses are in very high current demand and are in very short supply in and around Coventry. The proposed employment land provision relies substantially on allocations made in the 2017 adopted Local Plan. These sites have been slow to come	whether this is an achievable and realistic approach . The inspector /examiner of the plan will need to take an informed judgement on this key issue.	DtC compliance statement	

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						forward and there is little evidence that the Council has been proactive in seeking to bring many of these sites forward. Moreover, there is no indication in the policy framework of timing-when the City Council thinks these sites may indeed come forward and contribute to a pool of readily available sites and premises. In terms of Policy JE1(d) which aims to protect existing employment sites and prevent their redevelopment for non-employment uses is strongly welcomed by the Chamber of Commerce and reflects policies in neighbouring areas that seek to protect existing stock. The Chamber considers this policy in a separate submission below.			
Stoford Develo pment s(ID60)	JE1	N	Y	N		We support criterion 1.g. of Policy JE1 which states that the Council will “ensure that new research and development, light industrial, general industrial and storage/ distribution developments are appropriately sited and designed to maximise their accessibility by a choice of means of transport, have an acceptable		Comment noted	No change

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						impact on the highway network and to minimise the potential for environmental conflict with nearby sensitive land uses". Sustainability is a key theme running through the National Planning Policy Framework and sustainable transport should be promoted, as set out in section 8 of the NPPF by identifying and pursuing opportunities to promote walking, cycling and public transport use. For plan-making this means that new employment sites should be close to housing, where possible, and opportunities for sustainable transport. Where sites are identified to meet the shortfall in Coventry's local and strategic requirement, regard should be had to this criterion of policy JE1.			
North Warwi ckshire Boroug h Council (ID43)	JE1c			N	N	Please see Local Development Framework Sub-committee report of the 26th February 2025. The Borough Council welcomes the opportunity to work with Coventry City Council. The Borough Council also supports Coventry City Council in being able to meet their need for housing and,	The Plan and Policy hasn't indicated or provided for the projected need over the plan period. Further work is considered necessary to determine if all or part of the 45 hectares could be	Comments welcomed and noted. CCC will continue to explore all reasonable opportunities for	No change to JE1 needed

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						also, for the needs of the Gypsy & Traveller community. However, in light of the 45 hectares indicated shortfall this will make Policy JE1 (c) difficult to achieve and implement without indicating how and where the 45 hectares will be addressed to meet the required need.	accommodated within Coventry City's boundary. If there is still a shortfall, then, if necessary, discussions with adjoining local authorities, as to how and where this shortfall will be addressed and distributed will be required.	employment land and welcomes on-going discussion with NWBC.	
Oxalis on behalf of Hallam Land (ID46)	JE1	N	N	N	Y	Section 5 of the CCCLP sets out the Council's approach to the overall economy and employment strategy. It details that the Council will work positively and proactively with the business community in the city, inward investors, the City's two Universities, key public sector employers, partners, and neighbouring local authorities to support sustainable economic growth and job creation. Part 1 (C) of the policy explains that the Council will (our emphasis): "Provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period	Policy JE1 could be considered 'sound' if the employment land requirements are planned for appropriately either by allocating sufficient sites, or through a statement of common ground or memorandum of understanding with duty to cooperate partners.	The evidence base is considered robust. CCC continues to explore all reasonable employment land opportunities and is working on an on-going basis with colleagues across the sub-	No change

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						related to growth of the city's population and the pivotal role of the city in the ambitious growth agenda for the sub-region" This policy cannot be considered achievable on the basis that employment land requirements are not proposed to be met and therefore positively planned for (As set out in Sections 2 and 3 of the draft Local Plan), and an insufficient supply of new employment sites are provided to meet the projected need over the plan period. As set out in section 5 of the CCLP, employment policies are based on the following documents, that form part of the evidence base: •Housing and Economic Development Needs Assessment (HEDNA) (2022)• Employment Land Review (ELR) (2024) and ELR Office Market Addendum(2024)• Housing and Employment Land Availability Assessment (HELAA) (2024)• West Midlands Strategic Employment Sites Study (WMSESS) and Coventry andWarwickshire Alignment Report (2024)• Coventry City Council		region to explore the provision of employment land within the FEMA. See DtC compliance statement re MoU and SoCGs	

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						Economic Development Strategy 2022-2027• Local Plan Review Employment Background Paper (2024)The Iceni 'Housing and Economic Development Needs Assessment 2022' made a key conclusion that there is a need to commission a further study to specifically consider the needs for strategic logistics. The subsequent 'West Midlands Strategic Employment Sites Study 2023/24' published August 2024, provides advice on site criteria, and although this is in relation to strategic sites, it identifies the A45 corridor (Area 7) as having high demand and resulting takeup, and 'rents achieved are some of the highest in the Midlands market'. Further, it explains that 'Coventry has relatively high levels of unemployment', which only further highlights the importance of delivering adequate employment land supply. An up to date, proactive and forward-looking evidence base is essential to inform the new local plan. Retrospective, or backward-looking past trend-based evidence will only serve to			

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						perpetuate historic missed opportunities to fully plan for the needs of the City's economy. While the HEDNA has considered a number of scenarios and sources of evidence of need and demand, it is important to note that the analysis undertaken is essentially trend based. Given the historic under-supply of large-scale sites across the wider region and a relative lack of allocations of such sites through past Local Plans in the West Midlands (and elsewhere), any trend-based projection of need and demand will inevitably be an under-estimation. In addition to the above, supply needs to be considered to meet the replacement supply demand of existing businesses within Coventry who seek new premises better suited to their evolving requirements, and to allow modern modes of operation. This need is recognised in the evidence base, and the availability of sufficient land is critical if this natural 'churn' in the market is able to take place. New replacement employment premises – redeveloped existing			

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						sites or refurbished buildings – can make a notable contribution to improving the quality of existing supply by delivering modern units with, for example, greater energy efficiency or renewable energy opportunities which helps meet the ESG or sustainability aims of many occupiers which are not currently or easily met in older, existing employment buildings. Evidence which forms part of these representations highlights that the overall need for employment land in Coventry City is greater than that assumed by the CCC evidence base. Therefore, in reality the shortfall between requirement and proposed new land supply is also more significant than the 45ha, in both quantitative and qualitative terms, than that identified by the CCCLP and its supporting evidence base. Savills have prepared a report (Industrial and Logistics (I&L) Needs Assessment February 2025) which reviews and assesses the robustness of the employment evidence base. It draws conclusions on employment land			

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						requirements based on Savills' own assessment of needs that considers historic under delivery of sites, as well as forecasted future growth. Please find the report enclosed. The Savills report critiques the evidence base for employment land needs in support of the Local Plan comprising the 2022 HEDNA, 2024 WMSESS, and West Midlands Strategic Employment Sites Study (WMSESS) and Coventry and Warwickshire Alignment Report (2024). It assesses that the identified employment land requirements are formed by an analysis of trend-based data, which does not consider market indicators. Recent market trends indicate through the high absorption rates, low stock availability, and increased rental values that the market has historically (and currently) been constrained by supply, therefore resulting in inhibited take-up. The trend-based assessment in the Council's evidence base, therefore, does not consider these market conditions and in turn underestimates the actual employment land			

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						need requirements. This does not accord with NPPF Paragraph 32 (Dec 2023) which specifically requires policies to “take into account relevant market signals”. The Savills report uses their own assessment methodology which considers market signals in accordance with NPPF paragraph 32, which is becoming a well-recognised method of accurately identifying employment land requirements. In summary, this assessment concludes that the employment land requirements across the FEMA are underestimated, as is Coventry’s share of the non-strategic employment need across the FEMA. Accepting the Council’s identified supply of non-strategic sites at 67ha (some sites of which are identified to be constrained by Savills), Savills conclude that the unmet need is 72 - 86ha, which is significantly greater than the 45ha recognised within the CCCLP. Whilst the CCCLP acknowledges the unmet need in relation to non-strategic employment need, it goes little way to discussing the requirements of			

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						employment land for strategic sites of 25ha or more, or 9,000sqm+, a requirement set out in the WMSESS 2024. The WMSESS 2024 draws conclusions based on areas of opportunity, and 'Area 7' falls within the administrative boundaries of Rugby Borough and Coventry City. Responsibility therefore falls on these authorities to allocate sites to meet this identified unmet need of 9 – 84ha as set out in the 2024 Alignment Paper. Work done by Savills for HL challenges this need figure, suggesting the need for strategic sites is higher. The unmet need for strategic sites is in addition to the strategic site allocation set out in the CCCLP JE2:4 for 25ha, which is already identified in the WMSESS 2024 as a pipeline supply site and therefore does not meet that shortfall set out above. There is no clear evidence published between CCC and Rugby Borough that sets out how this unmet (strategic or non-strategic) need will be delivered between the authorities, and CCC should therefore make information publicly			

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						available as to how the Duty to Cooperate Partners are working together to meet this need. In general, the recognised unmet employment land need for non-strategic sites and failure of CCC to fully assess and set out the approach to meeting strategic employment land requirements, demonstrates a negative approach to employment development. This in turn undermines CCC's approach to the local economy, and contradicts the approach set out in 'The Vision' section of building a strong, responsive, and competitive economy. Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025. Officer comment: See full representation for further information			
Turley on behalf of the	JE1	Y	Y	Y		The University of Warwick is a world class higher education institution, ranked 10th in the UK and 69th in the world. Now in its 60th year, the University is currently celebrating six decades of	Given the recent adoption of the SPD for the University campus, the University consider it would be	Comments noted. CCC considers agrees that reference to the	Insert point K into policy "Is in line with the University of

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Univer sity of Warwi ck (ID68)						transformative education, research and innovation. The University is recognised as a leading employer, with over 7,300 direct employees, playing an important role within the local economy as well as being of national and international importance. The University of Warwick was founded in 1965 and has had approved masterplans throughout its history, most recently the 2009 Masterplan Outline Planning Permission and the 2018 Capital Plan Hybrid Permission, which have guided recent developments on campus such as the Lord Bhattacharyya Building, Oculus, the Slate, the Sports Hub, Cryfield Village, the IBRB at Gibbet Hill, the Warwick Arts Centre extension, the new Faculty of Arts Building, along with two new multi-storey car parks at Lynchgate and Kirby Corner.	beneficial for the SPD to be mentioned within this policy.	SPD should be made.	Warwick Campus Framework Masterplan Supplementary Planning Document"

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						The next phase of development is now underway, with proposals for a new Social Sciences Quarter including new buildings for the Business School, and a multi phase refresh of science, technology, engineering and mathematics (STEM) facilities around a new Science and Engineering Precinct in the heart of campus, both being granted planning permission in 2024. The University has worked collaboratively with the City Council and Warwick District Council over the last 12 months to prepare a Supplementary Planning Document for the campus which was adopted by both authorities in December 2024. The SPD reflects the University's Capital Plan for future investment in the campus up to 2033. The recognition and support that Policy JE1 gives to the growth of the city's Universities, and how this can maximise the economic development and other community benefits associated with			

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						them, at part I, is supported and welcomed. The commitment the Council gives to working positively with the University at Part a of the policy, which recognises the role the University plays in promoting innovation, is also welcomed. The University campus is home to Warwick Arts Centre multi venue arts complex which attracts c300,000 visitors a year. It is the largest arts centre in the Midlands and recently underwent a significant refurbishment and extension, reopening for events in 2021. The Warwick Arts Centre is an important visitor attraction and asset within Coventry and the wider region. Part h of Policy JE1 provides support for tourism/visitor related development at the University of Warwick campus. The recognition of the role that the Arts Centre and the wider campus makes in the tourism and visitor economy and the support given to further tourism/visitor related development here is welcomed.			

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						Given the recent adoption of the SPD for the University campus, the University consider it would be beneficial for the SPD to be mentioned within this policy.			
Stante c on behalf of SEGRO (ID58)	JE1	N		N	Y	POLICY JE1: OVERALL ECONOMY AND EMPLOYMENT STRATEGY 6.1 This section relates specifically to the need position in Coventry for 'strategic B8' uses. The need position for Coventry's local employment needs has been addressed in the preceding section. 6.2 SEGRO as a leading owner, manager and developer of modern warehouses and industrial property, with premises across the Midlands are very close to the market. SEGRO agree that the logistics sector operates at the strategic scale and therefore that the need for this particular type of floorspace should be calculated separately from the other employment uses and suggest there is a need for this use type of need to be safeguarded through specific and separate allocations.	SEGRO would welcome further clarity in relation to the sites outside of Coventry's administrative boundary that are identified to meet the identified need for 'strategic B8' floorspace in Coventry and the wider sub-region.	Coventry is engaging actively with its partners in the FEMA, and neighbouring local plans are all progressing at different rates. However the site selection process for those local plans is determined by those local authorities themselves: an update on progress will be	No change

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						6.3 SEGRO recognise that the Proposed Submission Plan, and its evidence base, acknowledges that 'strategic B8' land needs should be calculated separately from local employment need as 'strategic B8' can only be considered at the regional scale. However, SEGRO are concerned that no sites have been allocated in Coventry City's authoritative boundary or identified outside of its administrative boundary to meet this 'strategic B8' need and therefore are of the view that the Proposed Submission Plan will not meet the test of 'soundness' as it is not 'positively prepared' or 'effective' in accordance with paragraph 35 of the NPPF as it has not demonstrated that the Policy JE1 has identified a sufficient supply of sites to meet the area's objectively assessed needs. 6.4 The HEDNA provided a calculation for 'strategic B8' which is the growth of the logistics sector, and which related to warehousing units over 9,000sq.m (100,000 sq.ft). Because of the		sought to inform the EiP as plans progress.	

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						scale and nature of this kind of development it needed to be considered at a strategic scale therefore the need across the whole of the Coventry and Warwickshire sub-region was projected to be 551 hectares to 2041. 6.5 Through the previous reps, Stantec noted that the Issues and Options consultation document does not provide any further context or direction as to how the HEDNA identified figure of 551 hectares will be distributed amongst the authorities that make up the sub-region or how much Coventry City are expected to contribute towards this need. 6.6 Since the Issues and Options consultation, the West Midlands Strategic Employment Sites Study (WMSESS) was published in September 2024. The focus of the study is strategic units for manufacturing and logistics, defined as being those of a size over 100,000 sq.ft. (9,300 sq.m.), and strategic sites typically 25 hectares and over. The study aimed to provide an updated position on committed sites, identify the need for large			

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						scale strategic logistics and manufacturing, seek to address the requirements of modern industry, provide recommendations on the number and type of strategic sites required and advise on phasing and priority. 6.7 The WMSESS quantifies the amount of strategic need across the wider West Midlands Study Area. It identifies areas of opportunity, based on a number of factors including locational requirements, for where this could be accommodated. Coventry falls within 'Area 7', focusing on Coventry, Rugby, Nuneaton and Warwick in particular around the M6, A45, A46 and M45. 6.8 The Coventry & Warwickshire HEDNA – WMSESS Alignment Paper was published in September 2024. The alignment paper was produced to consider the relationship between employment land need recommendations in the West Midlands Strategic Employment Sites Study (WMSESS) 2023/24 and the Coventry and Warwickshire Housing and Economic			

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						Development Needs Assessment (C&W HEDNA) 2022 6.9 In the alignment paper, Strategic Sites need is considered between 2022 and 2045 to align with the WMSESS and to allow for the differing timelines of local plan production across the Coventry and Warwickshire sub region. For Area 7, a range of between 9 – 84 hectares residual strategic sites need is identified. The report does not clarify how much of this range of residual strategic sites need to be met by Coventry City specifically. The Background Paper Growth Needs clarifies that “Strategic Employment Need is being discussed with partners in relation to the wider Opportunity Area 7 relating to Rugby, Warwick and Nuneaton & Bedworth and so cannot be disaggregated into a meaningful requirement specifically for Coventry.”. 6.10 The Council’s Growth Needs Background Paper summarises the position in relation to the supply of sites capable of contributing towards the residual strategic sites need concluding that			

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						“Coventry has no sites of this scale being promoted and is working with its partners on Opportunity Area 7 to address the matter”. Therefore, Policy JE1 cannot be considered to be, in accordance with paragraph 35 of the NPPF, ‘positively prepared’ as it does not seek to meet the area’s objectively assessed needs and neither is it informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated achieving sustainable development or ‘effective’ as it is not based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred as it defers the identification of sites capable of meeting a strategic need to a later date. 6.11 SEGRO consider that it is important Coventry City correctly identifies its employment need, including that of ‘strategic B8’ land, to provide a base to work from and for any unmet need to be met by Coventry’s neighbours;			

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						closest to where the need arises. This would include Rugby Borough. 6.12 One of the recommendations to Coventry City in the ELR is as follows: “Collaborating with neighbouring authorities to meet regional employment needs, particularly for strategic B8 uses, to manage land availability constraints and foster effective joint working.” 6.13 The NPPF seeks to promote sustainable development. This includes locating new development close to employment opportunities, shops and services and public transport routes. As such, any unmet need arising from Coventry City should be delivered adjacent to Coventry’s boundary. 6.14 The Local Plan Review Duty to Co-operate Statement Regulation 19: Proposed Submission stage specifically refers to discussing accommodating the residual strategic site need identified for the ‘Area 7: M6 / A45 / A46 / M45 Coventry & Rugby’ with Rugby Borough through Rugby’s own Local Plan Review:			

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						“Coventry is highly constrained and has no new sites which would meet the criteria set out in the study therefore discussions will be required as Rugby progresses its local plan.” 6.15 The employment site in Rugby Borough located at land to the east of the A46 provides a suitable opportunity and sustainable location to deliver Coventry’s unmet ‘strategic B8’ need; being adjacent to Coventry City. It will also deliver employment generating development adjacent to planned residential growth thus limiting the need to travel large distances to reach employment opportunities. The site will also capitalise on the planned infrastructure improvements with the delivery of the new A46 Walsgrave junction1 which will replace the existing roundabout junction with the B4082. Therefore, meeting the objectives of sustainable development in paragraph 11a of the NPPF which says that for plan making plans should promote a sustainable pattern of development			

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						that seeks to meet the development needs of their area; align growth and infrastructure. 6.16 The site is also well connected to the wider strategic road network with the M6 being easily accessible from Junction 2. In addition, the site is an advantageous location for the delivery of employment floorspace being located situated along the 'A46 Corridor' as identified in the HEDNA, which is described as one of the two 'corridors' that can play a greater potential role in providing strategic B8 development than they historically have. The site is also situated in the proximity of Junction 2 of the M6, and the 'M6 Corridor' is identified in the HEDNA as a 'key potential' corridor within the sub-region to accommodate strategic B8 development. 6.17 The proposed employment development at the employment site would provide significant employment floorspace to meet the employment needs across various sectors ranging from large scale manufacturing and warehousing occupiers to starter units and			

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						workshops. The delivery in the region of 370,000 sqm (4,000,000 sqft) of high-quality employment floorspace will provide associated benefits and potential linkages to existing and new employers and educational providers along with a targeted package of skills training and employment opportunities for existing and future residents. 6.18 Included at Appendix C is the Vision Document that has been prepared for the employment site at Walsgrave which details the broad specifications of how the site will come forward to deliver a well-designed employment scheme which has been designed using a landscape led approach and benefits from the excellent connections to the strategic road network. 6.19 Development of the employment site will also safeguard a route through for the proposed Very Light Rail, to enable the aspiration for this infrastructure to be realised in the future. This would help to achieve the objective of Policy AC1: Accessible Transport Network to support			

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						the provision and integration of emerging and future intelligent mobility infrastructure, including Very Light Rail. 6.20 SEGRO would welcome further clarity in relation to the sites outside of Coventry's administrative boundary that are identified to meet the identified need for 'strategic B8' floorspace in Coventry and the wider sub-region. Officer comment: See full representation for details			
Savills on behalf of Bellwa y Homes and Merto n College	JE1	N	Y	N	Y	Policy JE1: Overall Economy and Employment Strategy 4.27. It is noted that the policy confirms that the Council will work positively and proactively with businesses in the city, inward investors, universities, public sector employments, partners and neighbouring local authorities to support sustainable economic growth and job creation.	Respondent comment: 'Please refer to representation'	Comments noted. CCC continues to explore all reasonable options for employment land supply and continues to work with colleagues across the sub-region under the	No change

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(ID52)						4.28. However, it is concerning that Coventry City Council have not developed a suitable strategy to meet Coventry's own employment needs within the city's administrative boundary – which will not help to support sustainable economic growth and job creation.		DtC, see DtC compliance statement.	
Stantec on behalf of HGIT Central Coventry Ltd (ID57)	JE1			N	Y	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.	Respondent comment: 'Please refer to representation'.	Noted, and a modification in this regard would be supported	Potential modification to JE1 to support the modernisation and redevelopment of existing employment stock to support the local economy
Stride Treglown	5.1-5.12	Y	Y	Y	Y	The University Group supports the Council's ambition to increase the economic prosperity of the city and region and promote job and	The University Group would like to see the Local Plan explicitly support its R&D	Comments noted. CCC considers that Policy JE1	No change

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behalf of Coventry University Group (ID61)						employment opportunities within the growing sectors. The University Group is actively engaged in academic programmes and research initiatives in support of many of these and is seen as a key engine for growth for the City and wider region. In this regard, the University Group is referenced in a positive light throughout the 2017 Adopted Local Plan, with Policy CC24 of the City Centre Action Plan reflecting the ambition of the University Group at that time. The University Group is operating in an increasingly competitive arena, and ongoing investment is required to ensure that it can continue to shape and influence a global economy and higher education sector. As such, the University Group would like to see the Local Plan explicitly support its R&D endeavour in and around the City Centre via a combination of refurbishment, re-purposing and potentially new build facilities in accordance with its Estate Strategy and growth ambitions.	endeavour in and around the City Centre via a combination of refurbishment, re-purposing and potentially new build facilities in accordance with its Estate Strategy and growth ambitions. The positive economic impact of the University Group's operations across the City is captured in the proposed new Policy CC2 – "Coventry University Group" elsewhere in this representation. The University Group's annual GVA of £1bn nationally and £320m locally deserves explicit reference in the preamble to Policy JE1.	provides sufficient reference to universities and the contribution they make to the cities employment generating uses.	

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						The positive economic impact of the University Group's operations across the City is captured in the proposed new Policy CC2 – "Coventry University Group" elsewhere in this representation. The University Group's annual GVA of £1bn nationally and £320m locally deserves explicit reference in the preamble to Policy JE1.	This representation is made in the interests of supporting a positive, justified and effective plan, which acknowledges the impact of key organisations and delivery partners across the City		
Covent ry and Warwi ckshire Growt h Hub (ID9)	JE1				Y	While the City Council has an ambitious growth agenda, the proposals themselves fail to meet projected employment need. Instead, as noted elsewhere they seek to effectively "export" economic growth to surrounding areas. Overall, the policy cannot be said to match the objectives that support it. For this central reason the policy is unsound. Moreover, as noted above, the absence of any formal arrangements or specific information to accommodating the unmet need in surrounding areas suggests that the Councils stated approach	The Growth Hub believes that further work is needed to identify the 40ha of land that is currently not accommodated in the plan to meet local employment needs. This seems likely to require amendments to the Green Belt boundary. As noted above this can be achieved by a review of the boundary in Coventry and /or in the surrounding local	Whilst CCC considers it has undertaken extensive work in this regard it continues to explore all employment land opportunities within the remit of the spatial strategy. It is working with partners in the	No change

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						is currently impossible to achieve within the timeframe to complete this local plan review. This policy also seeks to provide a “readily available range and choice of employment sites and premises to meet projected need over the plan period. “It fundamentally ignores a body of evidence (for example the background studies undertaken by Icen, the C&W Market Signals Study of 2019, and the accumulated experience of the Growth Hub working with a wide range of clients) that highlights gaps in the existing provision of land and premises. By not adding in any new employment land allocations it compounds existing shortages across many types of land and premises. For example, freehold tenure smaller sites and business units available for small and expanding local businesses are in very high current demand and are in short supply in and around Coventry.	authority areas under arrangements to work jointly.	FEMA and will produce an updated MoU and Statements of Common Ground. See DtC compliance paper.	

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						The proposed employment land provision relies substantially on allocations made in the 2017 adopted Local Plan. These sites have been slow to come forward and there is little evidence that the Council has been proactive in seeking to bring many of these sites forward. Moreover, there is no indication in the policy framework when the City Council thinks these sites may indeed come forward and contribute to a pool of readily available sites and premises.			
Warwick District Council and Stratford District Council (ID70)						Given that the City Council does not believe it can meet its own employment land needs, it is difficult to understand why the City Council does not consider Westwood Business Park, located not far from the local authority boundary with Warwick District, to be a Key Employment Site (sites are set out in Strategic Policy JE2: Provision of Employment Land and Premises) given that this scores reasonably highly in the Employment Land Review. We note that it scores the 8th highest of all employment sites but the city council has drawn the line for Key Employment	In preparing the Regulation 19 Plan, the City Council undertook the Green Belt Technical Update Study (2024) with the conclusion that all green belt, and safeguarded land, was to be rolled forward and remain unallocated for development. The 2024 HELAA produced to support the plan shows all of	The council considers it has a robust evidence base which includes the ELR, several call for sites, and the technical update to the Green Belt review which is considered a proportionate	No change

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						Sites at the top 7 – sites which score only 1 point higher. The lack of inclusion of this site means it is afforded less protection as an employment site. It is also difficult to understand why in the context of employment land need, the Council has been supportive of conversions or re-development of land on the Business Park for non-employment uses, notably student accommodation. Given this employment need the South Warwickshire authorities would like to understand the Council's stance on the future of this employment site, particularly in light of: • Strategic Policy JE1: Overall Economy and Employment Strategy o (part a) supporting fostering partnership working with the city's Universities to promote innovation o (part d) stating that there will be a presumption against the loss of employment uses o (part i) supporting the two universities and in doing so maximise the economic development associated with them.	the sites that were submitted and the rationale for discounting. Green Belt sites have been discounted on principle. The South Warwickshire authorities consider that the City Council should undertake a full assessment of these sites for their potential suitability as employment sites, including those submitted to the Council as potential housing sites. It would not be reasonable to expect Warwickshire authorities to potentially have to release land in the Green Belt to meet Coventry's unmet employment need if the City Council has, as a matter of principle, not explored its own	approach. It is also continuing to explore further supply potential. CCC continues to engage proactively with its partners in the FEMA to address the shortfall and an updated MoU and SoCGs where applicable are being prepared as set out in the DtC compliance paper.	

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						Paragraph 5.13 of the supporting text highlighting that sites with close links to the universities are desirable for research and development occupiers.	Green Belt land for strategic employment. Whilst the South Warwickshire authorities support Coventry's brownfield land first approach, it appears that 3 out of 4 call for sites have solely been for brownfield sites. We would question therefore whether all potential sites, including greenfield sites and Green Belt land, have been appropriately and robustly# considered ahead of requesting neighbouring authorities to meet unmet need from the City. In summary, the South Warwickshire authorities are		

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							happy to continue to engage in discussions regarding unmet need, however we would like more assurances relating to the robustness of the City Council's approach to fully exploring land within its own area. The South Warwickshire authorities may have land to accommodate some modest levels of additional employment, but we do not have sufficient infrastructure required to support such additional requirements and therefore it would be necessary for any exported need to be accompanied by sufficient resources to provide for these.		

Policy JE2 - Provision of Employment Land and Premises

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
NBBC (ID44)	JE2			N	Y	Nuneaton and Bedworth Borough Council (NBBC) has worked with Coventry City Council (CCC) on a range of cross boundary strategic matters in accordance with the Duty to Cooperate. The NBBC Borough Plan Review (BPR) is at an advanced stage of preparation with the Regulation 19 Examination in Public hearing undertaken in July to October 2024. Policy JE2: Provision of Employment Land and Premises identify sites to meet the OAN which results in a shortfall. NBBC considers that there is further work to be undertaken as employment land is sought beyond CCC administrative boundaries. CCC has undertaken a Housing and Economic Land Availability Assessment to identify a future supply of land. PPG sets out that the initial survey should take into account national policy and designations (Paragraph: 014 Reference ID: 3-014- 20190722). The HELAA (2024) details that sites considered unsuitable will	PPG requires that when constraints are identified there should be consideration to how they can be overcome. NBBC considers that a targeted Green Belt assessment of 'Land North of A45 and West of Brickhill Lane' should be undertaken. Particularly given the southern section of the site is in the Green Belt but contains a recently completed major road infrastructure project. The economic benefits of the site should also be assessed given the proximity to the	CCC considers that its technical update to the Green Belt Review is sufficient and should be considered in the round with other evidence. CCC continues to explore all opportunities for employment land provision, noting the comments regarding recycling of	No change to policy wording for JE2 considered necessary

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						include policy constraints that restrict development, such as Green Belt (para. 3.33). NBBC agrees that this is appropriate to consider policy constraints as part of the initial survey. The HELAA states that discounted sites that are not considered suitable will be clearly identified and not considered further through the local plan review process (para. 3.34). The HELAA sets out that CCC is committed to maximising development on previously developed brownfield sites (para. 3.73) therefore Green Belt sites are discarded. The omission of sites after the initial assessment contributes towards a shortfall in employment land supply. No further analysis is undertaken following the initial assessment. NBBC does not agree that the assessment process ends after the initial survey. Where constraints are identified PPG sets out the procedures for stage 2 of the assessment. In cases where constraints are identified the assessment will need to consider what action could be taken to overcome them. PPG uses examples of constraints to overcome include policies in the National Planning Policy Framework and the	nearby SUE and access to the strategic road network. Calculate an amount of employment land provision from recycled sites to meet the recycled need identified in the HEDNA.	land, and is engaging in discussions under the DtC with FEMA authorities in this regard. applicable. MoU and SoCGs being prepared with FEMA authorities see DtC compliance statement.	

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						adopted or emerging development plan (Paragraph: 021 Reference ID: 3-021-20190722). NBBC contends that NPPF Green Belt policy and the approach towards Green Belt in the emerging Local Plan are constraints to overcome. The HELAA identifies 'Land North of A45 and West of Brickhill Lane' the site area is 11.81 ha and would help towards the identified need but is discarded due to Green Belt designations. The site is located in Green Belt Area 1: Northwest Coventry. The HELAA do not Green Belt Study Technical Update consider that the southern section of the site includes a recently built slip road and roundabout which gives access from the A45 to the nearby H2:2 Eastern Green SUE. This is a significant strategic infrastructure project which will give access from the strategic highway. According to the Green Belt Technical Update Study July 2024 the traffic island and slip road are within the Green Belt. There is no assessment of the presence on the of significant highway infrastructure which potentially harms the openness of the Green Belt in this area. The economic benefits of an employment site with			

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						immediate access to the strategic highway and within close proximity to other allocated employment sites and supply of labour are similarly not assessed. The result is a higher unmet need figure which could be potentially reduced when the constraints are assessed. Policy JE2 seeks to protect certain employment sites from non-economic development. There are certain sectors of employment which do not require large units on strategic sites. The ELR notes that demand for small units is high. NBBC is supportive of protecting existing employment sites, particularly where they provide potential for small business units. NBBC believes that existing employment sites are a potential source of supply with CCC administrative boundary which have not been identified. The HELAA sets out that windfall rates are not applied to employment sites (para.3.53). However, the HEDNA is based on gross completions data, the HEDNA states, 'Using the gross completions does assume that past losses will to an extent continue and some of the			

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						forecast need may occur on recycled existing industrial premises.' It is appropriate to identify provision for a quantum of employment development expected to take place on existing employment sites over the plan period. Recycled sites will make provision of smaller units for businesses that do not require the allocation of large employment sites. Making provision for this is important to support investment and regeneration and should be identified in the supply.			
C&W Cham- ber of Com- merc- e (ID8)	JE2	N	N	N	Y	The draft Policy is fundamentally unsound because: (i) it fails to allocate sufficient land to meet the estimated requirements of 105 ha over the new plan period to 2041, (ii) it fails to adequately address in any detail how Coventry City proposes to deal with the identified "strategic "need of 136- 311ha of employment across the sub region(as identified in the C&W As argued in the response to DS1 the City's contention that it is unable to meet in full its needs is disputed.	As noted in our earlier response, remediation to address the deficiencies of this approach will require either modifications to oblige the Council to meet its full requirement within the City boundaries and/or a fundamental change to set out a clear and transparent partnership basis for distributing unmet	CCC continues to work with colleagues across the sub-region to address employment land provision. An updated MoU and SoCGs where	No change

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						The allocations set out in this Policy are sites originally allocated in the current adopted plan from 2017 and have been identified originally say 10 years ago through the early stages of this plan's preparation. There is no indication about effective timescales how the identified sites will come forward over the plan period. The sites listed do not represent a broad spectrum of employment land, as is suggested, and while some sites listed are in part delivered, the two major sites listed have no firm timescales attached to them in spite of being identified several years ago. These sites at Eastern Green and Baginton Fields still have uncertainty related to their timing and contribution to a "readily available" supply over the plan period to 2041. The plan fails to address or analyse the market sectors this policy may apply to. The policy indicates that a "<i>balanced portfolio of employment land supply offering a choice of sites will be maintained</i>" suggesting that the proposals are bringing forward such a portfolio. This is not supported by evidence detailing how each of the	employment needs to surrounding local authority areas. The latter route is more difficult because the development plans in the surrounding and adjoining local authorities are all at quite different stages in the plan process and do not share common timescales. This may be a case where the inspector /examiner must apply discretion as advised in the latest NPPF guidance.	applicable will be produced. Baginton Fields is an existing allocation and so does not need to be included as a Key Employment Site.	

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						listed sites is likely to contribute to particular market sectors. As noted, the policy also relies on “exporting” a residual 45ha Coventry’s growth yet provides no solid evidence of how this significant amount of land will be accommodated and implying that at some future date arrangements can be put in place to accommodate this employment land in surrounding local authority areas .There is no indication of timescales or indeed the potential locations for the distribution of the 45ha. This contributes to making the draft policy unsound. In addition, as noted above this overall lack of any detail or information undermines the way the Duty to Cooperate is approached in this draft plan. While the identification of Key Employment Sites in JE2(5) is welcomed it seems puzzling that Baginton Fields is not included in the list of these sites.			
Whitley Resid	JE2:4			N	Y	We do not consider that Land at Baginton Fields will enable the delivery of a sustainable	Policy JE2:4 Land at Baginton Fields To provide clarity and	CCC considers that the site at Baginton Fields	No change

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ents & Neigh- bour- hood Watch Assoc- iation (ID74)						development and therefore is not consistent with National Policy Strategic Policy JE2:4 Land at Baginton Fields allocated for Employment Development comprises of marshland/scrubland (Local Wildlife Site), Baginton Fields Playing Fields, the site of Baginton Fields School, Baginton Fields Local Nature Reserve (Local Wildlife Site), and King Henry VIII Sports Fields. The site area is 25 hectares. Land at Baginton Fields (Whitley East) is part of the West Midlands Investment Zone, (designated with effect from 8 April 2024, GOV.UK). However, not all of the allocation of Land at Baginton Fields,(Policy JE2:4) is included. Baginton Fields Local Nature Reserve and the site of Baginton Fields School are not included. We believe that the Local Plan Review proposed map and the policies map should be amended to reflect the West Midlands Investment Zone, Whitley East, which does not include	certainty to the extent of the allocation boundary intended for employment development we believe that the Local Plan Review proposed map and the policies map should be amended as follows: To reflect the West Midlands Investment Zone, Whitley East (Land at Baginton Fields), Baginton Fields Local Nature Reserve and school should be removed from JE2:4. To reflect the unsuitability of potential development on the marshland, identified by the Council as Flood Zone 2 (medium risk of flooding), this area should be removed from JE2:4.	is capable of delivering employment development and should remain an employment allocation. Details of any associated mitigation to the impact of development would be addressed as part of the planning application process.	

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						the Baginton Fields Local Nature Reserve and site of Baginton Fields School. This would provide clarity and certainty to the extent of the allocation boundary of Land at Baginton Fields, Strategic Policy JE2:4, intended for employment development. The National Planning Policy Framework (December 2023) paragraph 105 states: Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period. We believe that there is an opportunity through the Local Plan Review to designate specific areas of Land at Baginton Fields as Local Green Space. We consider that the designation of Local Green Space of Baginton Fields Local Nature Reserve, would give stronger protection to this area, similar to that of policy protection of Greenbelt. We also consider that Baginton Fields Local Nature Reserve should be outlined as a Local Nature Reserve on the	To reflect the recreational value to the community of Baginton Fields Playing Fields this area should be removed from JE2:4. National Planning Policy Framework (December 2023) paragraph 105 states: Local Green Spaces should only be designated when a plan is prepared or updated; and be capable of enduring beyond the end of the plan period. To give stronger protection similar to that of policy protection of Greenbelt, we request that the following areas in Policy JE2:4 Land at Baginton Fields, be designated Local Green Space.		

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						policies map in keeping with the Stonebridge Meadows Local Nature Reserve. Strategic Policy GB3: Local Green Space (1) states The city's Local Green Space boundaries are identified on the Policies Map. The Sowe Valley was formally designated Local Green Space through the 2017 Local Plan and is shown on the Policies Map. The Baginton Fields area of natural scrubland/marshland (Local Wildlife Site) that is part of the Sowe Valley corridor has not been included in the Local Green Space designation and is not shown on the Policies Map. In our view, to protect the natural scrubland/marshland area, wildlife and biodiversity of this part of the Sowe Valley corridor, it should also be included in the designation of Local Green Space and shown on the policies map as such. This would give consistency with other areas of the Sowe Valley designated Local Green Space and support the aspirations and goals in the Coventry Climate Change Strategy 2024-2030 particularly related to nature and green and blue spaces. This	Local Nature Reserve; Baginton Fields Playing Fields; and marshland		

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						increased protection would help to ensure that the river corridor's wildlife and biodiversity will not be disturbed by development, and would help to sustain ongoing natural flood defenses against the challenges of our changing weather patterns. The Baginton Fields area of natural scrubland/marshland (Local Wildlife Site) is identified by the Council as Flood Zone 2 (medium risk of flooding). We consider that given all the other developments that are being built along the Sowe Valley which could increase flood risk, any potential development on such land would not be sustainable. For this reason, we also consider that Baginton Fields marshland should not be included in the allocation for employment development(Policy JE2:4) and the Local Plan Review proposed map and the policies map should be amended accordingly. Climate Change Strategy 6.0 Nature Goal: Support nature recovery and create better access to green and blue space for wildlife to thrive and communities to enjoy. We believe knowledge and understanding of			

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						the impact of climate change and the importance that nature plays has grown over the years and we now have strategies such as the West Midlands Local Nature Recovery Strategy being developed, (Coventry is a supporting authority), Coventry CityCouncil (CCC) Green Space Strategy (2019 -2024), CCC Open Space SPD (2022), One Coventry Plan (2022-2030) and of course policies in the Local Plan. However, despite the ambitions in these documents, there are policies in the Local Plan intended to protect such areas as Local Wildlife Sites and Local Nature Reserves that conflict with each other. Policy GE3: Biodiversity, Geological, and Landscape Conservation 1. States: Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Policy GE2: Green Space 1. States: Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation ...Land at Baginton Fields			

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						is informal green space as defined in CCC Green Space Strategy and is very much of value for amenity, recreational, and community use. Notwithstanding that Land at Baginton Fields is informal green space, Land at Baginton Fields is a strategic land allocation for employment development and as such will not necessarily be afforded protection from development if the whole site remains part of the allocation. Last year a petition (193 people signed this ePetition) was presented to the Council requesting that Land at Baginton Fields be designated Local Green Space. This was due to local residents' concerns that Land at Baginton Fields had been allocated for employment development. It would appear that the very policies intended to protect such sites as Local Wildlife Sites and Local Nature Reserves are not effective if the land is a strategic allocation for development (Policy GE2). The community has already lost a large amount of informal green space that included Local Wildlife Sites			

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						to both commercial and housing developments; we don't want to lose more. Policy GE3: Biodiversity, Geological, and Landscape Conservation sets out the requirements for development proposals to lead to a minimum 10% Biodiversity Net Gain (BNG) either on site or where this is not possible, off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased. This gives three routes for a developer to achieve the minimum 10% BNG. To ensure Land at Baginton Fields is truly a sustainable development it must show a minimum 10% BNG which ideally should be delivered on site for continuing benefit to the local community. This could be achieved if areas such as the marshland (Local Wildlife Site), Local Nature Reserve and Baginton Playing Fields were effectively protected through policy, and designated Local Green Space.			

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						National Planning Policy Framework (NPPF), December 2023, paragraph 8 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): a) an economic objective; b) a social objective; and c) an environmental objective In our view, without effectively protecting Baginton Fields Playing Fields, the Local Nature Reserve and marshland , Land at Baginton Fields (Policy JE2:4) will not be able to deliver a sustainable development and will not accord with the NPPF's environmental objective, 'to protect and enhance our natural, built and historic environment; ...'. Strategic Policy DS4 (Part A) – General Masterplan Principles ix Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1). If a proposal is a			

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						strategic land allocation for development, it is unlikely that it will accord with Policy GE3. Strategic Policy DS4 (Part B) Whitley Specific Masterplan Principles, vii - An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road, but does not specify the size or extent of the buffer, which could be open to interpretation, and therefore lacks clarity. Strategic Policy DS4 (Part B) Whitley Specific Masterplan Principles ix – Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2. Policy GE2 Green Space (3) has allocated two sites to support the provision of new sports pitches for the proposed allocations at Policy H2:19 and Policy JE2:4. This would make provision for King Henry VIII sports fields, but does not appear to make provision for Baginton Playing Fields. Yet Baginton Fields Playing Fields is an important recreational amenity for the local community and valued publicly accessible green			

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						space that is within walking distance of local residents, supporting active living. Baginton Fields Playing Fields also provides important connectivity between Whitley Grove Woods and Baginton Fields Local Nature Reserve. We consider that Baginton Playing Fields should be designated Local Green Space because of its recreational value to the community, in accordance with National Planning Policy Framework (December 2023), paragraph 106. We also consider that Baginton Playing Fields should not be included in the allocation for employment development (Policy JE2:4) and the Local Plan Review proposed map and the policies map should be amended accordingly. Strategic Policy DS3: Sustainable Development Policy states ‘... to secure development that improves the economic, social and environmental conditions in the area...’ Allocating Land at Baginton Fields for employment development does not appear to accord with improving the environmental conditions in the area.			

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						The value of the Baginton Fields Playing Fields, Local Nature Reserve and the marshland area along the Sowe Valley corridor cannot be over-estimated in terms of its amenity value for local residents as a means of encouraging walking and improving mental health, along with the natural habitats it offers to local wildlife. There is much made of creating wildlife corridors that enable animals and birds to move between green spaces and this area along with Stonebridge Meadows and the Sherbourne valley offers a natural corridor that can enhance and support increased biodiversity as the surrounding area is inevitably developed as part of the West Midlands Investment Zone. Once green space is lost it can never be regained and with increasing temperature, the potential to flood and the urban heat island effect, the value of green space as a mitigating factor has to be taken into consideration in terms of its own economic, social and environmental value going forward.			

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						Preserving the areas of Land at Baginton Fields mentioned, will also demonstrate the Council's commitment to its Climate Change Strategy and the growing importance of green and blue infrastructure in the city. As stated in the National Planning Policy Framework (December 2023, paragraph 7) At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs (Resolution 42/187 of the United Nations General Assembly)			
Sport Eng- land (ID55)	JE2: 4	Y	Y	N	N	Sport England note the continuation of the employment land allocation JE2:4 Land at Baginton Fields and South East of Whitley Business Park and housing allocation H2:19 Land at Mitchell Avenue, both sites include playing field land which could be lost as a result of the development of the sites. It is also noted that Policy GE2 Green Space allocates two sites for the provision of new sports pitches, to support the allocation of JE2:4 and H2:19.	Sport England consider all site allocations which would result in the loss of playing field land (and ancillary provision) should be subject to Policy GE2 to ensure compliance with the requirements of NPPF paragraph 104.	The allocations and associated policy wording were assessed and found sound through the process which led to the	Reference alternative provision in GE2 to ensure it is consistent with H2:19.

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						Sport England are unable to identify the potential replacement playing field sites highlighted in Policy GE2, with the site not appearing to be displayed within the proposal map. As such, Sport England are unable to make an assessment as to whether the two sites would be at least equivalent in quantity and quality to that proposed to be lost at site allocations JE2:4 and H2:19, in line with NPPF paragraph 104b and Policy GE2. Linked to this if there is a loss of provision playing field land, no assessment has been submitted to demonstrate that the playing field land (and ancillary provision) is surplus to requirement in accordance with the abovementioned policies. As part of this a local assessment of need should be provided having regard to the Council's Playing Pitch and Outdoor Sports Strategy 2023. As such it is considered that the allocation of JE2:3 and H2:19 is not justified as it has not been demonstrated how the allocations meet the requirements of NPPF paragraph 104. Consequently, there is no justified	Sport England therefore consider the below text (strikethrough) should be removed from Policy GE2. Policy GE2 1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless ~~specifically identified as part of a strategic land use allocation,~~ or it can be demonstrated that..... More specifically, it should be demonstrated that Land at Charter Avenue and Land East of Coundon Wedge Road, proposed replacement sites for allocations H2:19	adoption of the 2017 Local Plan. GE2 refers to replacement sites at Charter Avenue or Coundon Wedge Road. The adopted allocation for Baginton Fields (JE2:4) links to GE2. However adopted policy H2:19 also links to GE2 but refers to replacement playing field sites at Charter Avenue, Coundon Wedge Road 'or	

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						reason as why the sites should not be subject to all of the policy requirements set out in Policy GE2.	and JE2:4, meet the requirements of NPPF paragraph 104b (and Sport England Exception Policy E4). It should be noted that Land at Charter Avenue appears to be an existing playing field site, and it has not been demonstrated that it is not required to meet any shortfalls in playing field provision independent of being mitigation for the loss of proposed site allocation H2:19. If the above, is not demonstrated Sport England consider that GE2 point 4 is deleted to ensure conformity with NPPF paragraph 104:	an appropriate alternative site within the local area as part of this development (in accordance with policy GE2)'. For consistency it would be appropriate to include reference to 'alternative provision' in GE2 to ensure sufficient flexibility. The reviewed plan includes a hook to ensure that the latest evidence is	

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							~~To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new sports pitches: Land at Charter Avenue (former Alderman Harris School site). Land east of Coundon Wedge Road.~~	taken into account to inform planning applications	
Stoford Develop- ments (ID60)	JE2	N	Y	N	Y	Objections to Policy DS1 and JE2 1.1 We object to criteria 1.b and 1.c. of Policy DS1 in respect of employment land provision. Criterion 1.b. plans for a minimum of 60 ha of employment land to meet local needs within the city's administrative boundary between 2021 - 2041. This 60ha comprises: • completions between 2021 – 2024 (25.4ha), • commitments (6.2ha) and • allocations (28.6ha) (not including Baginton Fields).	1. Correct the error in recorded completions set out in the Plan. The completions between 1st April 2021 and 31st March 2024 are cited as 25.4ha. However, the completions data provided in the Council's annual monitoring reports for the last 3 years (2021/22, 2022/23 and 2023/24) total 21.02ha	The evidence is considered robust and data was supplied to the consultants using the figures available at the time and utilised in line with their methodology.	No change

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						1.2 Criterion 1.c. plans for 25ha to be provided at Baginton Fields, to contribute to sub regional need in Coventry and Warwickshire. 1.3 None of the allocations made within the revised Local Plan are new allocations. All of the allocations were previously made for a Plan period that extended to 2031. The revised Plan extends to 2041, with no new allocations being proposed, despite a new evidence base (Coventry and Warwickshire HEDNA 2022, WESESS 2024, and the CW Alignment Paper 2024 all confirming an increased need for employment land at Coventry (and Warwickshire). i. Are the recorded completions accurate? The completions between 1st April 2021 and 31st March 2024 are cited as 25.4ha. However, the completions data provided in the Council's annual monitoring reports for the last 3 years (2021/22, 2022/23 and 2023/24) total 21.02ha (accounting for losses). Thus, a difference of 4.38ha in completions. We request that this error be rectified and the supply / residual need figure be updated accordingly.	(accounting for losses). Thus, a difference of 4.38ha in completions. The Council's B2/B8 local employment land supply totals 55.82ha and not the figure of 60.2ha. 2. Retain Baginton Fields (25ha) as a local needs. Accordingly, criterion 1.b. of Policy DS1: Overall Development Needs should be amended to plan for a minimum of 85ha of employment land to meet local needs within the city's administrative boundary (i.e. the 60ha currently referenced within DS1, plus the 25ha arising from Baginton Fields). The need for criterion c would consequently fall away.		

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						ii. What sites comprise the committed supply? We also query the committed supply figure of 6.2ha in Table 5.1. it is unclear which sites comprise the commitments. iii. Implications of the supply on the Plan Period 1.4 The Plan refers to a local employment land requirement (use classes B2 and B8) of 105ha between 2021 and 2041, which equates to a need of 5.25ha per annum. Table 5.1 of the Plan provides the class B2 and B8 local employment land (B2 and B8) supply components for Coventry. When the correct completions figure (using AMR data) is counted within the supply (i.e. supply reduced by 4.38ha as set out above), the Council's B2/B8 local employment land supply totals 55.82ha and not the figure of 60.2ha in Table 5.1 of the Plan. This equates to a supply of just 10.6 years from 2021 and means that there will be a complete absence in supply for the last years of the plan period (2031-2041).	3. Re-examine the committed supply figure of 6.2ha in Table 5.1 of the Plan. It is unclear which sites comprise the commitments. 4. Continue Duty to Co-operate discussions with Rugby Borough Council to assist in meeting the local employment shortfall and progress a Memorandum of Understanding. 5. Recognise and rectify the errors in the strategic employment needs evidence base (namely the WMSESS 2024 and subsequent Alignment Paper 2024) and plan for higher strategic employment needs in Opportunity Area 7 via the		

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						1.5 For this reason, we object to the reallocation of Baginton Fields as a sub-regional strategic employment site. With there being an absence of supply from 2031 onwards, it is unclear why the Local Plan proposes to utilise Baginton Fields – a site that is sustainably located within the City’s administrative area and close to residential areas to facilitate local job opportunities – but is being proposed now to serve strategic employment needs, and not contribute towards the 105ha requirement of Coventry itself. 1.6 The decision to not allocate Baginton Fields towards meeting local needs, means that the Local Plan supply (stated as being 60.2ha) (Table 5.1) is some 45ha short of the City’s requirement. If Baginton Fields were retained as a site for local employment purposes this would add 25ha of land to the supply, decrease the shortfall in supply to 20ha (from 45ha) and add a further 4.7 years to the supply (to a total of 15.3 years). This is significant. Given the origin of need, the remaining shortfall of 20ha should then be met on new allocated within the City and / or, on sites closest to Coventry within adjoining authorities.	Duty to Co-operate with Rugby Borough Council.		

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						Historically, the City Council have worked effectively with their neighbours and non-strategic and strategic, unmet needs from the City have been met close to the City within the Local Authority areas of Rugby, Warwick and Nuneaton and Bedworth at Ansty Park, Prologis Park Ryton, Prologis Park Keresley and the Coventry airport site. 1.7 Aside from its scale at 25ha, there does not appear to be good reason for the reassignment of Baginton Fields, from a local needs site to a sub-regional strategic employment site. This site is in the heart of Coventry, within walking distance of potential labour and occupies a school which is currently seeking permission to extend (PL/2025/0000308/FUL). There are also restrictive planning policy requirements on the site including the need to safeguard the Sowe Valley River corridor and Stonebridge Meadows Local Nature Reserve, and compensatory provision for the King Henry VIII School playing fields. Given the need to work around the onsite school and the nature reserve, the configuration of the residual land is considered more appropriate for smaller units to meet local			

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						employment needs and is unlikely to support the needs of strategic site occupiers. Strategic Site Requirements 1.8 The West Midlands Strategic Employment Sites Study 2024 (WMSESS) identifies a need for 1 or 2 strategic employment sites of c.25ha (for E(g)/B2 uses) or c.50ha (for B8/mixed uses) in Opportunity Area 7: M6 / A45 / A46 / M45 Coventry & Rugby. This Opportunity Area covers Coventry City and much of Rugby Borough. It extends marginally into Nuneaton and Bedworth Borough and Warwick District. 1.9 The Coventry and Warwickshire Alignment Paper 2024 advises that the residual strategic site need for Area 7 is up to 84ha, and this is across the area of the M6/A45/A46/M45 Coventry and Rugby. The requirements will be met through the preparation of Local Plans. 1.10 In terms of Local Plan progress, Nuneaton and Bedworth are at examination with their Local Plan and the Inspector has stated in his initial findings			

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						(reported in the Post Hearing Letter dated 14th November 2024) that the Plan may be capable of being found sound via main modifications. Since this Plan is likely to be found sound and be adopted in mid-late 2025, Nuneaton and Bedworth are at least 5 years away from being able to assist with strategic needs or now assist in any shortfall (i.e. the 45ha arising from Coventry). 1.11 Warwick District and Stratford-on-Avon District are currently consulting on their Preferred Options (Regulation 18) Joint Local Plan which proposes site options to meet strategic employment needs identified in the WMSESS 2024. Opportunity Area 8 identified in the WMSESS extends exclusively across Warwick District and Stratford on Avon District and it is most appropriate for the South Warwickshire Plan to respond to and seek to accommodate needs identified in this area. 1.12 Rugby Borough is considered most able to assist in meeting the strategic employment needs of Opportunity Area 7. The Borough sits squarely within			

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						the Opportunity Area and its Local Plan is yet to reach Preferred Options (Regulation 18). Thus, Rugby is located appropriately to respond to the sub-regional needs of Opportunity Area 7 and at an appropriate stage of plan making to meaningfully assist in meeting these needs, and any unmet local employment need. 1.13 In a report prepared for Rugby's Cabinet meeting on 4th March 2025, Rugby Council acknowledge that "Coventry City Council does not have land to allocate further large employment sites... Therefore, it is proposed that the 84ha/294,000m2 required in opportunity area 7 to 2045 should be accommodated in Rugby Borough." 1.14 The residual strategic sites need figure of 84ha is calculated after commitments (in Appendix 3 of the WMSESS and Appendix 1 of the Coventry and Warwickshire Alignment Paper) are deducted. This includes 25ha at Baginton Fields. However, for the reasons above, we believe this site is far better suited to meet local needs and should remain as such in the			

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						emerging Plan and thus not be deducted as a component of strategic supply. 1.15 Importantly, if Baginton Fields is reassigned to meet local needs, (for the reasons we have outlined above) its contribution to meeting strategic needs should be omitted and the residual need for Opportunity Area 7 increased (from 84ha). For Opportunity Area 7 this means that the residual 'strategic sites' need should be increased from 84ha to 109ha (+25ha). As Rugby Borough Council acknowledge, the City does not have large employment sites available to meet strategic needs, and we consider therefore, that this should be met in Rugby Borough. 1.16 For the reasons above we recommend that Baginton Fields (25ha) be included as a local needs site and that criterion 1.b. of Policy DS1: Overall Development Needs plan for a minimum of 85ha of employment land to meet local needs within the city's administrative boundary (i.e. the 60ha currently referenced within DS1, plus the 25ha arising from			

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						Baginton Fields). The need for criterion c would consequently fall away. 1.17 Notwithstanding this change, we note that a shortfall in local employment land of 20ha would remain (i.e. the requirement is 105ha and the updated supply would be 85ha). As above, Rugby Borough is best placed to assist in meeting this unmet local need (in addition to Strategic needs). 1.18 The Council's Duty to Cooperate Statement states that "Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it is unable to accommodate a 45 hectare shortfall... but this currently remains an outstanding issue that has not yet been resolved. In part this is because most partner authorities are at earlier stages of plan preparation". Having regard to Rugby's Cabinet Paper for its meeting on the 4th of March we note that there is not a single mention of Rugby assisting Coventry's unmet local needs. Therefore, whilst we support the intentions of criterion 3 of Policy DS1, to date, this unmet need remains			

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						unresolved, and Rugby Council do not appear to be taking any share of this. A Memorandum of Understanding between Coventry and Rugby must be progressed to progress this matter. 1.19 We support criterion 4 of Policy DS1 which allows for an early review of the Plan (either wholly or partially) if required, in certain circumstances, including, through the Duty to Co-operate, where the unmet employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities. The Strategic Sites Need is higher than 84ha for Opportunity Area 7 1.20 Our representations thus far have been based on the 'claimed' 84ha residual strategic site need, referenced in the revised Local Plan and set out in within the Alignment Paper 2024. 1.21 Stoford, together with our expert consultants, Marrons, consider there are serious flaws in the WMSESS 2024 and subsequent Alignment Paper 2024 that mean that the strategic employment needs for			

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						Coventry and Warwickshire are significantly higher. Our reasoning for this is set out succinctly in the appended report, commissioned by Stoford, and prepared by Marrons Economics which provides a technical Review of WMSESS 2024 and the Alignment Paper 2024. 1.22 In short, Marron's assessment demonstrates that the residual strategic sites need across Coventry and Warwickshire should be increased by a further +448.7ha and 528.7ha simply to account for errors in the calculation of need. 1.23 Marron's also note that the Alignment Paper 2024 identifies a need for strategic sites across Coventry and Warwickshire that align relatively closely with the HEDNA figure from 2022 – and the HEDNA also forms part of the Local Plan evidence base. 1.24 The Alignment Paper 2024 calculates a residual strategic sites need from a gross figure, by deducting sites with planning permission. Whilst this is acceptable in principle, the Alignment Paper 2024			

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						includes sites within this supply of land, that artificially inflate it and should not be counted as commitments/supply. 1.25 For example, WMSESS deducts from the overall strategic need, two large sites within Coventry and Warwickshire that are for a specific occupier/use. These being the JLR reserved site (adopted Core Strategy) in Stratford-on-Avon (100ha) and Battery Manufacturing facility at Coventry Airport (124.7ha). These sites will not assist in meeting the WMSESS modelled need for general employment uses and should not have been taken off the overall strategic need. 1.26 The Alignment Paper 2024 also deducts 64ha from the overall strategic site need for WMSESS Opportunity Area 7 (Coventry and Rugby). This is because of planning permission having been granted for the site known as Padge Hall, even though this site falls outside of the identified opportunity area (7) for Coventry and Rugby. Moreover, this site is intended to meet the needs of a specific occupier relocating from			

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						Hinckley (as stated within the planning application material), and again, the occupiers' need will not have been factored into the WEMSESS modelling. It is incorrect for the Alignment Paper to therefore deduct 64ha from the Opportunity Area 7 overall needs as a consequence of this planning permission. 1.27 Full details of our concerns and the need for higher strategic growth for Coventry and Warwickshire is contained in Marron's Technical Review of the WMSESS and Coventry and Warwickshire HEDNA – WMSESS Alignment Paper [Officer comment: appended – see this in full representation].			
Oxalis on behal- f of Hallam Land (ID46)	JE2	N	N	N	Y	Section 5 of the CCCLP sets out the Council's approach to the overall economic and employment strategy. It details that the Council will work positively and proactively with the business community in the city, inward investors, the City's two Universities, key public sector employers, partners, and neighbouring local authorities to support sustainable economic growth and job creation. Draft policy JE2 is considered unsound in accordance with Paragraph 86 of the NPPF	Policy JE2 should be revised to allocate sufficient and appropriate land to meet the employment land requirements identified in the local plan evidence base (which we do not entirely accept). Alternatively, a statement of common	The evidence base is considered to be robust. The DtC Compliance paper sets out progress on the MoU and SoCGs	No change

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						(as set out in the previous section), as it does not provide employment land to meet the identified employment needs. As set out in section 5 of the CCLP, employment policies are based on the following documents, that form part of the evidence base: • Housing and Economic Development Needs Assessment (HEDNA) (2022) • Employment Land Review (ELR) (2024) and ELR Office Market Addendum(2024) • Housing and Employment Land Availability Assessment (HELAA) (2024) • West Midlands Strategic Employment Sites Study (WMSESS) and Coventry and Warwickshire Alignment Report (2024) • Coventry City Council Economic Development Strategy 2022-2027 • Local Plan Review Employment Background Paper (2024) The Iceni 'Housing and Economic Development Needs Assessment 2022' made a key conclusion that there is a need to commission a further study to specifically consider the needs for strategic logistics. The subsequent 'West Midlands Strategic Employment	ground or memorandum of understanding should be agreed by Duty to cooperate partners (or made publicly available if one has been prepared) in order to secure delivery of the employment land needs. Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025.		

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						Sites Study 2023/24' published August 2024, provides advice on site criteria, and although this is in relation to strategic sites, it identifies the A45 corridor (Area 7) as having high demand and resulting takeup, and 'rents achieved are some of the highest in the Midlands market'. Further, it explains that 'Coventry has relatively high levels of unemployment', which only further highlights the importance of delivering adequate employment land supply. Evidence which forms part of these representations highlights that the overall need for employment land in Coventry City is greater than that assumed by the CCC evidence base. Therefore, in reality the shortfall between requirement and proposed new land supply is also more significant than the 45ha, in both quantitative and qualitative terms, than that identified by the CCCLP and its supporting evidence base. Savills have prepared a report (Industrial and Logistics (I&L) Needs Assessment February 2025) which reviews and assesses the robustness of the employment evidence base. It draws conclusions on employment land requirements based on Savills' own assessment of needs that considers historic under delivery of sites,			

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						as well as forecasted future growth. Please find the report enclosed. The Savills report critiques the evidence base for employment land needs in support of the Local Plan comprising the 2022 HEDNA, 2024 WMSESSS, and West Midlands Strategic Employment Sites Study (WMSESS) and Coventry and Warwickshire Alignment Report (2024). It assesses that the identified employment land requirements are formed by an analysis of trend-based data, which does not consider market indicators. Recent market trends indicate through the high absorption rates, low stock availability, and increased rental values that the market has historically (and currently) been An up to date, proactive and forward-looking evidence base is essential to inform the new local plan. Retrospective, or backward-looking past trend-based evidence will only serve to perpetuate historic missed opportunities to fully plan for the needs of the City's economy. While the HEDNA has considered a number of scenarios and sources of evidence of need and demand, it is important to note that the analysis undertaken is essentially trend based. Given the			

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						historic under-supply of large-scale sites across the wider region and a relative lack of allocations of such sites through past Local Plans in the West Midlands (and elsewhere), any trend-based projection of need and demand will inevitably be an under-estimation. In addition to the above, supply needs to be considered to meet the replacement supply demand of existing businesses within Coventry who seek new premises better suited to their evolving requirements, and to allow modern modes of operation. This need is recognised in the evidence base, and the availability of sufficient land is critical if this natural ‘churn’ in the market is able to take place. New replacement employment premises – redeveloped existing sites or refurbished buildings – can make a notable contribution to improving the quality of existing supply by delivering modern units with, for example, greater energy efficiency or renewable energy opportunities which helps meet the ESG or sustainability aims of many occupiers which are not currently or easily met in older, existing employment buildings.			

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						constrained by supply, therefore resulting in inhibited take-up. The trend-based assessment in the Council's evidence base, therefore, does not consider these market conditions and in turn underestimates the actual employment land need requirements. This does not accord with NPPF Paragraph 32 (Dec 2023) which specifically requires policies to "take into account relevant market signals". The Savills report uses their own assessment methodology which considers market signals in accordance with NPPF paragraph 32, which is becoming a well-recognised method of accurately identifying employment land requirements. In summary, this assessment concludes that the employment land requirements across the FEMA are underestimated, as is Coventry's share of the non-strategic employment need across the FEMA. Accepting the Council's identified supply of non-strategic sites at 67ha (some sites of which are identified to be constrained by Savills), Savills conclude that the unmet need is 72 - 86ha, which is significantly greater than the 45ha recognised within the CCCLP.			

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						Whilst the CCCLP acknowledges the unmet need in relation to non-strategic employment need, it goes little way to discussing the requirements of employment land for strategic sites of 25ha or more, or 9,000sqm+, a requirement set out in the WMSESS 2024. The WMSESS 2024 draws conclusions based on areas of opportunity, and 'Area 7' falls within the administrative boundaries of Rugby Borough and Coventry City. Responsibility therefore falls on these authorities to allocate sites to meet this identified unmet need of 9 – 84ha as set out in the 2024 Alignment Paper. Work done by Savills for HL challenges this need figure, suggesting the need for strategic sites is higher. The unmet need for strategic sites is in addition to the strategic site allocation set out in the CCCLP JE2:4 for 25ha, which is already identified in the WMSESS 2024 as a pipeline supply site and therefore does not meet that shortfall set out above. There is no clear evidence published between CCC and Rugby Borough that sets out how this unmet (strategic or non-strategic) need will be delivered between the authorities, and CCC should therefore make information publicly available as to how the			

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						Duty to Cooperate Partners are working together to meet this need. In general, the recognised unmet employment land need for non-strategic sites and failure of CCC to fully assess and set out the approach to meeting strategic employment land requirements, demonstrates a negative approach to employment development. This in turn undermines CCC's approach to the local economy, and contradicts the approach set out in 'The Vision' section of building a strong, responsive, and competitive economy. Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025. Officer comment: See full representation for further information			
Savills of behalf of Bellway Home	JE2	N	Y	N	Y	Policy JE2: Provision of Employment Land and Premises 4.29. This policy refers to 52ha of land being allocated for employment development. Policy DS1 confirms that 60ha would be allocated, and as such the numbers in this draft policy should be updated.	Respondent comment: 'Please refer to representation'.	For clarification, the 60ha figure is supply which comes from a range of sources as set out in the alignment	No change.

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es and Mert on College (ID52)								report, whereas 52ha is allocations only.	
Stantec on behalf of HGIT Central Coventry Ltd (ID57)	JE2			N	Y	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	Respondent comment: 'Please refer to representation'.	CCC considers that part C of Policy JE1 and Paragraph 5.13 addresses these points. Central City is an established employment site and so has not been allocated but it is acknowledged that it should potentially be	No change

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						employment use where their quality of space is considered to be poor and preventing the ambitions of the Plan being realised. 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.		included as an important element of employment supply given that the council is considering further supply through recycling / upgrading of sites in discussions with its partners in the FEMA, and these comments are noted and welcomed in this regard.	

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						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. Officer comment: Please refer to full representation for full report and site location plan			
Stride Treglown on behalf of Cove- ntry unive- rsity (ID61)	JE2	Y	Y	Y	Y	Opportunities exist to release University Group controlled land assets for alternative uses at the periphery of the “academic” estate. Such opportunities could contribute towards wider Council redevelopment ambitions in the area, including commercial uses such as a hotel, residential, small scale retail and partnership building(s) which could offer wider public sector and quasi-community uses. At this time, the University Group is unable to define a particular proposal sufficient to submit under a call for sites request, however will maintain a dialogue with the Council over its proposals in this, and other areas,	This representation suggests background text to offer clarity as to the development ambition of the University Group in bringing forward mixed use development proposals within the City Centre (Civic Centre site) over the life of the Local Plan.	Comments noted.	No change

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						as appropriate and aligned with the University Group's Adopted Estate Strategy.			
Coventry and Warwickshire Growth Hub (ID9)	JE2				Y	The draft Policy is unsound because it fails to allocate sufficient land to meet the estimated requirements of 105 ha over the new plan period to 2041. Also it fails to adequately address in any detail how Coventry City proposes to deal the identified "strategic" need of 136-311ha of employment across the sub region. This is a very broad range of strategic employment provision and needs to be refined so that Coventry's role in accommodating this growth is clarified. As the GH has argued above, the Growth Hub disputes the City Council's contention that it is unable to meet in full its needs. Taken together, these proposals threaten the long-term viability of the local economy. The policy indicates that a <i>"balanced portfolio of employment land supply offering a choice of sites will be maintained"</i> suggesting that the proposals are bringing forward a portfolio offering these characteristics. This is not supported by the evidence.	As noted in The Growth Hubs response above, remediation to address the deficiencies of this approach will require either modifications to oblige the Council to meet its full requirement within the City boundaries and/or a fundamental change to set out a clear and transparent partnership basis for distributing unmet employment needs to surrounding local authority areas. The latter route is more difficult because the development plans in the surrounding and adjoining local authorities are all at quite different stages in the	CCC continues to explore all reasonable opportunities for employment land provision, including on-going and proactive discussions with colleagues across the FEMA. Five calls for sites were undertaken including a bespoke employment version. The council is undertaking	No change to the wording of JE2

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						The allocations set out in this Policy are sites originally allocated in the current adopted plan from 2017. There is no indication about effective timescales how the identified sites will come forward over the plan period. The sites listed do not seem to represent a broad spectrum of employment land, as is suggested. The sites at Eastern Green and Bagington Fields still have uncertainty related to their timing and contribution to a “readily available” supply over the plan period to 2041. It seems likely that both of these larger sites will continue to be delayed in coming forward and that they will not provide a wide enough range of land and premises to meet all requirements across the plan period. As noted, the draft policy also relies on “exporting” a residual 45ha Coventry’s growth yet provides no solid evidence of how this significant amount of land will be accommodated and implying that at some future date arrangements can be put in place to accommodate this employment land in surrounding local authority areas. There is no indication of timescales or indeed the potential locations for the distribution of the 45ha.	plan process and do not share common timescales.	additional work to explore the potential for including the potential for recycled / upgraded sites within its supply and this is being discussed with the FEMA.	

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						This contributes to making the draft policy unsound. In addition, as noted above (ref.) this overall lack of any detail or information undermines the way the Duty to Cooperate is approached in this draft plan .			

Policy JE3 - Non-Employment Uses on Employment Land

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
C&W Chamber of Commerce (ID8)	JE3 and para 5.22 onwards	Y	Y	N	Y	The Chamber of Commerce fully supports the aim of this policy to retain as much employment land and premises. We believe the policy should be strengthened by adding into the draft policy itself some of the provisions set out in the supporting text (for example 5.24) and lengthening the timescales suggested in the text for marketing of the property as an employment site. The Chamber sets out more details in the next section of this form below.	The Chamber of Commerce believes that the Policy JE3 can be strengthened by incorporating into the policy wording provisions based around the criteria below: -We believe the minimum marketing period should normally be 12 months, unless special circumstances can be demonstrated	CCC notes the suggested period of a minimum of 12 months marketing, especially given the constrained local supply of employment land in the city. However, CCC is also mindful of the need to ensure that the right land in the right place is developed and occupied and	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							that dictate this should be varied. -The Policy should specify that marketing of the site should take place by involving in the change of use process, at least one local agent with demonstrable connections to property work and operations in the Coventry market. -There should be a requirement to identify that the site has been marketed at a realistic price considering the site	any unnecessary constraints to that recycling of land and property is done in a proportionate way and that the market determines what land is suitable based on evolving market conditions, which can change over a few months. Whilst the council acknowledges that agents based in the	

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							characteristics, previous uses and its condition.	Coventry area may have more immediate and detailed knowledge of the property market, we question the term Local in relation to any geographical area and do not think that such a requirement is proportionate to a Local Plan Review or associated policy. Given the availability of information across a range of media,	

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
								industry specific data and national, regional and local transactions data, we consider that this criteria would not be proportionate or reasonable.	
Coventry and Warwickshire Growth Hub (ID9)	JE3				Y	The CW Growth Hub strongly supports the aim of this policy to retain as much employment land and premises. It is important to retain a range of properties that cater for all commercial sectors and which offer a range of prices and rents. The processes of market “churn’ and operation stem from having a range of land and premises that accommodate a variety of business types at a range of market prices and rents. It is important that the existing	The policy should be strengthened by adding into the draft policy itself some of the provisions set out in the supporting text (for example 5.24) and lengthening the timescales	CCC notes the suggested period of a minimum of 12 months marketing, especially given the constrained local supply of employment land in the city.	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						stock of land and premises are protected by policies that make it a challenging process to change properties to non-employment uses.	suggested in the text for marketing of the property as an employment site. For example, the minimum marketing period should be extended to at least 12 months. In addition, there should be a requirement in the policy wording to identify that the site has been marketed at a realistic price considering the site characteristics, its previous uses, and its condition. The Policy should also	However, CCC is also mindful of the need to ensure that the right land in the right place is developed and occupied and any unnecessary constraints to that recycling of land and property is done in a proportionate way and that the market determines what land is suitable based on evolving market conditions,	

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							include a requirement that the marketing process should be undertaken by agents with demonstrable track record and experience of working in the Coventry local market.	which can change over a few months. Whilst we acknowledge that agents based in the Coventry area may have more immediate and detailed knowledge of the property market, we question the term Local in relation to any geographical area and do not think that such a requirement is proportionate to a Local Plan	

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appeal at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
								Review or associated policy. Given the availability of information across a range of media, industry specific data and national, regional and local transactions data, we consider that this criteria would not be proportionate or reasonable.	

Policy JE5 - Industrial and Storage / Distribution Development

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
C&W Chamber of Commerce (ID8)	JE5	N	Y	N	Y	The policy relies on an understanding that the sites identified are sufficiently flexible to meet a wide spectrum of potential future needs. We are unsure if this exercise has been undertaken? It may be too restrictive to accommodate all growth scenarios and types of future employment needs over the whole plan period. While the aims of this policy are recognised it is not made clear in the wording whether the aim is to consider “local employment” needs or whether this is an overarching policy that could apply to all industrial and storage /distribution including “strategic needs”. The latter would be particularly relevant for the undistributed element of industrial or warehousing type uses. If these uses are not located at the sites listed under Policy JE2 then the criteria simply seems to apply standard development management principles to determining location and could be seen as unnecessary.		The wording is that carried over from the adopted local plan is the same in relation to storage and distribution with the addition at point 4 regarding HGV parking and overnight facilities with EV charging. It is not considered necessary to	Minor change to complete the missing text at new point 4 ‘In addition to the above, where B8 uses will include HGV parking and overnight facilities, electric vehicle charging and consolidation facilities will be provided’

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								state whether the B8 is for local or strategic purposes as the application of policy will depend on the context.	
Stoford Developments (ID60)	JE5	N	Y	N	Y	We support Policy JE5: Industrial and Storage / Distribution Development which supports employment proposals on windfall sites subject to criterion 2, 3 and 4. We appreciate that windfall sites can provide for unplanned needs that respond to occupier demand. However, this does not excuse the absence of a Local Plan making provision for meeting its employment land requirement, not having regard to market signals, a dwindling land supply and the evidence base underpinning the Plan. Windfall policies should be for unforeseen needs only, and not a means of addressing forecast/projected needs.		The aim of the policy is to enable flexibility in the delivery of sites be they allocated or windfall. Part 2 of the policy states that sites not allocated under Policy JE2, will be permitted provided that they satisfy a	No change

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								series of criteria. Therefore, the aim of the policy is to facilitate the delivery both allocated and non-allocated sites. Therefore, the policy can respond quickly to demand within the market, whilst still maintaining the delivery of allocated sites, should they come forward.	
Joscelyne	JE5 & para	N	N	N	N	B8 tends to be located close to the administrative boundary of the City, near the strategic road network (SRN) particularly at junctions such as the M6 J2 and M6 J3 and along public	Include references to the WMSESS threshold (25ha)	Given the WMSESS is a high level	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Bigham (ID23)	5.27 - 5.32					transport routes associated with deprived areas (where levels of car ownership are lower). Currently, these policies do not address the cumulative cross-boundary effects on traffic levels and air quality within areas such as Longford and Foleshill. The effects of B8 sites located within other administrative areas also need to be considered. For example, strategic sites surrounding M6 J3 and further along the A444 at the Griff Island Nuneaton. There are West Midlands Combined Authority (WMCA) funded infrastructure projects in the pipeline such as the Keresley Link Road and the Coventry North Package (M6 J3 improvements) which are being led by CCC. Yet, these do not appear to be referenced. Should the delivery of B8 be timed to link with these projects? What happens to traffic levels along the B4113 and A444 if these projects are delayed, cut back or cancelled? Yet, the following is stated elsewhere within the Regulation 19 Proposed Submission, '12.5 Public health is also a key consideration. A citywide Air Quality Management Area (AQMA) was declared in Coventry in 2009 due to significantly high levels of air quality emissions. Research demonstrates	and technical strategic site criteria. Use specific and measurable requirements rather than the phrase 'would not result in significant harm' which is difficult to define and open to interpretation.	strategic document, it is not considered necessary to include specific details in this policy.	

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						that emissions from road transport are the principal source of elevated concentrations of Nitrogen Dioxide (NO₂) which causes poor air quality. The main transport corridors to the North and North East of Coventry (linked to the M6) are identified as being most likely to exceed the NO₂ standard.' It is important that policies are cross-referenced to ensure that there is a consistent approach and that delivery on key issues, such as air quality, is not undermined. What measures will be put into place to prevent increases in HGV movements along the B4113 and its side roads such as Windmill Road? How are school walk routes being considered in terms of air quality and road safety? Is there a priority route network for HGVs within Coventry and Warwickshire? Should more weight limit restrictions be introduced? Should APNR be used to enforce weight limit restrictions and prevent issues such as bridge strikes? A recent NBBC Strategic Transport Assessment referred to 'peak spreading' in response to congestion,			

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						'3.60 The purpose of peak spreading the growth demand is to replicate the retiming of trip departure times based on the projections of historic count data which provides evidence for the shifting of traffic into the shoulder hours when the network is particularly congested.' Is increasing travel to work times sustainable? What impact does this have on other businesses? What are the implications for health and wellbeing? What are the impacts for those living in areas where peak levels of traffic are extended into the 'shoulder hours'? What about those working in jobs that don't offer flexitime or options to work at home? Will they need to pay extra childcare costs? The policy also needs to ensure that job opportunities for residents in deprived wards are not limited to B8 by a lack of connection to other forms of employment within Coventry & Warwickshire through public transport. The planned closure of the Hello Fresh site in Nuneaton illustrates why overreliance on one sector can increase levels of risk to the local economy. If poor public transport links (and costs) limit the opportunity to work in other sectors, the impacts of such closures will have the greatest effect on deprived wards.			

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						Currently, bus services within Coventry do not cover our 'travel to work areas' (TTWAs) well as many of these fall within Warwickshire. This is in part due to our older industrial sites (brownfield) being used for housing developments since the 1980's. Over the same period, there had been a reduction in employers provided their own subsidised services. Currently, transport appears to be focused on destinations such as the City Centre and University Hospital Coventry as hubs. Although these are important, many workplaces (Ansty Business Park, MIRA Tech Page 10 of 19 Park, Spa Park, Warwick Innovation Centre, Squab Workspace, Prologis Rugby Central Park, Bermuda Park, etc) are based on the outskirts of the City often outside its (and WMCA's) administrative boundary. Although, Warwickshire County Council and many of the district/borough councils are associate members of WMCA this does not appear to be extended to public transport arrangements. This creates issues in terms of access to employment opportunities for those who do not own cars. The cost of buying separate bus tickets/passes to cover the different operators when crossing over an administrative boundary is prohibitive. For example, as soon as you go under the railway bridge CNN/25 Bedworth Road (A444) into Warwickshire, a WMCA bus pass cannot be used. This leads to inconvenience and longer journey times			

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						because customers cannot use all of the services running along a particular route. Poor public transport links across Coventry & Warwickshire also increase the levels of through traffic on roads such as the B4113 (Bedworth Road–Longford Road–Foleshill Road) making bus journeys even longer during peak hours. The following is stated elsewhere within the Regulation 19 Proposed Submission, ‘12.39 Buses offer a realistic modal choice for many local trips, and particularly those into the city centre. Bus network coverage across the city is generally good although there are some examples of where service frequencies are inadequate to provide an attractive and realistic option, such as more peripheral edge of town employment sites.’ ‘12.42 The existing bus network primarily follows the radial network of roads across the city, and whilst this supports good access to the city centre, it does not necessarily support the demand for orbital trips such as those between residential and edge of town employment sites. More recently operators have introduced orbital services which have helped to address this issue. The West Midlands Strategic Transport Plan sets out a			

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						strategy for a core bus network which is closely integrated with a high frequency rail and rapid transit network to enhance connectivity to other strategic centres across the West Midlands.' It is important that policies are cross-referenced to ensure that there is a consistent approach and that delivery on key issues is not undermined. For example, although the issue of access to edge of town employment sites is outlined in the section on 'Active Transport Provision', the policies do not effectively address cross-boundary issues such as access to Coventry's TTWAs within Warwickshire. The policy also states, '...proposals for such development will also need to demonstrate that they would not result in significant harm to the amenities of persons occupying nearby residential property...' How is 'significant harm' defined? Would it not be better to have specific guidelines for B8 regarding nearby residential properties? Why not specify heights and distances with inner and outer zones? Why not require artificial lighting impact assessments? Why not include protections such as requiring loading bays, parking areas and fixed plant to be located away from sensitive receptors? Why not require the use of landscaped buffers and acoustic bunds? At what point			

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						should proposals include pick-up and drop-off points for employees, a bus terminus, cycle ways/facilities, overnight parking facilities for HGVs and a separate access road for emergency vehicles? In the long run, outlining requirements within a policy/SPD would benefit developers as well as protecting residents by streamlining the planning process later on. Within the West Midlands Strategic Employment Sites Study 2023/24 Final Report (WMSESS) it states, ‘3.42...More thought to be given to the design of sites close to existing residential developments or where a residential development is likely to take place in the future.’ ‘6.2 Both the West Midlands Strategic Employment Site 2015 and 2021 studies and definitions in West Midlands Regional Spatial Strategy...confirmed that 25 ha remains a relevant threshold for strategic sites in most instances.’ ‘11.14...The 25 ha / 60 acre threshold was considered the typical minimum to generate sufficient value to support the delivery of enabling infrastructure.’			

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						'...Preferred plot ratios being a minimum of 0.3516...ideally sites would be a minimum of 25ha and readily over 50ha which takes into account the landscaping and infrastructure involved in delivering sites of this scale as well as inclusion of smaller employment units where appropriate.' 'Is located away from incompatible land-uses (including residential) and has the ability to undertake 24/7 unrestricted operating hours and manage noise/lighting expectations.' 'The ability to deliver high-bay warehousing at least 20m height (recognising the landscape impacts and need for appropriate locations and / or mitigation).' Should references be made to the WMSESS threshold (25ha) and technical strategic site criteria within this policy? Is a plot ratio used to calculate the maximum floorspace to ensure that a site remains sustainable and delivers the appropriate level of landscaping and infrastructure? When allocating/assessing sites are constraints such as PRowS, National Grid infrastructure (pylons and wayleaves), water distribution mains and buffers for hedgerows, trees, watercourses and local			

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						wildlife sites identified early on? Are these accounted for within calculations of maximum floorspace?			
Stantec on behalf of HGIT Central Coventry Ltd (ID57)	JE5			N	Y	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.	Please refer to representation	Typo should read 'land'. Suggest potentially adding to point 2c to read "Would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development; or the viability and operation of existing employment generating uses on a site."	Amend typo and add "or the viability and operation of existing employment generating uses on a site."

Policy JE6 - Tourism/Visitor Related Development

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Turley on behalf of the University of Warwick (ID68)	JE6, and paragraph 5.35	Y	Y	N	Y	Policy JE6 gives support for tourism and visitor related development proposals which would contribute towards the city's role as a tourism destination. The corresponding policy in the adopted Local Plan (Policy JE5) makes specific reference to the University of Warwick as a location where tourism/visitor related uses will be supported. However, this reference has not been taken forward into the revised policy in the Regulation 19 Plan. Paragraph 5.35 of the Regulation 19 Plan states that "Tourism/visitor related development such as hotels, conference facilities and leisure/recreation schemes which are classified by the NPPF as Main Town Centre Uses will also need to satisfy the Sequential and, where appropriate, Impact Tests laid	It is recommended that reference to the University of Warwick campus as a location where tourism and visitor related development is supported be made in policy JE6, in order to provide consistency with Policy JE1 and recognise the important role the University plays in this sector and the existing facilities	The policy is considered to be appropriately worded.	No change

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						down in national guidance.” This text is not included within the policy itself. Whilst it is acknowledged the NPPF does set out what are considered to be main town centre uses and requires a sequential test to be undertaken for those uses when not proposed within town centres, given that the University is not in the town centre but is home to the Warwick Arts Centre which is a significant existing visitor/tourist attraction within Coventry, and also home to established conference facilities it is considered that any future extensions to the Arts Centre and/or the conference facilities should not be required to be sequentially assessed. Such proposals would be to serve the University/Arts Centre and therefore would not be appropriate on any site other than within the campus. The loss of a specific reference to the University campus from Policy JE6 is also questioned by the University. Given that reference is made in Policy JE1, it is submitted that this should be carried forward into Policy JE6. There does not appear to be	which are within the campus. Amendments should also be made to paragraph 5.35 to reflect that the University of Warwick campus is an established destination in its own right due to the existing tourism/visitor and conference facilities contained within it. By its nature it is therefore different to other locations outside of main town centres where such		

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						a clear reason why this specific reference has been removed. The University therefore, considers that Policy JE6 has not been positively prepared and is not sound.	facilities may be proposed. Tourism/visitor related proposals and proposals related to conferences facilities within the defined campus of the University (as defined by the SPD) should therefore not be subject to the sequential tests.		

Policy JE7 - Accessibility to Employment Opportunities

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined Authority (ID67)	JE7	Y	Y	Y	N	N/A	Policy JE7 does not explicitly reference improving walking, cycling, and public transport links to employment. Given accessibility requirements, particularly for deprived areas, greater priority should be given to sustainable travel modes.	Comments noted. CCC considers that the policy as currently drafted is sufficient as policies of the plan need to be read as a whole.	No change

Policy JE8 - Location of Research and Development (R&D)

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Stride Treglown on behalf of Coventry University Group (ID61)	5.3 9-5.4 1 JE8	Y	Y	Y	Y	The University Group acknowledges the importance of R&D uses, such as laboratories linked to universities, and would be willing to share information as to the University Group's continuing interests in R&D distribution and facilities across its estate. The repurposing and/or redevelopment of R&D facilities controlled by the University Group requires a degree of flexibility during the Local Plan period: policies which artificially protect R&D uses on defined University Group controlled sites would not be supported as such a policy could be applied to prevent alternative uses in accordance with the needs of the University Group and the delivery of its Adopted Estate	This representation is made in the interests of positive and effective planning, reference to CC1 should be included within the supporting policy text to JE8 and/or within Policy JE8 Part 2 sub-section d.	CCC considers that both the supporting text to JE8 and the policy itself are sufficient to enable suitable R&D facilities to be provided across Coventry, including the city centre. We do not consider that there is a need to bolster the policy with reference to CC1.	No change

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						Strategy, and wider City Centre policy objectives. By way of example, the range of facilities which are required to support a large university are changing as expectations increase over the need to accommodate regional, national and international conferences, symposiums and exhibitions. These requirements make a positive contribution towards the local economy as well as an increasingly important income stream for the university. Facilities which support conferencing within the City Centre will be captured in site specific masterplans and proposals to be led by the University Group. The operational advantages of supporting conferences may outweigh the benefits of retaining employment and/or quasi R&D activities within the University Group's Technology Park.			

Overarching comments (non-policy)

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Nurton Developments Ltd (ID45)	5.14	No response	No response	N	Y	This paragraph, under the heading of Provision of Employment Land and Premises, refers to a residual need for development land for strategic big box industrial and warehouse units of 136 - 311 ha across Coventry & Warwickshire for the period 2021 to 2041. The source of this need is the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (the Alignment Paper), which was produced by Iceni in September 2024 and updated in November 2024. Paragraph 4.11 of the Alignment Paper breaks down the sub-regional need into three areas. These areas correspond with	For the reasons set out in response to Question 5, NDL requests that the WMSESS, and the associated Alignment Paper, is reviewed and updated as soon as is practicably possible. In the meantime, NDL suggests that paragraph 5.14 refers to our alternative analysis for the residual need	CCC considers that the evidence is robust and up to date. We will continue to work with colleagues across the FEMA and wider region on all matters including Strategic employment and will	No change

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						those denoted in the WMSESS and are as follows: - • Area 5: North Warwickshire – 50 to 100 ha. • Area 7: M6/A45/A46/M45 Coventry & Rugby – 9 to 84 ha. • Area 8: A46/M40 Warwick – 75 to 125 ha. Area 7 takes in all of Coventry City, Rugby Borough and Nuneaton & Bedworth Borough. It also takes in parts of Warwick District and North Warwickshire Borough that form part of the wider Coventry city region. Geographically, it is a very important area for the wider West Midlands economy, being the home for a number of strategic sectors (e.g. automotive and aerospace) and international companies (JLR, Severn Trent, Meggitt, and soon Frasers).	for Coventry and Warwickshire, with this being a bare minimum of 451 – 602 ha.	continue to seek a range of opportunities to identify strategic employment opportunities.	

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						Area 7 is also located in the heart of the Golden Triangle – the sweet spot for large scale distribution and logistics in the UK. Recent completed developments at Coventry Gateway, Prologis Park (Ryton-on-Dunsmore), Faultlands Park (Bedworth) and Symmetry Park (Rugby) have demonstrated the strength of the market for large scale logistics in this area. Further evidence for the strength of the general area is provided by the rapid take up of large-scale extensions to Magna Park and DIRFT, both of which are located on the boundary to Rugby Borough. NDL has analysed completions of land for the big box market in Area 7 over the last three years at the principal strategic sites. This is presented below in Table 1. Table 1 – Take-up of big box units at existing strategic employment sites in Area 7 since April 2022. (Officer comment:			

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						Please refer to full representation for tables and further information). Over the last three years, 530,689 sqm has been developed on 167.7 ha of land. This equates to broadly 56 ha per annum. If land is made available, then we see no reason why this pace of development should diminish. Indeed, it could be argued that supply has been restricted and this has suppressed demand and resulting completions. In addition, it should be noted that this period (i.e. 2022 to 2025) has seen less development activity than in the recent past because of the steep rise in interest rates since 2022. This has affected adversely development funding for all types of commercial property. NDL has also analysed the supply of deliverable consented or allocated			

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						development land at strategic employment sites which remain available as of today in Area 7. This is presented below in Table 2. Table 2 – Remaining Development Land at Committed Strategic Employment Sites in Area 7 as at 1 March 2025. S In undertaking this analysis, we have discounted a number of the sites listed in Appendix 1 of the Alignment Paper (Strategic Site Commitments) on the following bases: - • Those sites which have been developed since 2022 (i.e. Coventry Gateway (in part), Symmetry Park, Prospero, Prologis Park, and Faultlands Park). • Those which are clearly not deliverable (i.e. Baginton Fields – see our representations to Policy DS1). • Those which do not meet the definition of strategic sites (i.e. Rugby Radio Station			

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						which, at 16 ha, does not meet the size threshold of 25 ha). • Those which include large non-employment areas (i.e. the 100-ha country park at Coventry Gateway). • Those constrained in terms of use (i.e. the Gigafactory at Coventry Airport where the planning permission is restricted to the manufacture of batteries). NDL's detailed analysis of supply is provided in a separate schedule. This is provided in the link below. Analysis of A1. Strategic Sites Commitments These discounts reduce the committed supply in Coventry and Warwickshire from 655.8 ha in 2022 to 243 ha as of today. The corresponding reduction in Area 7 is from 560.3 ha to 92.4 ha. The latter figures include permitted development land at Padge Hall Farm (gross area of 64 ha, development area of			

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						32 ha), which was granted planning permission in December 2023 and has been added to supply (paragraph 4.10 of the Alignment Paper) in generating the final figures for residual need for Areas 5, 7 and 8. If the remaining supply in Area 7 as of today (i.e. 92.4 ha) is added to the projected need (9 - 84 ha) this gives a total potential requirement for the rest of the study period (2025 to 2045) of 101.4 - 176.4 ha. At the current pace of development (i.e. 56 ha per annum), this represents just 1.8 - 3.2 years of supply. Using the upper range identified by the Alignment Paper, this will provide for up to 2028 only, leaving no land available for the remainder of the study period (i.e. from 2028 to 2045). Clearly, this level of supply is wholly inadequate. It will restrict development in a dramatic fashion. It will have obvious and			

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						severe implications. It will act as a direct barrier to growth of the local and sub-regional economy and will have indirect consequences on the wider West Midlands. This outcome would be the polar opposite to what current and emerging economic strategy and planning policy is seeking to achieve. NDL's analysis of the need for strategic land comes to a completely different conclusion. The Alignment Paper refers to a total gross strategic need for sites for Coventry and Warwickshire of 833 - 1,017 ha (Table 3.3). The former figure is derived by a completions model; the latter is derived by a replacement model. This gross need covers the period from 2021 to 2045. It breaks back to 34.7 - 42.3 ha per annum. To compare against current levels of supply (as at March 2025), we have factored this need down for the			

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						shorter period 2025 to 2045. This reduces gross need to 694 - 845 ha for the sub-region. Current supply as at 1 March 2025, as analysed by NDL, is 243 ha. As such, NDL has computed the residual need for Coventry and Warwickshire being 451 ha (i.e. 694 less 243) - 602 ha (i.e. 845 less 243). As set out above, the actual pace of development in Area 7 over the last three years has been significantly greater than the projected gross need for the wider sub region – i.e. 56 ha per annum compared to 34.7 - 42.3 ha per annum. As such, it is clearly arguable that the residual need for Coventry and Warwickshire should be significantly greater than 451 – 602 ha for the remainder of the study period (2025 to 2045). If the pace of development in Area 7 continues at the same rate as the last three			

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						years (i.e. 56 ha per annum), this will project a gross need for the remainder of the study period of 1,120 ha (i.e. 56 X 20) for Area 7. This will lead to residual need of 1,027.6 ha once existing committed supply of 92.4 ha is deducted. This analysis demonstrates how unrealistic the projection of residual need assumed by the Alignment Paper – 9 to 84 ha for Area 7 – is. It clearly has not been sense-checked in terms of the realistic yield of land from committed supply or the latest data available on market demand. For these reasons, NDL contends that its projection of 451 – 602 ha of residual need for strategic employment land for Coventry and Warwickshire should be expressed as a bare minimum. Moreover, consideration should be given in any update to the WMSESS and/or the Alignment Paper to requiring the delivery of a much higher			

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						level of suitable development land, particularly for Area 7. This would have a directly positive effect on the sub-regional economy. A bare minimum residual need of 451 – 602 ha would deliver 291 - 315 ha more land than the projected figures expressed in the Alignment Paper and referenced in paragraph 5.14 of the draft plan. Assuming a 35% site cover, this would accommodate additional built floorspace of 1,018,500 - 1,102,500 sqm. This, in turn, would generate directly more than 10,000 jobs, employing a very broad rule of thumb of 1 job per 100 sqm of floor space. Other benefits would be indirect employment, new infrastructure and significantly increased revenue from business rates. Overall, NDL considers that the WMSESS which underpins the Alignment Paper is a			

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						wellintentioned piece of work. It seeks to boost the allocation of strategic sites across the West Midlands. In addition, its scope is ambitious, seeking to qualify and quantify the amount of land required for each sub-region. Its assessment of gross need is multi-layered and includes sensitivity testing. However, in NDL's view, the study's assessment of existing supply of sites has been wholly uncritical. It has taken information provided by local planning authorities at face value. The information is out of date (based on data prior to 2022) and untested in terms of its capacity or capability to deliver built floor space. This has led to a gross over-estimation of supply and, as a consequence, an under-estimation of residual need. This is particularly prevalent in the assessment of Coventry and Warwickshire and especially so for Area 7, which takes in Coventry, its			

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						economic hinterland, Nuneaton & Bedworth and Rugby. The resulting analysis – with a projected need of just 136 -311 ha to serve the whole of Coventry and Warwickshire – makes no sense in either economic or market terms. Instead, it serves to fundamentally undermine the principal purpose of the study – i.e. the allocation of sufficient number of sites to serve the sub-regional economy for the next 20 years. NDL considers this to be a lost opportunity and is very concerned about the potential consequences on the sub-regional economy. As such, NDL requests that the study – and the associated Alignment Paper – is reviewed and updated as soon as is practically possible.			
Stantec on behalf of HGIT Central	Employment (Jobs			N	Y	3 Evidence Base Review and Comments	Please refer to representation	Comments noted. CCC considers that	No change

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Coventry Ltd (ID57)	and Economy) Background Paper – November 2024 & Associated Evidence Base					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.		the site is suitable for continued employment use and will continue to promote it as such. In relation to the ELR, the comments around the sites expansion opportunities are given as a high level assessment and this does not preclude or ignore the acceptance that the site is in need of remediation and	

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						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.		overall improvement. Given the Local Plan is at a review stage and given the site remain both used and promoted for continued employment use, with no indicated prospect of alternative uses coming forward, CCC considers that allocation would not, at this stage, add anything to the site in relation to protection	

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						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		for employment generating uses.	

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						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			

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						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.			

Chapter 6 - Delivering Coventry's Housing Needs

H1 - Housing Land Requirements

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Define Planning & Design Ltd on behalf of	H1	N	Y	N	Y	The NPPF focuses (paragraph 60) on significantly boosting housing delivery and the importance of delivering a sufficient amount and variety of land to meet a range of housing needs. In addition, the NPPF states that “planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”. This is also discussed in representations to Policy H2 (Housing Allocations).	The housing requirement must be revisited to comply with national policy including applying the cities uplift and evidencing exceptional circumstances for	The plan period starting in 2021 is robust as it aligns to the evidence base (HEDNA and census 2021). The exceptional circumstances to	No change

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If of William Davis Homes (ID14)						Policy H1 identifies that a minimum of 29,100 additional dwellings will be provided between 2021 and 2041. Table 6.1 suggests the housing land supply is actually 31,493 homes, therefore incorporating a small buffer. The standard method housing need for the area, including uplift, is 3,188 dwellings per annum. As set out in the NPPF, this should be the starting point for establishing a housing requirement for the area (paragraph 61). The Council has not sufficiently demonstrated that there are exceptional circumstances to justify an alternative approach and as such the plan must be found unsound. Even if exceptional circumstances were demonstrated the uplift should still be applied to ensure the principles of delivering homes to allow people to live near the services they rely on, making travel patterns more sustainable (footnote 27) is achieved. Were an uplift applied to the HEDNA figure; the Council would need to deliver 1,964 dwellings per annum. Over the twenty years of the Plan this totals a need of 63,760 or 39,280. Further, as set out in representations to the Regulation 18 Plan, a failure to identify an appropriate housing requirement presents a risk to the future of the City's residents in that the under supply of housing in the city and surrounding area, particularly that for	using an alternative method than the standard method. The Council must review the site allocations and provide further evidence of the availability, achievability and deliverability of the allocations. A review of Green Belt sites must be undertaken, including Land at Duggins Lane, to ensure sufficient range and mix of housing is provided	use the HEDNA and census 2021 (given the significant discrepancies in the 2014 based SM for Coventry) is justified in the HEDNA and the housing and growth needs background papers. The findings of the Green Belt Technical Update Study, which demonstrates the green belt areas in the city continue to serve Green Belt purposes very well, is robust and	

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Res ponde nt / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						families, and will only exacerbate the housing crisis and perpetuate its acute socio-economic consequences in the area. Notably, the Council's approach will limit the supply of affordable housing and fail to address issues relating to the diversity of the existing housing stock. These matters have not been sufficiently considered in the Sustainability Appraisal. Given the concerns raised in this representation and that in response to Policies DS1 (Overall Development Needs) and H2 (Housing Allocations), to find the Plan sound, the housing requirement must be revisited and as a result, additional sites should be allocated. The allocation of additional development sites would also help to safeguard against the failure to deliver brownfield land. Given the significant housing needs in the area and nationally, there are clearly exceptional circumstances to justify the release of land from the Green Belt to meet housing needs and deliver an appropriate mix of housing types (NPPF paragraph 60). Even were the housing requirement found to be sound, as set out in the above referenced representations, there are significant concerns on the deliverability and availability of allocated sites. As such, additional sites should be safeguarded for development to plan positively in case delivery falls below the housing needs for the area	to meet housing needs.	therefore no further green belt is proposed to be released. The evidence base shows the city can accommodate its housing supply within its boundary on brownfield land. The proposed need figure for Coventry at 1455 dpa is higher than the new standard method (2024) at 1388 dpa. The evidence base is robust and ensures better delivery of the	

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						or the housing needs increase. This will ensure the Council has taken a positive approach to ensuring housing needs are met, including much needed affordable housing. The Council has failed to recognise the important contribution that small and medium sized sites, such as William Davis Homes' site at Duggins Lane, can make to meeting housing requirements and their relatively quick build out (NPPF paragraph 60). William Davis Homes' site at Duggins Lane such a site and is a deliverable, available and achievable development site which could deliver up to 55 homes including affordable homes and green infrastructure and should be considered for allocation. Further, the Council has failed to comply with the Duty to Cooperate in that it has not demonstrated how it will meet its housing needs, particularly affordable housing nor has it appropriately considered any unmet needs from neighbouring authorities. Whilst the HEDNA 2022 did reduce the housing need for Coventry, the overall housing needs for the Coventry and Warwickshire HMA only reduced by 549 dpa with the areas of Rugby, Stratford-on-Avon and Warwick in particular picking up the increase between the standard method (2014 based) and trend based scenarios. These authorities are also impacted by the new standard method which has seen housing needs rise including in Stratford-on-Avon and Warwick. Insufficient		housing need as it allows increases to density across the city; the lowering of the AH threshold across most of the city; and for the housing mix to align to the HEDNA.	

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						evidence has been provided to demonstrate that the Council has complied with the Duty to Cooperate.			
Marrons on behalf of Richborough (ID31)	H1	No response	No response	N	Y	Policy H1: Housing Land Requirements – Plan Period <u>Not Sound</u> 42. Policy H1 is not positively prepared, justified, or consistent with national policy. 43. Policy H1 1. defines the Plan period as 2021-2041. The Local Plan will not be adopted until at least 2026, five years into the Plan period. There is no justification for a Plan period that starts five years before the Plan is adopted, and there is no support for adopting such an approach in the NPPF or NPPG. 44. NPPF paragraph 21 requires strategic policies to look ahead over a minimum 15 year period. There is no requirement for strategic policies to also look backwards 5 years. 45. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement.	Policy H1 1. should therefore be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. Appendix 3 should be amended to ensure the Plan demonstrates the updated housing	The plan period starting in 2021 is robust as it aligns to the evidence base (HEDNA and Census 2021). A retrospective start date is normal practice. The Council considers it will have 15 years looking forward from adoption in line with the NPPF and the LDS will be amended prior to submission to demonstrate this.	Updated trajectory

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						46. Policy H1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were 7,351 completions⁵. Therefore, there were 2,986 completions in excess of the proposed Local Plan requirement (7,351 - 1,455 x 3). The inclusion of supply between 2021-2024 means that the housing requirement for the 15 years ahead from 2026-2041 will not be met (total capacity 31,493⁶ – 2,986 = 28,507 which is less than the minimum of 29,100 homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected. 47. The NPPF paragraph 60 clearly states the Government's objective is to significantly boost the supply of homes. That has not changed with the change in Government. By adopting a Plan period that looks back 5 years, the Council is manipulating the figures to avoid meeting the housing needs of the City. 48. Further to the above point, Policy H1 1. only plans to 2041. NPPF Paragraph 22 is clear that Local Plans should look ahead	requirement in line with representations made above can be met with an appropriate buffer.	The evidence base shows the OAN can be met within the city boundary; 1,455dpa is higher than the new standard method of 1,388dpa; and the AH threshold can be lowered across most of the city. Coventry is a constrained city which sits within its own HMA and therefore taking the Greater Birmingham HMA	

⁵ Table 5 of the HELAA November 2024

⁶ Total projected completions up to 2041 in Appendix 3 Housing Trajectory

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						over a <u>minimum</u> 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged. Policy H1: Housing Land Requirements – Housing Requirement <u>Not Sound</u> 49. Policy H1 1. also specifies the minimum housing requirement as 29,100 (1,455 dpa). This is based on the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022), minus 10,180 dwellings (509 dpa) based on removing 35%. The removal of 35% is a reference to the ‘urban uplift’ which should be applied to the Local Housing Need calculation using the Standard Method, and not the HEDNA method of calculating housing need. 50. Whilst the HEDNA approach to determining the appropriate level of housing growth to be planned for in Coventry is considered acceptable in principle, concerns are raised relating		shortfall is not reasonable. In terms of identifying / having consideration of the city’s lapse rate, the housing supply figure applies a buffer and so is a robust position. The trajectory in Appendix 3 has been informed by the evidence in the HELAA and AMR and these should be referred to when looking to interrogate individual sites. An	

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						to the future job growth forecasts used in preparing the HEDNA being unduly pessimistic. 51. The HEDNA uses the Cambridge Econometrics (CE) March 2021 baseline economic growth forecast. This forecast was prepared during the COVID-19 lockdown when economic growth was far from certain and was informed by uncertain economic conditions. The CE forecast is for 0.44% per annum growth (820 jobs per annum) in Coventry over the CLPR Plan period, less than the 1.0% per annum growth (equivalent to 1,995 jobs per annum) experienced since 1981, and growth of over 2% per annum between 2011 and 2019 (3,338 jobs per annum). The CE forecasts were also based on 3.6% GDP in 2021 and a 2.8% increase in GDP in 2022. Reference to the ONS' December 2022 GDP monthly estimate report states how GDP is estimated to have grown by 4.0% in 2022, following growth of 7.6% in 2021. 52. Furthermore, the HEDNA identifies how 551 hectares of logistics floorspace is needed across the housing market area to 2041. However, the location for this land has not been confirmed and so the job growth associated it has not been considered.		updated trajectory has been prepared for submission.	

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						53. As a minimum, 1.0% growth since 1981 should be assumed, which aligns with the 1,964 dwellings per annum established by the HEDNA and emphasises how the housing requirement of 1,455 dwellings per annum is inadequate. 54. It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure of 1,964 dwellings per annum represents the <u>minimum</u> number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with national guidance⁷; for example in order to address a significant affordable housing shortfall, support economic development or address strategic infrastructure requirements which are likely to increase the number of homes needed. 55. The HEDNA describes affordable housing need across the HMA as “<i>clearly acute</i>” and identifies a “<i>notable need</i>” for affordable housing. It also states how it is clear that provision of new affordable housing is an “<i>important and pressing issue in the area</i>”. Figure 8 of the AMR 2023/24 shows that 2,933 affordable			

⁷ Paragraph: 010 Reference ID: 2a-010-20201216 of National Planning Practice Guidance

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						homes have been delivered since 2011 compared to a Local Plan requirement of 4,176 dwellings for the same period. 56. The HEDNA calculates <i>significantly higher</i> affordable need in CCC of approximately 2,000 affordable dwellings per annum. This reflects the Council's waiting list (over 13,000 households), a 68% increase in the number of households in temporary accommodation in only 24 months, a 114% increase in only five years in the number of households who are homeless and owed a relief duty, and the fact that Coventry has the 12th highest ratio of homeless households per 1,000 population of over 300 local authorities in England. 57. Addressing affordable housing need in any meaningful way will require an uplift to the HEDNA's calculation of 1,964 dwellings per annum. 58. Further consideration should also have been given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular			

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						which require addressing in this Plan and which have not been addressed within the Duty to Co-Operate Statement. <i>Birmingham and the Black Country</i> 59. There are strong functional relationships between Birmingham, the Black Country and Coventry, in terms of transport connections and commuting patterns, and development in Coventry can contribute towards meeting unmet needs. Whilst Coventry has historically not been seen as part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), Coventry was recognised within the HMA Strategic Growth Study commissioned by the local authorities as being a location that could contribute to addressing unmet needs given its strong functional links. 60. The most recent Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings arising from the GBBCHMA with total contributions of only 18,181 dwellings committed. However, this is now out-of-date on account of Local Plan progress and revisions to the calculation of Local Housing Need derived from			

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						the Standard Method. Work is underway to update the Position Statement to 2025. <i>Birmingham</i> 61. There are strong functional relationships between Birmingham and Coventry and the relationships across the wider area should be understood including the relationship between homes and jobs as a Functional Economic Market Area. 62. It is recognised that the shortfall arising from Birmingham is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum given the Local Housing Need derived from the Standard Method has decreased to 4,448 dwellings per annum. Indeed, based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Birmingham Local Plan period 2020 to 2042 and comparing with reported supply in the Birmingham Local Plan Preferred Options (July 2024), the shortfall arising from Birmingham will have been eradicated. <i>Dudley</i>			

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						63. The Dudley Local Plan was subject to Regulation 19 consultation in October and November 2024. It reports a housing need of 11,169 dwellings in the Plan period 2024 to 2041 with supply of 10,470 dwellings, resulting in a shortfall of 699 dwellings to be exported through the Duty to Cooperate. 64. It is noted that the housing requirement is based on the Local Housing Need derived from the previous Standard Method of 657 dwellings per annum; this has now increased significantly to 1,462 dwellings per annum. 65. Should the Dudley Local Plan be submitted for Examination before 12th March 2025 it will be captured by the transitional arrangements set out in the NPPF and able to continue on the basis of the lower Local Housing Need derived from the previous Standard Method. However, should the Dudley Local Plan not progress to Examination before 12th March 2025, the Council will be required to utilise the increased Local Housing Need derived from the Standard Method for plan-making. Based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Dudley Local Plan period 2024 to 2041 and comparing with reported supply in the Dudley			

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						Local Plan Publication Plan (October 2024), the shortfall arising from Dudley would increase to some 14,384 dwellings. <i>Sandwell</i> 66. The Sandwell Local Plan was submitted for Examination in December 2024. It reports a supply of 10,434 dwellings compared with a housing need of 26,350 dwellings in the Plan period 2024 to 2041, resulting in a shortfall of some 15,916 dwellings to be exported through the Duty to Cooperate. 67. It is noted that Sandwell's Local Housing Need derived from the Standard Method has marginally reduced from 1,550 dwellings per annum to 1,346 dwellings per annum, however given the stage of preparation of the Sandwell Local Plan it is captured by the transitional arrangements in the NPPF. In any case, the shortfall in supply in Sandwell is significant. <i>Walsall</i> 68. Further to the disbandment of the Black Country Plan in late 2022, Walsall Council have not yet made notable progress on a new Local Plan, with Issues and Options consultation is expected			

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						in 2025. Given the shortfall reported in the Black Country Plan and the increase in Walsall's Local Housing Need derived from the Standard Method since (now 1,148 dwellings per annum), it is likely that there will continue to be a shortfall arising from Walsall that requires consideration. <i>Wolverhampton</i> 69. The Wolverhampton Local Plan was subject to Regulation 19 consultation in November 2024 to January 2025. It reports a housing need of 19,728 dwellings in the Plan period 2024 to 2042 with supply of 9,330 dwellings, resulting in a shortfall of some 10,398 dwellings to be exported through the Duty to Cooperate. <i>Contributions to Shortfall</i> 70. The GBBCHMA Position Statement Addendum outlines contributions towards unmet needs committed at April 2023, however several of these commitments have now fallen away or been reduced. 71. 2,665 dwellings contribution from Lichfield are noted in the Position Statement Addendum, however the Lichfield Local Plan			

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						was withdrawn in October 2023. Initial work on a new Local Plan has commenced and was subject to Issues and Options consultation in October to December 2024. The Issues and Options document confirms commitment to the Duty to Cooperate but does not set a commitment to meeting unmet needs arising from the GBBCHMA. 72. 1,500 dwellings contribution from Shropshire are noted in the Position Statement Addendum. Whilst this is still maintained, the Shropshire Local Plan Review is currently under scrutiny at Examination with significant soundness concerns raised by the Inspectors. There is therefore potential for the Shropshire Local Plan Review to be withdrawn and the committed contribution to unmet needs to disappear. 73. 2,105 dwellings contribution from Solihull are noted in the Position Statement Addendum, however the Solihull Local Plan Review was withdrawn in October 2024, with no progress yet made on a new Local Plan. 74. 4,000 dwellings contribution from South Staffordshire are noted in the Position Statement Addendum, however this has been			

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Res ponde nt / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						reduced to 640 dwellings in the South Staffordshire Local Plan submitted for Examination in December 2024. 75. The net result of the above is a reduction of some 8,130 dwellings in commitments to unmet needs arising from the GBBCHMA, with a further 1,500 dwellings committed also potentially falling away. 76. It is noted that the Telford and Wrekin Local Plan Review will be subject to Publication consultation from March 2025 and includes a commitment to 153 dwellings per annum towards unmet needs arising from the Black Country, however the total level of unmet needs to be met is not clear and it remains untested through Examination. <i>Conclusion on Unmet Needs</i> 77. Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum, the shortfall is still significant. In addition, the level of committed contributions towards unmet needs has decreased.			

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Respon dent / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						78. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry in the Duty to Co-Operate Statement. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF. 79. Policy H1 1. should therefore be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. Policy H1: Housing Land Requirements – Housing Supply <u>Not sound</u> 80. Policy H1 2. states the housing requirement is to be delivered in line with the trajectory set out in Appendix 3. 81. Appendix 3 includes a significant level of completions since 2021/22 (7,666 dwellings) and committed supply (13,975 dwellings). As set out in the accompanying Housing and Economic Land Availability Assessment (HELAA, November			

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						2024), committed supply comprises sites under construction (3,545 dwellings), sites with detailed planning permission not commenced (4,970 dwellings), sites with outline planning permission not commenced (5,314 dwellings) and permitted development (146 dwellings). 82. The Council should ensure that committed supply is 'Developable' in line with the NPPF Glossary and set out a detailed trajectory illustrating expected delivery rates. This is particularly important for sites with outline planning permission not commenced, and on all sources of supply where they may be questions marks over deliverability or viability which need to be appropriately evidenced. 83. Notwithstanding this, it is noted that no account is taken of the likelihood that not all committed supply not started will come forward, with planning permissions inevitably expiring often due to unforeseen or a change in circumstances before they are commenced. No evidence is provided of historic lapse rates in the City, and an appropriate lapse rate needs to be applied to committed supply not started to ensure it is robust. A minimum 5% lapse rate is considered appropriate. Applying a 5% lapse rate to committed development not started would reduce the			

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						level of committed supply accounted for in the Plan to 13,454 dwellings. 84. Turning to 2017 Local Plan Allocations, it is noted that no progress has been made on H2:03 Walsgrave Hill Farm which is allocated and proposed to be carried forward for 900 dwellings. Indeed, the Council's own HELAA assessment of the site (HEN-002-24) raises deliverability concerns and suggests it is not available until 11+ years. Given the lack of progress made on the site since it was allocated eight years ago and concerns raised in the HELAA, it is considered that this site is not Developable in line with the NPPF Glossary definition and should not be carried forward. 85. Similarly, H2:16 Land at Carlton Road (85 dwellings) has not been progressed since its allocation in 2017 and indeed is an existing industrial site with current occupiers. No evidence is provided with regard to future intentions of occupiers or the landowner. H2:19 Land at Mitchell Avenue (50 dwellings) has also not been progressed since its allocation in 2017, neither has H2:20 Land at Durbar Avenue (45 dwellings) or H2:22 Land at Jardine Crescent (25 dwellings). These sites should also be			

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						removed as carried forward allocations as not Developable in line with the NPPF Glossary. 86. It isn't clear how this is being accounted for in the HELAA, but in some cases sites are referenced in more than one element of supply, for example where a site is a carried forward allocation but also has consent. Clarity should be provided on this point, and the Council should ensure no sites are being double counted in the supply as a result. 87. Proposed new allocations are explored further in response to Draft Policy H2 Table 6.2 below. There are a number of proposed new allocations which aren't considered to meet the definition of Developable as set out in the NPPF Glossary, totalling 730 dwellings. 88. In addition to identified sites, the Plan is proposing to include in the overall supply a further 816 dwellings on 'other identified HELAA' sites and an additional 2,800 dwellings in windfall allowance. Justification for windfall allowance is provided in the HELAA which sets out that 200 dwellings per annum is considered appropriate, taking effect from 2027/28 to avoid			

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						double counting. This is justified on the basis of recent windfall delivery rates in the City. 89. NPPF Paragraph 72 is clear that <u>compelling evidence</u> is required to justify a windfall allowance, having regard to the HELAA, historic windfall delivery rates and <u>expected future trends</u>. The HELAA does not consider influences on future trends of windfall delivery in the City and therefore does not comply with NPPF Paragraph 72 in providing compelling evidence. 90. Given the lack of compelling evidence, it is considered that the proposed windfall allowance should be removed from anticipated supply. Furthermore, given there is no certainty around delivery of sites identified in the HELAA which are not allocated and do not have planning permission, including land availability and any significant infrastructure requirements or land remediation which means the sites cannot be viably delivered, this supply does not meet the definition of Developable as set out in the NPPF Glossary as should not be counted towards the CLPR supply as a result. 91. Notwithstanding this, it is considered likely that the inclusion of identified HELAA sites in addition to a windfall allowance is likely			

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						to be double counting, as inherently these identified HELAA sites would come forward as windfall development. 92. The implication of the above assessment is the Plan overestimates supply as follows: <table><tr><td></td><td>Plan Assessment</td><td>N</td></tr><tr><td>Completions from 2024</td><td>315</td><td></td></tr><tr><td>Committed Supply</td><td>13,795</td><td></td></tr><tr><td>2017 Local Plan Allocations</td><td>2,733</td><td></td></tr><tr><td>Proposed New Allocations</td><td>3,503</td><td></td></tr><tr><td>Other Identified HELAA Sites</td><td>816</td><td></td></tr><tr><td>Windfall Allowance</td><td>2,800</td><td></td></tr><tr><td>Total Supply</td><td>23,962</td><td></td></tr></table> 93. The housing requirement will therefore not be delivered in line with the trajectory in Appendix 3, and Policy H1 is not positively prepared, justified, effective, or consistent with national policy. 94. Appendix 3 should be amended to ensure the Plan demonstrates the updated housing requirement in line with		Plan Assessment	N	Completions from 2024	315		Committed Supply	13,795		2017 Local Plan Allocations	2,733		Proposed New Allocations	3,503		Other Identified HELAA Sites	816		Windfall Allowance	2,800		Total Supply	23,962				
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						representations made above can be met with an appropriate buffer. Policy H1: Housing Land Requirements – Five Year Supply <u>Not sound</u> 95. Policy H1. and Appendix 3 is not consistent with national policy. 96. Appendix 3 sets out an annualised housing trajectory by category of supply, but no trajectory is provided which illustrates what the expected site-by-site breakdown of this is. As such, it is not possible to interrogate this in any detail. This is particularly important as the Plan will be required to demonstrate a Five-Year Housing Land Supply of deliverable sites at the point of Adoption (NPPF Paragraph 69 a)). It is noted that Appendix 3 provides the expected position as of 2024/25, but clearly the Plan will not be adopted during the 2024/25 monitoring year. 97. It is also noted there is a significant level of commitments with outline permission in the five-year period (taken from 2025/26 or 2026/27 as the base date), which are unlikely to meet the definition of Deliverable as set out in the NPPF Glossary unless clear evidence that housing completions will begin on site within five years is available. Without the site-by-site breakdown, it is			

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						not possible to conclude the Plan is consistent with national policy in paragraph 69 a).			
Marrons on behalf of Catesby Estates (ID27)	H1	Y	Y	N	Y	As set out in response to Policy DS1, the Plan period and housing requirement set out are unsound on the basis of not being positively prepared, justified, or consistent with national policy. Policy H1 1. should be amended in line with amendments with Policy DS1 to set a housing requirement of a minimum of 35,352 additional dwellings between 2024 to 2042, plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. - The Council should ensure that committed supply is 'Developable' in line with the NPPF Glossary and set out a detailed trajectory illustrating expected delivery rates. This is particularly important for sites with outline planning permission not commenced, and on all sources of supply where they may be questions marks over deliverability or viability which need to be appropriately evidenced. - Notwithstanding this, it is noted that no account is taken of the likelihood that not all committed supply not started will come forward, with planning permissions inevitably expiring often due to unforeseen or a change in circumstances before they are commenced. No evidence is provided of historic lapse rates in the	Policy H1 1. should be amended in line with amendments with Policy DS1 to set a housing requirement of a minimum of 35,352 additional dwellings between 2024 to 2042, plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. A 5% lapse rate should be applied to commitments not started.	The plan period starting in 2021 is robust as it aligns to the evidence base (HEDNA and Census 2021). A retrospective start date is normal practice. In terms of identifying / having consideration of the city's lapse rate, the housing supply figure applies a buffer and so is a robust position.	Delivery on identified sites to be modified based on latest information acquired and from discussions with site promoters and developers.

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						City, and an appropriate lapse rate needs to be applied to committed supply not started to ensure it is robust. A minimum 5% lapse rate is considered appropriate. Applying a 5% lapse rate to committed development not started would reduce the level of committed supply accounted for in the Plan to 13,454 dwellings. Turning to 2017 Local Plan Allocations, it is noted that no progress has been made on H2:03 Walsgrave Hill Farm which is allocated and proposed to be carried forward for 900 dwellings. Indeed, the Council's own HELAA assessment of the site (HEN-002-24) raises deliverability concerns and suggests it is not available until 11+ years. Given the lack of progress made on the site since it was allocated eight years ago and concerns raised in the HELAA, it is considered that this site is not Developable in line with the NPPF Glossary definition and should not be carried forward. Similarly, H2:16 Land at Carlton Road (85 dwellings) has not been progressed since its allocation in 2017 and indeed is an existing industrial site with current occupiers. No evidence is provided with regard to future intentions of occupiers or the landowner. H2:19 Land at Mitchell Avenue (50 dwellings) has also not been progressed since its allocation in 2017, neither has H2:20 Land at Durbar Avenue (45 dwellings) or H2:22 Land at Jardine Crescent (25 dwellings). These	• 2017 Local Plan Allocations H2:03, H2:16, H2:19, H2:20 and H2:22 should be removed. • Proposed New Allocations H2:31 and H2:36 should be removed from the supply, as set out in response to Policy H2. • The proposed windfall allowance should be removed from the supply. • The 'Other Identified HELAA Sites' should be removed from the supply. • Additional sites should be identified	The Council considers it will have 15 years looking forward from adoption in line with the NPPF and the LDS will be amended prior to submission to demonstrate this. The Council's justification for its delivery figure is set out in the HELAA and AMR and housing background paper. Coventry is a constrained city which sits within its own HMA and	

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						sites should also be removed as carried forward allocations as not Developable in line with the NPPF Glossary. - It isn't clear how this is being accounted for in the HELAA, but in some cases sites are referenced in more than one element of supply, for example where a site is a carried forward allocation but also has consent. Clarity should be provided on this point, and the Council should ensure no sites are being double counted in the supply as a result. - Proposed New Allocations H2:31 and H2:36 should be removed from the supply, as set out in response to Policy H2. - Given the lack of compelling evidence, it is considered that the proposed windfall allowance should be removed from anticipated supply. Furthermore, given there is no certainty around delivery of sites identified in the HELAA which are not allocated and do not have planning permission, including land availability and any significant infrastructure requirements or land remediation which means the sites cannot be viably delivered, this supply does not meet the definition of Developable as set out in the NPPF Glossary as should not be counted towards the CLPR supply as a result. Notwithstanding this, it is considered likely that the inclusion of	to meet the housing requirement. Appendix 3 should be updated to include a site-by-site breakdown of anticipated delivery. Appendix 3 should be reviewed to ensure sites within the five year period are 'Deliverable', and the Five Year Housing Land Supply Assessment taken from 2025/26 or 2026/27/	therefore taking the Greater Birmingham HMA shortfall is not reasonable. The evidence base confirms the council's approach to windfall is justified and sound. The trajectory in appendix three has been informed by the evidence in the HELAA and AMR and these should be referred to when looking to interrogate individual sites.	

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						identified HELAA sites in addition to a windfall allowance is likely to be double counting, as inherently these identified HELAA sites would come forward as windfall development. - The implication of the above assessment is the CLPR overestimates supply; Marrons identify a shortfall against the requirement as a result. Policy H1 2.and Appendix 3 should be amended to ensure sufficient sites are identified to meet the housing requirement. Furthermore, Policy H1 3. is not consistent with national policy. Appendix 3 sets out an annualised housing trajectory by category of supply, but no trajectory is provided which illustrates what the expected site-by-site breakdown of this is. As such, it is not possible to interrogate this in any detail. This is particularly important as the Plan will be required to demonstrate a Five-Year Housing Land Supply of deliverable sites at the point of Adoption (NPPF Paragraph 69 a)). It is noted that Appendix 3 provides the expected position as of 2024/25, but clearly the Plan will not be adopted during the 2024/25 monitoring year. - It is also noted there is a significant level of commitments with outline permission in the five-year period (taken from 2025/26 or 2026/27 as the base date), which are unlikely to meet the definition		Assessment of all sites is considered sound and further discussions with site promoters and developers has taken place since the Regulation 19 submission and modifications to the delivery on identified sites and to the trajectory will be forthcoming.	

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						of Deliverable as set out in the NPPF Glossary unless clear evidence that housing completions will begin on site within five years is available. Without the site-by-site breakdown, it is not possible to conclude the Plan is consistent with NPPF Paragraph 69 a).			
Nexus Planning on behalf of CEG Land Promotion III (CEG)(ID39)	H1	N	N	N	Y	CEG strongly object to the approach of Policy H1 as it is unsound as set out below. As already outlined in the response to Policy DS1, CEG object to the Council's proposed housing requirement. CEG also consider that the Council will need to work with neighbouring authorities through the duty to cooperate to meet both its overall need, assuming this is uplifted to include the 35% urban uplift, and to meet the demand for different types of housing unlikely to be delivered within Coventry's boundaries. In this regard, the Council should support development at the safeguarded land within the Warwick District Local Plan (Policy DS21 – S1) which is adjacent to the safeguarded land in the Coventry Local Plan (Policy GB2), under the Duty to Cooperate. CEG are also promoting wider land holdings to the South of Coventry, adjacent to the safeguarded land, which offers a wider opportunity to accommodate Coventry's housing need in a sustainable location that has a strong spatial relationship with the city. The site is being promoted by CEG for development as part of	Policy DS20 'Directions for Growth South of Coventry' of the WDLP acknowledges the transformational change that could occur in the area and commits Warwick District Council (WDC) to an early partial review within five years of the date of adoption of the plan (Summer 2022). The policy is clear that this will allow the Council to address any	The Council considers that its approach to calculating housing need based on the HEDNA is robust. Development along Coventry's southern boundary in WDC's area forms part of the DtC and your promotion of sites off Westwood Heath Road is noted. The council will retain the classification of the	No change

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						the South Warwickshire Local Plan ("SWLP") and has been confirmed as suitable for development and also identified as a Spatial Growth Option in the Preferred Options consultation document. Coventry, through the duty to cooperate, should support development of the safeguarded land (Policy DS21-S1 of the Warwick District Local Plan) at Westwood Heath and a spatial strategy that seeks to direct wider housing growth to the south of Coventry. Further details of the safeguarded land and the wider land to the south of it, described collectively as "the site" is provided below.	additional evidence regarding the need and potential for development in this area and in particular to ascertain whether necessary infrastructure has become available to allow safeguarded land to be brought forward to meet local housing need. The Coventry City Local Plan (the subject of this review) similarly safeguarded an area of land south of Westwood Heath Road (Policy GB2)	safeguarded greenbelt in line with national policy until further information on the approach of the SWLP is known.	

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Res p o n d e n t / o r g a n i s a t i o n / a g e n t	S e c t i o n	Com p l i e s w i t h D u t y t o C o o p e r a t e Y/N	Leg a l l y C o m p l i a n t ? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							which would be released upon a review of the plan and clarity on development proposals within Warwick District. Having regard to the above, WDC subsequently commenced preparation of a wider south of Coventry masterplan framework, which is now in progress. <u>Sustainable Location</u> The site benefits from easy access to a range of services and facilities. It is not		

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							subject to any landscape designations, it is located within Flood Zone 1 and does not contain any designated heritage assets. Whilst situated wholly within the Green Belt, circa 30 ha of the site is identified as safeguarded land (to meet longer term strategic development needs) through Policy DS21 of the WLP. Part of the site is located adjacent to		

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Respon dent / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							and south of the Westwood Heath Road and would form a natural extension to the existing residential area. It benefits from having direct frontage along the Westwood Heath Road thus enabling a new junction to be accommodated to access the development. A number of local facilities including the Westwood Academy Secondary School, recreational pitches, a Sport and Wellness Hub, and		

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Res ponde nt / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							convenience food stores are in the immediate vicinity of the site. Tile Hill station (offering connections to Birmingham and London) is 1.4km away and Coventry City Centre is 6.4km and is accessible by Bus and Cycle. Local bus stops are within a comfortable walking distance from the site along within the University of Warwick's main campus making public transport a genuine option for travel.		

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							The site benefits from excellent pedestrian infrastructure with continuous footways on the North side of Westwood Heath Road which can be enhanced. Similarly, the proximity to the campus will facilitate access to existing cycle infrastructure and this will be integrated with the green travel corridor providing links into Coventry and across the area. This corridor also has the potential to integrate with wider connections to the		

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							HS2 interchange at Arden Cross. The site is therefore in a highly sustainable position that benefits from excellent public transport linkages. Development in this location would provide a significant level of market and affordable housing and supporting community infrastructure. It would also help facilitate the delivery and provide financial contributions towards a green-travel corridor which		

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							would facilitate an improved southern access to The University of Warwick. These infrastructure improvements will align with the significant transport improvements already being implemented in the area, including the improvements at the A46 Stoneleigh Junction and the new crossing of the A45, which would, in its own right, deliver significant social and economic benefits locally and at the subregional level.		

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							Our proposals would also align with the opportunities identified by WDC through the planned preparation of a wider south of Coventry masterplan. At this stage, a 'Conceptual Framework' is provided (enclosed to these representations) to outline how development of Westwood Heath could sustainably be delivered across land ownerships. This demonstrates that		

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							the site can address site specific considerations, comprising the following development within CEG's control: · Circa 2,500 market and affordable dwellings of a type that will make a significant contribution to specific housing needs, divided as follows: - Circa 650 within the safeguarded land; and - Circa 1,850 dwellings within wider land. · Employment/comme		

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							rcial development in a strategic location to offer collaboration opportunities between business and the university; · Significant community infrastructure provision including a neighbourhood centre, a 2 FE primary school, sports pitches, public parkland and biodiversity parkland; · A substantial network of green infrastructure with green corridors that will provide opportunities for		

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							sustainable travel and recreation. This will build upon a local neighbourhood concept; · New movement corridors to help address existing tra)ic and associated environmental issues within Coventry and aligning with ongoing infrastructure improvements in the area, improving access to the University with the potential to facilitate access to the HS2 interchange at Arden Cross;		

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							· Ensuring development avoids coalescence between settlements through keeping development to the North of HS2; and · Strong connectivity to Coventry and the University of Warwick's main campus, supporting its role as a Major Investment Site Overall, the proposals represent a highly sustainable option growth option that can deliver a range of substantial benefits.		

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							Whilst it will be a matter for the SWLP to comprehensively consider the substantial benefits that can be delivered through large scale growth at Westwood Heath through a strategic growth corridor, it is considered that there will be substantial benefits to Coventry City through development in this location. Whilst this will be a matter for the Duty to Cooperate it is noted that paragraph 11a of the NPPF states		

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							that plans should positively seek opportunities to meet the development needs of their area. Therefore, it is considered that this local plan review should reaffirm Coventry City Council's support for growth south of Coventry, specifically at Westwood Heath.		
Newton LDP (ID381)	H1: 6.1			N	Y	Policy H1 – Housing Land Requirements The policy is not positively prepared, justified or consistent with the NPPF. It is therefore not Sound. The policy identifies a housing requirement of 29,100 over the plan period, which is 1,455 per annum. During the period from 2021 – 2024, (prior to the plan being adopted) there were 7,351	The previous 7,351 completions should be removed from the supply figure. The housing requirement does not satisfy the Government's	The plan period starting in 2021 is robust as it aligns to the evidence base (HEDNA and Census 2021). A retrospective start	No change

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						completions, which is 2,450 per year. This figure is 2,986 completions in excess of the identified need for this period. The inclusion of this supply prior to the Local Plan being adopted means that the housing land requirement for the fifteen-year period from 2026 – 2041 is understated and not sound. This is at odds with the NPPF and does not satisfy the Governments objective to significantly boost the supply of homes. Affordability issues in Coventry are such that the HEDNA calculates an affordable need of approximately 2,000 affordable dwellings per annum in Coventry. Addressing this overwhelming social issue, will require a significant uplift on the HEDNA's calculation of 1,964 dwellings per annum, even prior to the Council's removal of the 35% 'urban uplift'. Notwithstanding the fact that the HEDNA uses outdated economic growth forecasts from Cambridge Econometrics dating back to 2021, it still identifies 551 hectares of logistics floorspace being required across the housing market area to 2041. The location of this land has not yet been confirmed and as such the job creation has not been factored into the HEDNA housing requirement.	objective to significantly boost the supply of homes. The Local Plan must allocate sufficient sites to help address the identified affordable housing need as referred to in the HEDNA. Factor in realistic economic growth forecasts and associated job creation into the housing requirement.	date is normal practice. The Council considers it will have 15 years looking forward from adoption in line with the NPPF and the LDS will be amended prior to submission to demonstrate this. The evidence base is robust and ensures better delivery of the housing need as it allows increases to density across the city; the lowering of the AH threshold	

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						We are aware of more up to date evidence which suggests that there is demand for over 150 hectares of Industrial & Logistics space within Coventry over a 25 year period, generating an Unmet Need of approximately 85 hectares. This job growth must be considered and factored into the housing need for Coventry, else the Local Plan housing requirement will be flawed.		across most of the city; and for the housing mix to align to the HEDNA.	
CPRE (ID12)	H1					The Plan applies the output from the HEDNA (2022) and proposes Local Housing Need for Coventry for the period 2021-2041 as 29,100 houses (1,455 per annum). The HEDNA covers Coventry and the five Districts of Warwickshire. However, for the Warwickshire Districts notably Warwick and Stratford-upon-Avon, which are at Reg.18 stage, new (Dec 2024) NPPF policy requires the use of annual housing numbers using the new standard methodology ('NSM') which are on a different basis. This is all the more justified because the differences between old Standard Method (SM) and the NSM balance Coventry against the 5 Districts closely: <i>Dwellings per annum (DPA)</i>	Policy H1 should be amended to state: Policy H1: Housing Land Requirements 1. Provision will be made for 27,760 additional dwellings between 2021 and 2041. 2. Some of the housing requirements of the adjacent Districts in the Housing Market Area will be met from the surplus of	The exceptional circumstances to use the HEDNA and census 2021, given the significant discrepancies in the 2014 based SM for Coventry, is robust and an appropriate approach under the Transitional Arrangements (2023 NPPF).	No change

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						Coventry old SM: 3082 NSM: 1388 - 1694 Warwickshire (all 5 Districts) old SM: 2315 NSM: 3907 +1592 The HEDNA and the supplementary Review of Coventry's Housing Need (June 2024) conclude that the annual housing requirement for Coventry is 1455 houses (para 3.9). This is very similar to the NSM's target (1388). There is joint working on housing requirements between Coventry and the Warwickshire Districts and the Duty to Cooperate requires this. Using two different methodologies for the one Housing Market Area and sub-region is not justified. The housing need for Coventry should be 1,388 dpa; for the Plan Period 27,760 dwellings (not 29,100). Housing supply There is a surplus of supply of housing land in the City. Table 6.1 <i>Components of Housing Supply 2021-2041</i> states that supply is 31,493. This is a surplus of 3,730 against the Housing Need that the NSM projects for Coventry (27,760).	housing land supply in the Plan. This will be agreed with the adjacent authorities. 3.	The Council does not see a need to delay delivery of the plan given it has up-to-date evidence that it is confident in. The Local Plan is not proposing to accommodate allocations from neighbouring HMA authorities. No requests have been received and the Council cannot delay its plan for those whose local plans are at an earlier stage.	

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						Detailed assessment for Keep Our Green Belt Green (KOGG) shows that supply is significantly underestimated. Densities are likely to be higher, windfalls are underestimated by 50%, and the supply of student accommodation (PBSA) is underestimated. The windfall allowance in Table 6.1 should be adjusted from 2,800 to 5,600 and windfall from PBSA development of 1,400 should be added. The total supply is thus 35,693 in the Plan Period (2021-2041). Coventry's Local Plan has a potential surplus of 7,933 homes. The Plan will have capacity for 35,693 homes and a need under the NSM of 27,760. Some sites in the Plan which are damaging and do not have any planning permission should be de-allocated, in Keresley Parish (Proposal H2.1 Keresley SUE). This could reduce the surplus by @1,000. The Warwickshire Districts have a housing requirement which is above their supply (notably the South Warwickshire Plan, and Rugby). Coventry can provide for some of the housing numbers specified for them in the NSM. About 7,000 houses to meet the			

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						needs of adjacent Districts can be delivered on the land that is not required for Coventry's needs. Policy H1 should be amended to state: Policy H1: Housing Land Requirements 1. Provision will be made for 27,760 additional dwellings between 2021 and 2041. 2. Some of the housing requirements of the adjacent Districts in the Housing Market Area will be met from the surplus of housing land supply in the Plan. This will be agreed with the adjacent authorities. 3. The report to Keep Our Green Belt Green 'Coventry Plan: Housing' (February 2025) gives full details in support of this proposed change to Policy H1. Confirmation of supply in excess of requirement using HEDNA Housing requirement			

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						Even using the HEDNA projected annual housing requirement of 1455 dpa and 29,100 homes in the Plan Period 2021-2041, there is a housing land supply surplus of 2,850. This is stated in the Reg.19 Plan at p44, para 6.10: 6.9 6.10 The HEDNA identifies a local housing need of 1,455 per annum over the plan period, 29,100 in total. Following a thorough consideration of sustainable development principles and in accordance with the NPPF, an assessment of land options through the Call for Sites and the HELAA and a density study informing a strategy of increased densification a capacity of around 31,954 homes has been identified, which provides a degree of flexibility above the local need figure of 29,100."			
Holt Property Limited (on behalf of	H1			N	N	Policy H1 – Housing Land Requirements Not Sound As set out in response to Policy DS1, it is considered that the Plan period and housing requirement set out are unsound on the basis of not being positively prepared, justified, or consistent with national policy. Policy H1 1. should be amended in line with amendments with Policy DS1.	Policy H1: Housing Land Requirements To ensure Policy H1 is sound, the following modifications are required:	The plan period starting in 2021 is robust as it aligns to the evidence base (HEDNA and Census 2021). A retrospective start	Delivery on identified sites and in the trajectory to be modified based on

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land owner of land off Pickford Green Lane) (ID20)						- Policy H1 2. states the housing requirement is to be delivered in line with the trajectory set out in Appendix 3. The Council should ensure that committed supply is 'Developable' in line with the NPPF Glossary and set out a detailed trajectory illustrating expected delivery rates. This is particularly important for sites with outline planning permission not commenced, and on all sources of supply where they may be questions marks over deliverability or viability which need to be appropriately evidenced. - Notwithstanding this, it is noted that no account is taken of the likelihood that not all committed supply not started will come forward, with planning permissions inevitably expiring often due to unforeseen or a change in circumstances before they are commenced. No evidence is provided of historic lapse rates in the City, and an appropriate lapse rate needs to be applied to committed supply not started to ensure it is robust. A minimum 5% lapse rate is considered appropriate. - Turning to 2017 Local Plan Allocations, it is noted that no progress has been made on some sites which are allocated and proposed to be carried forward. This raises deliverability concerns. - It isn't clear how this is being accounted for in the HELAA, but in some cases sites are referenced in more than one element of supply, for example where a site is a carried forward allocation but also has consent. Clarity should be X 9 provided on this point, and the Council	1. Align the Housing Requirement with Policy DS1 The Plan period and housing requirement are unsound, as they are not positively prepared, justified, or consistent with national policy. Policy amendment required: Policy H1 must align with Policy DS1's required modifications, increasing the housing requirement to 1,964 dpa, reflecting actual need. 10 Justification: The Coventry & Warwickshire	date is normal practice. The Council considers it will have 15 years looking forward from adoption in line with the NPPF and the LDS will be amended prior to submission to demonstrate this. The sites that make up the trajectory in Appendix 3 and the 5YHLS have been prepared in full accordance with national policy and guidance and details can be	latest information acquired and from discussions with site promoters and developers.

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						should ensure no sites are being double counted in the supply as a result. - As set out in response to Policy H2, there are a number of proposed new allocations which aren't considered to meet the definition of Developable as set out in the NPPF Glossary, totalling 730 dwellings. - Taking all of the above into account, it is clear that the housing requirement will therefore not be delivered in line with the trajectory in Appendix 3. Policy H1 2. and Appendix 3 should be amended to ensure sufficient sites are identified to meet the housing requirement. - Furthermore, Policy H1 3. is not consistent with national policy. Appendix 3 sets out an annualised housing trajectory by category of supply, but no trajectory is provided which illustrates what the expected site-by-site breakdown of this is. As such, it is not possible to interrogate this in any detail. This is particularly important as the Plan will be required to demonstrate a Five-Year Housing Land Supply of deliverable sites at the point of Adoption (NPPF Paragraph 69 a)). It is noted that Appendix 3 provides the expected position as of 2024/25, but clearly the Plan will not be adopted during the 2024/25 monitoring year. - It is also noted there is a significant level of commitments with outline permission in the five-year period (taken from 2025/26 or	HEDNA (2022) identifies a minimum need of 1,964 dpa, which the Plan fails to meet. The 35% reduction applied to the Standard Method uplift is unjustified, contradicting NPPF Paragraph 60, which requires Local Plans to significantly boost housing supply. 2. Ensure All Housing Supply Meets NPPF 'Developable' Definition Policy H1 2. relies on a housing trajectory (Appendix 3) that	found in the Council's HELAA and 5YHLS Position Statement. They are constantly reviewed and an updated position will be offered at examination. In terms of identifying / having consideration of the city's lapse rate, the housing supply figure applies a buffer and so is a robust position.	

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						2026/27 as the base date), which are unlikely to meet the definition of Deliverable as set out in the NPPF Glossary unless clear evidence that housing completions will begin on site within five years is available. Without the site-by-site breakdown, it is not possible to conclude the Plan is consistent with NPPF Paragraph 69 a)	lacks evidence supporting the deliverability of committed sites. Policy amendment required: Provide a detailed trajectory for committed supply. Apply a 5% lapse rate to sites without confirmed start dates. Justification: NPPF Glossary defines 'Developable' as sites with a realistic prospect of delivery. Without a clear trajectory and lapse rate analysis, the Plan overestimates housing delivery.		

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							3. Remove Housing Allocations That Are Not 'Developable' The Plan includes multiple sites that lack progress or are constrained by existing land uses. Policy amendment required: Remove the sites which do not meet the NPPF definition of 'Developable'. Justification: HELAA assessments highlight deliverability concerns, and no evidence exists of landowner intent to bring these sites forward.		

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							4. Provide a Site-Specific Trajectory for Appendix 3 Appendix 3 lacks a site-by-site breakdown, making it impossible to verify whether the Plan meets the Five-Year Housing Land Supply requirement. Policy amendment required: Provide a detailed trajectory specifying delivery timelines, particularly for outline planning permissions. Justification: NPPF Paragraph 69(a) requires Plans to demonstrate a Five-		

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							Year Housing Land Supply at adoption. Without a site-specific breakdown, the Plan is unsound. Conclusion Without these modifications, Policy H1 is unsound and does not comply with NPPF Paragraph 35. The proposed changes will ensure that: • The housing requirement aligns with Policy DS1 and meets identified need. • Committed sites meet the NPPF		

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							definition of 'Developable'. • Undeliverable allocations are removed. • A clear trajectory is provided for Appendix 3. • To ensure a robust and deliverable housing supply trajectory, the Council should allocate Land off Pickford Green Lane, Coventry, which is free from major constraints, available immediately, and capable of delivering new homes within the first five years of the Plan. Unlike		

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							some allocated sites, which have uncertain viability or infrastructure requirements, this site can provide certainty in housing delivery. To support the Plan's overall soundness, the Council should allocate Land off Pickford Green Lane, Coventry, as it is immediately available, well-connected, and free from major constraints. The site can contribute to short-term housing supply, providing a		

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							viable and deliverable alternative to sites with uncertain development timelines. These modifications are necessary to ensure Policy H1 is positively prepared, justified, and effective.		
Holt Property Limited (on behalf of land own	H1			N	N	Policy H1 – Housing Land Requirements Not Sound - As set out in response to Policy DS1, it is considered that the Plan period and housing requirement set out are unsound on the basis of not being positively prepared, justified, or consistent with national policy. Policy H1 1. should be amended in line with amendments with Policy DS1. - Policy H1 2. states the housing requirement is to be delivered in line with the trajectory set out in Appendix 3. The Council should ensure that committed supply is 'Developable' in line with the NPPF	Policy H1: Housing Land Requirements To ensure Policy H1 is sound, the following modifications are required:	The plan period starting in 2021 is robust as it aligns to the evidence base (HEDNA and Census 2021). A retrospective start date is normal practice.	Delivery on identified sites and in the trajectory to be modified based on latest informatio

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er at Hawkes Mill Lane (ID20)						Glossary and set out a detailed trajectory illustrating expected delivery rates. This is particularly important for sites with outline planning permission not commenced, and on all sources of supply where they may be questions marks over deliverability or viability which need to be appropriately evidenced. - Notwithstanding this, it is noted that no account is taken of the likelihood that not all committed supply not started will come forward, with planning permissions inevitably expiring often due to unforeseen or a change in circumstances before they are commenced. No evidence is provided of historic lapse rates in the City, and an appropriate lapse rate needs to be applied to committed supply not started to ensure it is robust. A minimum 5% lapse rate is considered appropriate. - Turning to 2017 Local Plan Allocations, it is noted that no progress has been made on some sites which are allocated and proposed to be carried forward. This raises deliverability concerns. - It isn't clear how this is being accounted for in the HELAA, but in some cases sites are referenced in more than one element of supply, for example where a site is a carried forward allocation but also has consent. Clarity should be provided on this point, and the Council should ensure no sites are being double counted in the supply as a result.	1. Align the Housing Requirement with Policy DS1 The Plan period and housing requirement are unsound, as they are not positively prepared, justified, or consistent with national policy. Policy amendment required: Policy H1 must align with Policy DS1's required modifications, increasing the housing requirement to 1,964 dpa, reflecting actual need. Justification: The Coventry & Warwickshire HEDNA (2022)	The Council considers it will have 15 years looking forward from adoption in line with the NPPF and the LDS will be amended prior to submission to demonstrate this. The sites that make up the trajectory in Appendix 3 and the 5YHLS have been prepared in full accordance with national policy and guidance and details can be found in the Council's HELAA and 5YHLS Position	n acquired and from discussions with site promoters and developers.

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						• As set out in response to Policy H2, there are a number of proposed new allocations which aren't considered to meet the definition of Developable as set out in the NPPF Glossary, totalling 730 dwellings. • Taking all of the above into account, it is clear that the housing requirement will therefore not be delivered in line with the trajectory in Appendix 3. Policy H1 2. and Appendix 3 should be amended to ensure sufficient sites are identified to meet the housing requirement. • Furthermore, Policy H1 3. is not consistent with national policy. Appendix 3 sets out an annualised housing trajectory by category of supply, but no trajectory is provided which illustrates what the expected site-by-site breakdown of this is. As such, it is not possible to interrogate this in any detail. This is particularly important as the Plan will be required to demonstrate a Five-Year Housing Land Supply of deliverable sites at the point of Adoption (NPPF Paragraph 69 a)). It is noted that Appendix 3 provides the expected position as of 2024/25, but clearly the Plan will not be adopted during the 2024/25 monitoring year. • It is also noted there is a significant level of commitments with outline permission in the five-year period (taken from 2025/26 or 2026/27 as the base date), which are unlikely to meet the definition of Deliverable as set out in the NPPF Glossary unless clear evidence that housing completions will begin on site within five years is	identifies a minimum need of 1,964 dpa, which the Plan fails to meet. 10 The 35% reduction applied to the Standard Method uplift is unjustified, contradicting NPPF Paragraph 60, which requires Local Plans to significantly boost housing supply. 2. Ensure All Housing Supply Meets NPPF 'Developable' Definition Policy H1 2. relies on a housing trajectory (Appendix 3) that lacks evidence	Statement. They are constantly reviewed and an updated position will be offered at examination. In terms of identifying / having consideration of the city's lapse rate, the housing supply figure applies a buffer and so is a robust position.	

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Res ponde nt / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						available. Without the site-by-site breakdown, it is not possible to conclude the Plan is consistent with NPPF Paragraph 69 a).	supporting the deliverability of committed sites. Policy amendment required: Provide a detailed trajectory for committed supply. Apply a 5% lapse rate to sites without confirmed start dates. Justification: NPPF Glossary defines 'Developable' as sites with a realistic prospect of delivery. Without a clear trajectory and lapse rate analysis, the Plan overestimates housing delivery.		

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							3. Remove Housing Allocations That Are Not 'Developable' The Plan includes multiple sites that lack progress or are constrained by existing land uses. Policy amendment required: Remove the sites which do not meet the NPPF definition of 'Developable'. Justification: HELAA assessments highlight deliverability concerns, and no evidence exists of landowner intent to bring these sites forward.		

Local Plan Review

Regulation 19: Summary of Representations

Respon- dent / organi- sation / agen- t	Sec- tion	Com- plies with Duty to Coop- erate Y/N	Leg- ally Com- p- lian- t? Y/ N	Sou- nd Y/ N	Does respon- dent wish to appea- r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							4. Provide a Site-Specific Trajectory for Appendix 3 Appendix 3 lacks a site-by-site breakdown, making it impossible to verify whether the Plan meets the Five-Year Housing Land Supply requirement. Policy amendment required: Provide a detailed trajectory specifying delivery timelines, particularly for outline planning permissions. Justification: NPPF Paragraph 69(a) requires Plans to		

Local Plan Review

Regulation 19: Summary of Representations

Res ponde nt / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							demonstrate a Five-Year Housing Land Supply at adoption. Without a site-specific breakdown, the Plan is unsound. Conclusion Without these modifications, Policy H1 is unsound and does not comply with NPPF Paragraph 35. The proposed changes will ensure that: • The housing requirement aligns with Policy DS1 and meets identified need. • Committed sites meet the NPPF		

Local Plan Review

Regulation 19: Summary of Representations

Res ponde nt / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							definition of 'Developable'. • Undeliverable allocations are removed. • A clear trajectory is provided for Appendix 3. • Additional sustainable sites, such as Land to the rear of 147 Hawkes Mill Lane, Coventry, are considered to strengthen housing supply certainty and ensure deliverability. To support the Plan's overall soundness, the Council should allocate Land to the rear of 147 Hawkes		

Local Plan Review

Regulation 19: Summary of Representations

Res ponde nt / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							Mill Lane, Coventry, as it is immediately available, well connected, and free from major constraints. The site can contribute to short-term housing supply, providing a viable and deliverable alternative to sites with uncertain development timelines. These modifications are necessary to ensure Policy H1 is positively prepared, justified, and effective.		

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Holt Property Limited (on behalf of land owner at Pickford Grange (ID20))	H1			N	N	Policy H1 – Housing Land Requirements Not Sound - As set out in response to Policy DS1, it is considered that the Plan period and housing requirement set out are unsound on the basis of not being positively prepared, justified, or consistent with national policy. Policy H1 1. should be amended in line with amendments with Policy DS1. - Policy H1 2. states the housing requirement is to be delivered in line with the trajectory set out in Appendix 3. The Council should ensure that committed supply is 'Developable' in line with the NPPF Glossary and set out a detailed trajectory illustrating expected delivery rates. This is particularly important for sites with outline planning permission not commenced, and on all sources of supply where there may be questions marks over deliverability or viability which need to be appropriately evidenced. - Notwithstanding this, it is noted that no account is taken of the likelihood that not all committed supply not started will come forward, with planning permissions inevitably expiring often due to unforeseen or a change in circumstances before they are commenced. No evidence is provided of historic lapse rates in the City, and an appropriate lapse rate needs to be applied to committed supply not started to ensure it is robust. A minimum 5% lapse rate is considered appropriate.	Policy H1: Housing Land Requirements To ensure Policy H1 is sound, the following modifications are required: 1. Align the Housing Requirement with Policy DS1 The Plan period and housing requirement are unsound, as they are not positively prepared, justified, or consistent with national policy. Policy amendment required: Policy H1 must align with Policy DS1's required modifications,	The plan period starting in 2021 is robust as it aligns to the evidence base (HEDNA and Census 2021). A retrospective start date is normal practice. The Council considers it will have 15 years looking forward from adoption in line with the NPPF and the LDS will be amended prior to submission to demonstrate this. The sites that make up the trajectory in	Delivery on identified sites and in the trajectory to be modified based on latest information acquired and from discussions with site promoters and developers.

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						- Turning to 2017 Local Plan Allocations, it is noted that no progress has been made on some sites which are allocated and proposed to be carried forward. This raises deliverability concerns. - It isn't clear how this is being accounted for in the HELAA, but in some cases sites are referenced in more than one element of supply, for example where a site is a carried forward allocation but also has consent. Clarity should be X 9 provided on this point, and the Council should ensure no sites are being double counted in the supply as a result. - As set out in response to Policy H2, there are a number of proposed new allocations which aren't considered to meet the definition of Developable as set out in the NPPF Glossary, totalling 730 dwellings. - Taking all of the above into account, it is clear that the housing requirement will therefore not be delivered in line with the trajectory in Appendix 3. Policy H1 2. and Appendix 3 should be amended to ensure sufficient sites are identified to meet the housing requirement. - Furthermore, Policy H1 3. is not consistent with national policy. Appendix 3 sets out an annualised housing trajectory by category of supply, but no trajectory is provided which illustrates what the expected site-by-site breakdown of this is. As such, it is not possible to interrogate this in any detail. This is particularly important as the	increasing the housing requirement to 1,964 dpa, reflecting actual need. 10 Justification: The Coventry & Warwickshire HEDNA (2022) identifies a minimum need of 1,964 dpa, which the Plan fails to meet. The 35% reduction applied to the Standard Method uplift is unjustified, contradicting NPPF Paragraph 60, which requires Local Plans to significantly boost housing supply.	Appendix 3 and the 5YHLS have been prepared in full accordance with national policy and guidance and details can be found in the Council's HELAA and 5YHLS Position Statement. They are constantly reviewed and an updated position will be offered at examination. In terms of identifying / having consideration of the city's lapse rate, the housing supply figure	

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Plan will be required to demonstrate a Five-Year Housing Land Supply of deliverable sites at the point of Adoption (NPPF Paragraph 69 a)). It is noted that Appendix 3 provides the expected position as of 2024/25, but clearly the Plan will not be adopted during the 2024/25 monitoring year. It is also noted there is a significant level of commitments with outline permission in the five-year period (taken from 2025/26 or 2026/27 as the base date), which are unlikely to meet the definition of Deliverable as set out in the NPPF Glossary unless clear evidence that housing completions will begin on site within five years is available. Without the site-by-site breakdown, it is not possible to conclude the Plan is consistent with NPPF Paragraph 69 a).	2. Ensure All Housing Supply Meets NPPF 'Developable' Definition Policy H1 2. relies on a housing trajectory (Appendix 3) that lacks evidence supporting the deliverability of committed sites. Policy amendment required: Provide a detailed trajectory for committed supply. Apply a 5% lapse rate to sites without confirmed start dates. Justification: NPPF Glossary defines 'Developable' as	applies a buffer and so is a robust position.	

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							sites with a realistic prospect of delivery. Without a clear trajectory and lapse rate analysis, the Plan overestimates housing delivery. 3. Remove Housing Allocations That Are Not 'Developable' The Plan includes multiple sites that lack progress or are constrained by existing land uses. Policy amendment required: Remove the sites which do not meet the NPPF definition of 'Developable'. Justification: HELAA		

Local Plan Review

Regulation 19: Summary of Representations

Respon- dent / organi- sation / agen- t	Sec- tion	Com- plies with Duty to Coop- erate Y/N	Leg- ally Com- p- lian- t? Y/ N	Sou- nd Y/ N	Does respon- dent wish to appea- r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							assessments highlight deliverability concerns, and no evidence exists of landowner intent to bring these sites forward. 4. Provide a Site-Specific Trajectory for Appendix 3 Appendix 3 lacks a site-by-site breakdown, making it impossible to verify whether the Plan meets the Five- Year Housing Land Supply requirement. Policy amendment required: Provide a detailed trajectory		

Local Plan Review

Regulation 19: Summary of Representations

Respon- dent / organi- sation / agen- t	Sec- tion	Com- plies with Duty to Coop- erate Y/N	Leg- ally Com- p- lian- t? Y/ N	Soun- d Y/ N	Does respon- dent wish to appea- r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							specifying delivery timelines, particularly for outline planning permissions. Justification: NPPF Paragraph 69(a) requires Plans to demonstrate a Five-Year Housing Land Supply at adoption. Without a site-specific breakdown, the Plan is unsound. Conclusion Without these modifications, Policy H1 is unsound and does not comply with NPPF Paragraph 35. The proposed changes will ensure that:		

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							• The housing requirement aligns with Policy DS1 and meets identified need. • Committed sites meet the NPPF definition of 'Developable'. • Undeliverable allocations are removed. • A clear trajectory is provided for Appendix 3. • To ensure a robust and deliverable housing supply trajectory, the Council should allocate Land off Pickford Grange Lane, Coventry,		

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							which is free from major constraints, available immediately, and capable of delivering new homes within the first five years of the Plan. Unlike some allocated sites, which have uncertain viability or infrastructure requirements, this site can provide certainty in housing delivery. To support the Plan's overall soundness, the Council should allocate Land off Pickford Grange Lane, Coventry, as it		

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							is immediately available, well-connected, and free from major constraints. The site can contribute to short-term housing supply, providing a viable and deliverable alternative to sites with uncertain development timelines. These modifications are necessary to ensure Policy H1 is positively prepared, justified, and effective		
Holt Property	H1			N		Policy H1 – Housing Land Requirements Not Sound	Policy H1: Housing Land Requirements	The plan period starting in 2021 is robust as it aligns	Delivery on identified sites and in

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Limited (on behalf of land owner of land east of Pickford Grange Lane) (ID20)						- As set out in response to Policy DS1, it is considered that the Plan period and housing requirement set out are unsound on the basis of not being positively prepared, justified, or consistent with national policy. Policy H1 1. should be amended in line with amendments with Policy DS1. - Policy H1 2. states the housing requirement is to be delivered in line with the trajectory set out in Appendix 3. The Council should ensure that committed supply is 'Developable' in line with the NPPF Glossary and set out a detailed trajectory illustrating expected delivery rates. This is particularly important for sites with outline planning permission not commenced, and on all sources of supply where they may be questions marks over deliverability or viability which need to be appropriately evidenced. - Notwithstanding this, it is noted that no account is taken of the likelihood that not all committed supply not started will come forward, with planning permissions inevitably expiring often due to unforeseen or a change in circumstances before they are commenced. No evidence is provided of historic lapse rates in the City, and an appropriate lapse rate needs to be applied to committed supply not started to ensure it is robust. A minimum 5% lapse rate is considered appropriate.	To ensure Policy H1 is sound, the following modifications are required: 1. Align the Housing Requirement with Policy DS1 The Plan period and housing requirement are unsound, as they are not positively prepared, justified, or consistent with national policy. Policy amendment required: Policy H1 must align with Policy DS1's required modifications, increasing the housing requirement	to the evidence base (HEDNA and Census 2021). A retrospective start date is normal practice. The Council considers it will have 15 years looking forward from adoption in line with the NPPF and the LDS will be amended prior to submission to demonstrate this. The sites that make up the trajectory in Appendix 3 and the 5YHLS have been prepared in full	the trajectory to be modified based on latest information acquired and from discussions with site promoters and developers.

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						- Turning to 2017 Local Plan Allocations, it is noted that no progress has been made on some sites which are allocated and proposed to be carried forward. This raises deliverability concerns. - It isn't clear how this is being accounted for in the HELAA, but in some cases sites are referenced in more than one element of supply, for example where a site is a carried forward allocation but also has consent. Clarity should be X 9 provided on this point, and the Council should ensure no sites are being double counted in the supply as a result. - As set out in response to Policy H2, there are a number of proposed new allocations which aren't considered to meet the definition of Developable as set out in the NPPF Glossary, totalling 730 dwellings. - Taking all of the above into account, it is clear that the housing requirement will therefore not be delivered in line with the trajectory in Appendix 3. Policy H1 2. and Appendix 3 should be amended to ensure sufficient sites are identified to meet the housing requirement. - Furthermore, Policy H1 3. is not consistent with national policy. Appendix 3 sets out an annualised housing trajectory by category of supply, but no trajectory is provided which illustrates what the expected site-by-site breakdown of this is. As such, it is not possible to interrogate this in any detail. This is particularly important as the	to 1,964 dpa, reflecting actual need. 10 Justification: The Coventry & Warwickshire HEDNA (2022) identifies a minimum need of 1,964 dpa, which the Plan fails to meet. The 35% reduction applied to the Standard Method uplift is unjustified, contradicting NPPF Paragraph 60, which requires Local Plans to significantly boost housing supply. 2. Ensure All Housing Supply	accordance with national policy and guidance and details can be found in the Council's HELAA and 5YHLS Position Statement. They are constantly reviewed and an updated position will be offered at examination. In terms of identifying / having consideration of the city's lapse rate, the housing supply figure applies a buffer and so is a robust position.	

Local Plan Review

Regulation 19: Summary of Representations

Respon- dent / orga- nisa- tion / agen- t	S- ec- ti- o- n	Com- plies with Duty to Coop- erate Y/N	Leg- ally Com- p- lian- t? Y/ N	Sou- nd Y/ N	Does respon- dent wish to appea- r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Plan will be required to demonstrate a Five-Year Housing Land Supply of deliverable sites at the point of Adoption (NPPF Paragraph 69 a)). It is noted that Appendix 3 provides the expected position as of 2024/25, but clearly the Plan will not be adopted during the 2024/25 monitoring year. It is also noted there is a significant level of commitments with outline permission in the five-year period (taken from 2025/26 or 2026/27 as the base date), which are unlikely to meet the definition of Deliverable as set out in the NPPF Glossary unless clear evidence that housing completions will begin on site within five years is available. Without the site-by-site breakdown, it is not possible to conclude the Plan is consistent with NPPF Paragraph 69 a).	Meets NPPF ‘Developable’ Definition Policy H1 2. relies on a housing trajectory (Appendix 3) that lacks evidence supporting the deliverability of committed sites. Policy amendment required: Provide a detailed trajectory for committed supply. Apply a 5% lapse rate to sites without confirmed start dates. Justification: NPPF Glossary defines ‘Developable’ as sites with a realistic prospect of delivery.		

Local Plan Review

Regulation 19: Summary of Representations

Respon dent / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							Without a clear trajectory and lapse rate analysis, the Plan overestimates housing delivery. 3. Remove Housing Allocations That Are Not 'Developable' The Plan includes multiple sites that lack progress or are constrained by existing land uses. Policy amendment required: Remove the sites which do not meet the NPPF definition of 'Developable'. Justification: HELAA assessments highlight		

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Regulation 19: Summary of Representations

Res p o n d e n t / o r g a n i s a t i o n / a g e n t	S e c t i o n	Com p l i e s w i t h D u t y t o C o o p e r a t e Y/N	Leg a l l y C o m p l i a n t ? Y/N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							deliverability concerns, and no evidence exists of landowner intent to bring these sites forward. 4. Provide a Site-Specific Trajectory for Appendix 3 Appendix 3 lacks a site-by-site breakdown, making it impossible to verify whether the Plan meets the Five-Year Housing Land Supply requirement. Policy amendment required: Provide a detailed trajectory specifying delivery timelines,		

Local Plan Review

Regulation 19: Summary of Representations

Respon- dent / organi- sation / agen- t	Sec- tion	Com- plies with Duty to Coop- erate Y/N	Leg- ally Com- p- lian- t? Y/ N	Soun- d Y/ N	Does respon- dent wish to appea- r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							particularly for outline planning permissions. Justification: NPPF Paragraph 69(a) requires Plans to demonstrate a Five-Year Housing Land Supply at adoption. Without a site-specific breakdown, the Plan is unsound. Conclusion Without these modifications, Policy H1 is unsound and does not comply with NPPF Paragraph 35. The proposed changes will ensure that:		

Local Plan Review

Regulation 19: Summary of Representations

Res ponde nt / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							• The housing requirement aligns with Policy DS1 and meets identified need. • Committed sites meet the NPPF definition of 'Developable'. • Undeliverable allocations are removed. • A clear trajectory is provided for Appendix 3. • To ensure a robust and deliverable housing supply trajectory, the Council should allocate Land East of Pickford Grange Lane, Coventry,		

Local Plan Review

Regulation 19: Summary of Representations

Res ponde nt / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							which is free from major constraints, available immediately, and capable of delivering new homes within the first five years of the Plan. Unlike some allocated sites, which have uncertain viability or infrastructure requirements, this site can provide certainty in housing delivery. To support the Plan's overall soundness, the Council should allocate Land East of Pickford Grange Lane, Coventry, as it		

Local Plan Review

Regulation 19: Summary of Representations

Respon- dent / organi- sation / agen- t	Sec- tion	Com- plies with Duty to Coop- erate Y/N	Leg- ally Com- p- lian- t? Y/ N	Sou- nd Y/ N	Does respon- dent wish to appea- r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							is immediately available, well-connected, and free from major constraints. The site can contribute to short-term housing supply, providing a viable and deliverable alternative to sites with uncertain development timelines. These modifications are necessary to ensure Policy H1 is positively prepared, justified, and effective.		

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Tetlow King Planning on behalf of the West Midlands Housing Association Planning Consortium	H1	N	N	N	N	<u>Policy H1: Housing Land Requirements</u> As noted previously, the Council's AMR (December, 2024) states that Coventry currently hold 2.59 years of supply, well below the required minimum of five years supply. This raises significant concerns about the city's ability to meet housing demand. Criterion 3 of draft Policy H1 states that "Housing land will be released in order to maintain a continuous 5 year supply of housing land in order to support a varied and flexible land supply to support housing delivery and sustainable development. This will be monitored through the Council's Annual Monitoring Report." While this commitment is noted, the Council has not provided a clear strategy for how land will be released across the city to ensure sustainable housing delivery throughout the plan period. Given the current shortfall in housing land supply, the WMHAPC seeks clarity on the specific mechanisms and strategy the Council intends to implement to address this issue. Without a well-defined approach, there is a risk that housing delivery will continue to fall short, exacerbating affordability challenges and limiting access to homes for residents in Coventry.	Refer to previous representation response	The Council has published its latest 5YHLS Position Statement which shows 5.6 years of supply. The sites that make up the trajectory in Appendix 3 and the 5YHLS have been prepared in full accordance with national policy and guidance and details can be found in the Council's HELAA and 5YHLS Position Statement. They are constantly reviewed and an updated position	Delivery on identified sites and in the trajectory to be modified based on latest information acquired and from discussions with site promoters and developers.

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
(ID63)								will be offered at examination.	
Marrons on behalf of Hallam Land (ID28)	H1			N	Y	Policy H1: Housing Land Requirements – Plan Period <u>Not Sound</u> 1. Policy H1 is not positively prepared, justified, or consistent with national policy. 2. Policy H1 1. defines the Plan period as 2021-2041. The Local Plan will not be adopted until at least 2026, five years into the Plan period. There is no justification for a Plan period that starts five years before the Plan is adopted, and there is no support for adopting such an approach in the NPPF or NPPG. 3. NPPF paragraph 21 requires strategic policies to look ahead over a minimum 15 year period. There is no requirement for strategic policies to also look backwards 5 years. 4. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement. 5. Policy H1 1. proposes a housing requirement of 1,455 dwellings per annum (dpa). In the period between 2021-2024, there were	Policy H1 1. should be amended with a minimum of 35,352 additional dwellings between 2024 to 2042 (1,964 dpa x 18 years), plus an uplift to address housing affordability in the City and a contribution to unmet needs from Birmingham and the Black Country. Appendix 3 should be amended to ensure the Plan demonstrates the updated housing requirement in line	The plan period starting in 2021 is robust as it aligns to the evidence base (HEDNA and Census 2021). A retrospective start date is normal practice. The Council considers it will have 15 years looking forward from adoption in line with the NPPF and the LDS will be amended prior to submission to demonstrate this.	Delivery on identified sites and in the trajectory to be modified based on latest information acquired and from discussions with site promoters and developers.

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						7,351 completions¹. Therefore, there were 2,986 completions in excess of the proposed Local Plan requirement (7,351 - 1,455 x 3). The inclusion of supply between 2021-2024 means that the housing requirement for the 15 years ahead from 2026-2041 will not be met (total capacity 31,493² – 7,666³ = 23,827 which is less than the minimum of 24,007⁴ homes required). This is irrespective of whether the identified sites and unidentified sites deliver as expected. 6. The NPPF paragraph 60 clearly states the Government's objective is to significantly boost the supply of homes. That has not changed with the change in Government. By adopting a Plan period that looks back 5 years, the Council is manipulating the figures to avoid meeting the housing needs of the City. 7. Further to the above point, Policy H1 1. only plans to 2041. NPPF Paragraph 22 is clear that Local Plans should look ahead over a <u>minimum</u> 15-year period from adoption. Whilst it is possible that the Plan will be adopted in 2026, it is considered prudent to extend the Plan Period beyond 2041 to 2042 to ensure compliance with NPPF in the event the Examination takes longer than envisaged. Policy H1: Housing Land Requirements – Housing Requirement <u>Not Sound</u>	with representations made above can be met (along with 5 year supply on adoption) with an appropriate buffer.	The Council's justification for its need figure is set out in the growth needs and housing background papers. In terms of the employment figures these have been updated through the alignment paper. Affordable housing is maximised through the viability evidence base, e.g. lowering of the threshold for when sites are	

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Regulation 19: Summary of Representations

Res p o n d e n t / o r g a n i s a t i o n / a g e n t	S e c t i o n	Com p l i e s w i t h D u t y t o C o o p e r a t e Y/N	Leg a l l y C o m p l i a n t? Y/N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						8. Policy H1 1. also specifies the minimum housing requirement as 29,100 (1,455 dpa). This is based on the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022), minus 10,180 dwellings (509 dpa) based on removing 35%. The removal of 35% is a reference to the 'urban uplift' which should be applied to the Local Housing Need calculation using the Standard Method, and not the HEDNA method of calculating housing need. 9. Whilst the HEDNA approach to determining the appropriate level of housing growth to be planned for in Coventry is considered acceptable in principle, concerns are raised in the attached Housing Need Evidence Base Review relating to the future job growth forecasts used in preparing the HEDNA being unduly pessimistic. 10. The HEDNA uses the Cambridge Econometrics (CE) March 2021 baseline economic growth forecast. This forecast was prepared during the COVID-19 lockdown when economic growth was far from certain and was informed by uncertain economic conditions. The CE forecast is for 0.44% per annum growth (820 jobs per annum) in Coventry over the CLPR Plan period, less than the 1.0% per annum growth (equivalent to 1,995 jobs per annum) experienced since 1981, and growth of over 2% per annum between 2011 and 2019		required to provide affordable housing. Coventry is a constrained city which sits within its own HMA and therefore taking the Greater Birmingham HMA shortfall is not reasonable. The sites that make up the trajectory in Appendix 3 and the 5YHLS have been prepared in full accordance with national policy and guidance and details can be found in the	

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						(3,338 jobs per annum). The CE forecasts were also based on 3.6% GDP in 2021 and a 2.8% increase in GDP in 2022. Reference to the ONS' December 2022 GDP monthly estimate report states how GDP is estimated to have grown by 4.0% in 2022, following growth of 7.6% in 2021. 11. Furthermore, the HEDNA identifies how 551 hectares of logistics floorspace is needed across the housing market area to 2041. However, the location for this land has not been confirmed and so the job growth associate it has not been considered. 12. As a minimum, the attached Housing Need Evidence Base Review considers that 1.0% growth since 1981 should be assumed, which aligns with the 1,964 dwellings per annum established by the HEDNA and emphasises how the housing requirement of 1,455 dwellings per annum is inadequate. This is particularly important given the recognised shortfall in employment land supply of circa 45ha (Paragraph 3.15 of the Proposed Submission), with the deficit in employment land supply likely to be even greater than reported. 13. It is important also to remember that local housing need is not the same as the housing requirement to be set out in the Local Plan. The HEDNA derived figure of 1,964 dwellings per annum represents		Council's latest HELAA and 5YHLS Position Statement. They are constantly reviewed and an updated position will be offered at examination. In terms of identifying / having consideration of the city's lapse rate, the housing supply figure applies a buffer and so is a robust position. The evidence base confirms the council's approach	

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						the minimum number of homes needed, and the Council should consider whether it is appropriate to set a higher housing requirement in line with national guidance⁵; for example in order to address a significant affordable housing shortfall, support economic development or address strategic infrastructure requirements which are likely to increase the number of homes needed. 14. As set out in the attached Housing Need Evidence Base Review, the HEDNA describes affordable housing need across the HMA as “clearly acute” and identifies a “notable need” for affordable housing. It also states how it is clear that provision of new affordable housing is an “important and pressing issue in the area”. Figure 8 of the AMR 2023/24 shows that 2,933 affordable homes have been delivered since 2011 compared to a Local Plan requirement of 4,176 dwellings for the same period. 15. The HEDNA calculates significantly higher affordable need in CCC of approximately 2,000 affordable dwellings per annum. This reflects the Council’s waiting list (over 13,000 households), a 68% increase in the number of households in temporary accommodation in only 24 months, a 114% increase in only five years in the number of households who are homeless and owed a relief duty, and the fact that Coventry has the 12th highest ratio of 5 Paragraph: 010		to windfall is justified and sound.	

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						Reference ID: 2a-010-20201216 of National Planning Practice Guidance homeless households per 1,000 population of over 300 local authorities in England. 16. Addressing affordable housing need in any meaningful way will require an uplift to the HEDNA's calculation of 1,964 dwellings per annum. 17. Further consideration will also need to be given to unmet needs within and adjacent to the Housing Market Area in line with the Duty to Cooperate and the positively prepared test of soundness. There are clearly significant unmet housing needs arising from Birmingham and the Black Country in particular which require addressing in this Plan. <i>Birmingham and the Black Country</i> 18. There are strong functional relationships between Birmingham, the Black Country and Coventry, in terms of transport connections and commuting patterns, and development in Coventry can contribute towards meeting unmet needs. As set out in the Birmingham HENDA (2022) at Appendix 1 on Housing Market Area and Functional Economic Market Area, Coventry has one of the highest levels of migration flows with both Birmingham and the			

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						Black Country. Development in Coventry can contribute towards meeting unmet needs. Whilst in the past Coventry itself has declared unmet needs and not contributed to unmet needs in the HMA, that situation no longer exists. 19. The most recent Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Position Statement Addendum was published in April 2023, reporting a total shortfall of some 106,654 dwellings arising from the GBBCHMA with total contributions of only 18,181 dwellings committed. However, this is now out-of-date on account of Local Plan progress and revisions to the calculation of Local Housing Need derived from the Standard Method. It is understood that work is underway to update the Position Statement to 2025, and we still expect this work to identify a significant deficit in supply across the HMA as explained below. <i>Birmingham</i> 20. There are strong functional relationships between Birmingham and Coventry and the relationships across the wider area should be understood including the relationship between homes and jobs as a Functional Economic Market Area.			

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						21. It is recognised that the shortfall arising from Birmingham is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum given the Local Housing Need derived from the Standard Method has decreased to 4,448 dwellings per annum. Indeed, based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Birmingham Local Plan period 2020 to 2042 and comparing with reported supply in the Birmingham Local Plan Preferred Options (July 2024), the shortfall arising from Birmingham will have been eradicated. <i>Dudley</i> 22. The Dudley Local Plan was subject to Regulation 19 consultation in October and November 2024. It reports a housing need of 11,169 dwellings in the Plan period 2024 to 2041 with supply of 10,470 dwellings, resulting in a shortfall of 699 dwellings to be exported through the Duty to Cooperate. 23. It is noted that the housing requirement is based on the Local Housing Need derived from the previous Standard Method of 657 dwellings per annum; this has now increased significantly to 1,462 dwellings per annum.			

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						24. Should the Dudley Local Plan be submitted for Examination before 12th March 2025 it will be captured by the transitional arrangements set out in the NPPF and able to continue on the basis of the lower Local Housing Need derived from the previous Standard Method. However, should the Dudley Local Plan not progress to Examination before 12th March 2025, the Council will be required to utilise the increased Local Housing Need derived from the Standard Method for plan-making. Based on applying the Council's Local Housing Need derived from the Standard Method to the emerging Dudley Local Plan period 2024 to 2041 and comparing with reported supply in the Dudley Local Plan Publication Plan (October 2024), the shortfall arising from Dudley would increase to some 14,384 dwellings. <i>Sandwell</i> 25. The Sandwell Local Plan was submitted for Examination in December 2024. It reports a supply of 10,434 dwellings compared with a housing need of 26,350 dwellings in the Plan period 2024 to 2041, resulting in a shortfall of some 15,916 dwellings to be exported through the Duty to Cooperate. 26. It is noted that Sandwell's Local Housing Need derived from the Standard Method has marginally reduced from 1,550 dwellings per			

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						annum to 1,346 dwellings per annum, however given the stage of preparation of the Sandwell Local Plan it is captured by the transitional arrangements in the NPPF. In any case, the shortfall in supply in Sandwell is significant. <i>Walsall</i> 27. Further to the disbandment of the Black Country Plan in late 2022, Walsall council have not yet made notable progress on a new Local Plan, with Issues and Options consultation is expected in 2025. Given the shortfall reported in the Black Country Plan and the increase in Walsall's Local Housing Need derived from the Standard Method since (now 1,148 dwellings per annum), it is likely that there will continue to be a shortfall arising from Walsall that requires consideration. <i>Wolverhampton</i> 28. The Wolverhampton Local Plan was subject to Regulation 19 consultation in November 2024 to January 2025. It reports a housing need of 19,728 dwellings in the Plan period 2024 to 2042 with supply of 9,330 dwellings, resulting in a shortfall of some 10,398 dwellings to be exported through the Duty to Cooperate. <i>Contributions to Shortfall</i>			

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						29. The GBBCHMA Position Statement Addendum outlines contributions towards unmet needs committed at April 2023, however several of these commitments have now fallen away or been reduced. 30. 2,665 dwellings contribution from Lichfield are noted in the Position Statement Addendum, however the Lichfield Local Plan was withdrawn in October 2023. Initial work on a new Local Plan has commenced and was subject to Issues and Options consultation in October to December 2024. The Issues and Options document confirms commitment to the Duty to Cooperate but does not set a commitment to meeting unmet needs arising from the GBBCHMA. 31. 1,500 dwellings contribution from Shropshire are noted in the Position Statement Addendum. Whilst this is still maintained, the Shropshire Local Plan Review is currently under scrutiny at Examination with significant soundness concerns raised by the Inspectors. There is therefore potential for the Shropshire Local Plan Review to be withdrawn and the committed contribution to unmet needs to disappear. 32. 2,105 dwellings contribution from Solihull are noted in the Position Statement Addendum, however the Solihull Local Plan			

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						Review was withdrawn in October 2024, with no progress yet made on a new Local Plan. 33. 4,000 dwellings contribution from South Staffordshire are noted in the Position Statement Addendum, however this has been reduced to 640 dwellings in the South Staffordshire Local Plan submitted for Examination in December 2024. 34. The net result of the above is a reduction of some 8,130 dwellings in commitments to unmet needs arising from the GBBCHMA, with a further 1,500 dwellings committed also potentially falling away. 35. It is noted that the Telford and Wrekin Local Plan Review will be subject to Publication consultation from March 2025 and includes a commitment to 153 dwellings per annum towards unmet needs arising from the Black Country, however the total level of unmet needs to be met is not clear and it remains untested through Examination. <i>Conclusion on Unmet Needs</i> 36. Whilst the total shortfall in housing arising from Birmingham and the Black Country is likely to have reduced since the April 2023 GBBCHMA Position Statement Addendum, the shortfall is still			

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						significant. In addition, the level of committed contributions towards unmet needs has decreased. 37. There is no evidence that the Council have engaged with Birmingham and the Black Country authorities to determine an appropriate level of unmet needs to be directed to Coventry. That process should have been transparent in accordance with Paragraph 27 of the NPPF, and effective in accordance with Paragraph 35 c) of the NPPF. Policy H1: Housing Land Requirements – Housing Supply <u>Not sound</u> 38. Policy H1 2. states the housing requirement is to be delivered in line with the trajectory set out in Appendix 3. 39. Appendix 3 includes a significant level of completions since 2021/22 (7,666 dwellings) and committed supply (13,975 dwellings). As set out in the accompanying Housing and Economic Land Availability Assessment (HELAA, November 2024), committed supply comprises sites under construction (3,545 dwellings), sites with detailed planning permission not commenced (4,970 dwellings), sites with outline planning permission not commenced (5,314 dwellings) and permitted development (146 dwellings).			

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						40. The Council should demonstrate that committed supply is 'Developable' in line with the NPPF Glossary and set out a detailed trajectory illustrating expected delivery rates. This is particularly important for sites with outline planning permission not commenced, and on all sources of supply where they may be questions marks over deliverability or viability which need to be appropriately evidenced. 41. Notwithstanding this, it is noted that no account is taken of the likelihood that not all committed supply not started will come forward, with planning permissions inevitably expiring often due to unforeseen or a change in circumstances before they are commenced. No evidence is provided of historic lapse rates in the City, and an appropriate lapse rate needs to be applied to committed supply not started to ensure it is robust. A minimum 5% lapse rate is considered appropriate. Applying a 5% lapse rate to committed development not started would reduce the level of committed supply accounted for in the Plan to 13,454 dwellings. 42. Turning to 2017 Local Plan Allocations, it is noted that no progress has been made on H2:03 Walsgrave Hill Farm which is allocated and proposed to be carried forward for 900 dwellings.			

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						Indeed, the Council's own HELAA assessment of the site (HEN-002-24) raises deliverability concerns and suggests it is not available until 11+ years. Given the lack of progress made on the site since it was allocated eight years ago and concerns raised in the HELAA, it is considered that this site is not Developable in line with the NPPF Glossary definition and should not be carried forward. 43. Similarly, H2:16 Land at Carlton Road (85 dwellings) has not been progressed since its allocation in 2017 and indeed is an existing industrial site with current occupiers. No evidence is provided with regard to future intentions of occupiers or the landowner. H2:19 Land at Mitchell Avenue (50 dwellings) has also not been progressed since its allocation in 2017, neither has H2:20 Land at Durbar Avenue (45 dwellings) or H2:22 Land at Jardine Crescent (25 dwellings). These sites should also be removed as carried forward allocations as not Developable in line with the NPPF Glossary. 44. It isn't clear how this is being accounted for in the HELAA, but in some cases sites are referenced in more than one element of supply, for example where a site is a carried forward allocation but also has consent. Clarity should be provided on this point, and the Council should ensure no sites are being double counted in the supply as a result.			

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						45. Proposed new allocations are explored further in response to Draft Policy H2 Table 6.2 below. There are a number of proposed new allocations which aren't considered to meet the definition of Developable as set out in the NPPF Glossary, totalling 730 dwellings. 46. In addition to identified sites, the Plan is proposing to include in the overall supply a further 816 dwellings on 'other identified HELAA' sites and an additional 2,800 dwellings in windfall allowance. Justification for windfall allowance is provided in the HELAA which sets out that 200 dwellings per annum is considered appropriate, taking effect from 2027/28 to avoid double counting. This is justified on the basis of recent windfall delivery rates in the City. 47. NPPF Paragraph 72 is clear that <u>compelling evidence</u> is required to justify a windfall allowance, having regard to the HELAA, historic windfall delivery rates and <u>expected future trends</u>. The HELAA does not consider influences on future trends of windfall delivery in the City and therefore does not comply with NPPF Paragraph 72 in providing compelling evidence. 48. Given the lack of compelling evidence, it is considered that the proposed windfall allowance should be removed from anticipated			

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						supply. Furthermore, given there is no certainty around delivery of sites identified in the HELAA which are not allocated and do not have planning permission, including land availability and any significant infrastructure requirements or land remediation which means the sites cannot be viably delivered, this supply does not meet the definition of Developable as set out in the NPPF Glossary as should not be counted towards the CLPR supply as a result. 49. Notwithstanding this, it is considered likely that the inclusion of identified HELAA sites in addition to a windfall allowance is likely to be double counting, as inherently these identified HELAA sites would come forward as windfall development. 50. The implication of the above assessment is the Plan overestimates supply as follows: 51. The housing requirement will therefore not be delivered in line with the trajectory in Appendix 3 Policy H1: Housing Land Requirements – Five Year Supply <u>Not sound</u> 52. Policy H1. and Appendix 3 is not consistent with national policy.			

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						53. Appendix 3 sets out an annualised housing trajectory by category of supply, but no trajectory is provided which illustrates what the expected site-by-site breakdown of this is. As such, it is not possible to interrogate this in any detail. This is particularly important as the Plan will be required to demonstrate a Five-Year Housing Land Supply of deliverable sites at the point of Adoption (NPPF Paragraph 69 a)). It is noted that Appendix 3 provides the expected position as of 2024/25, but clearly the Plan will not be adopted during the 2024/25 monitoring year. 54. It is also noted there is a significant level of commitments with outline permission in the five-year period (taken from 2025/26 or 2026/27 as the base date), which are unlikely to meet the definition of Deliverable as set out in the NPPF Glossary unless clear evidence that housing completions will begin on site within five years is available. Without the site-by-site breakdown, it is not possible to conclude the Plan is consistent with national policy in paragraph 69 a). [1] Table 5 of the HELAA November 2024 [2] Total supply from Table 6.1 of the Proposed Submission Plan			

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						[3] Past net completions from Table 6.1 of the Proposed Submission Plan [4] Based on 1,455 dwellings per annum x 16.5 years (mid 2024 to 2041) [5] Paragraph: 010 Reference ID: 2a-010-20201216 of National Planning Practice Guidance [Officer note: See full representation for further details and tables]			
Stephen McNought (ID59)	H1		N	N	Y	The comments of Mark Sullivan of CPRE and Merle Gering are adopted in full. Please see attached document headed additional submissions for further submissions.	Please see submissions of Mark Sullivan for suggested wording. Please document headed additional submissions. Please see Gerald Kell's report. Policy H1 provisions should be for a minimum of 27,600	The conclusions referred to in the KOGG report are noted, however the council is confident in its evidence regarding the HEDNA figures, density assumptions and windfall figures. The Keresley SUE allocation figure has not been	Reinstate part c of Policy DS4.

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								changed as the figure is not set as a maximum and the site is now being delivered through the DM process. Part c of Policy DS4 was missing in error and will be reinstated.	
Home Builders Federation (ID21)	H1	N	N	N	Y	<u>Chapter 6. Delivering Coventry's Housing Needs</u> STRATEGIC POLICY, Policy H1: Housing Land Requirements <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 45. The Plan seeks to make provision for a minimum of 29,100 additional dwellings between 2021 and 2041.	Please refer to representation	The plan period starting in 2021 is robust as it aligns to the evidence base (HEDNA and Census 2021). A retrospective start date is normal practice.	Delivery on identified sites and in the trajectory to be modified based on latest information acquired

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						46. The HBF notes a new NPPF and new standard method for calculating housing need has been published just prior to this consultation on the Reg 19 version of the Coventry Local Plan, and that this may have implications for the production of the Plan and the policies it contains. The transitional arrangements set out in the NPPF⁶ state that <i>‘for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025 and its draft housing requirement meets at least 80% of local housing need; [or] the plan has been submitted for examination under Regulation 22 on or before 12 March 2025; [or] the plan includes policies to deliver the level of housing and other development set out in a preceding local plan adopted since 12 March 2020 . . .’</i> 47. Although this Plan will have reached Regulation 19 (pre-submission stage) on or before 12 March 2025, its draft housing requirement will not meet at least 80% of local housing need. The deviation from the standard method methodology, in particular the failure to include the urban uplift, results in a Plan that fails to deliver 80% of housing		The Council considers it will have 15 years looking forward from adoption in line with the NPPF and the LDS will be amended prior to submission to demonstrate this. The findings of the Green Belt Technical Update Study, which demonstrates the green belt areas in the city continue to serve Green Belt purposes very well, is robust and therefore no further green belt	and from discussions with site promoters and developers.

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						need as such it could not proceed under the Dec 2023 NPPF. As such HBF considers that as currently proposed the Plan will be expected to comply with the NPPF 2024. The Government Response to the proposed reforms to the NPPF and other changes to the Planning system consultation⁷ provides a helpful flow diagram of the transitional arrangements, which is copied (again) below [officer note - see full representation] 48. We note that if it the housing requirement was assessed against the NPPF 2024 housing requirement methodology then it may be that the annual requirement of it would be less than 80% below the requirements, but this is not the process. If a plan is to deliver the NPPF 2024 housing requirement calculations it needs to be progressed under the NPPF 20024, which would add further weight to our comments in relation to the Green Belt, which is one of the key areas of policy changes between the 2023 and the 2024 NPPF. 49. We have set out in detail our concerns about how the council has arrived at the Housing figure for the Coventry Plan in our response to STRATEGIC POLICY, Policy DS1:		is proposed to be released. The evidence base shows the city can accommodate its housing supply within its boundary on brownfield land. The exceptional circumstances to use the HEDNA and census 2021, given the significant discrepancies in the 2014 based SM for Coventry, is justified in the HEDNA and the housing and growth needs background papers.	

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						Overall Development Needs. These concerns apply equally to this policy, but in the interest of efficiency they are not repeated verbatim here, but for the avoidance of any doubt we disagree with the Housing Land Requirement and believe it should be higher. As such the Plan is unsound because it is not positively prepared, effective, justified or consistent with national policy. 50. HBF would also question the Plan period of this Plan. The NPPF states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. In recognition of the amount of time it can take to progress a new Local Plan through all its required stages, HBF consider it is unlikely that that this Plan would be adopted in 2025, and therefore suggests that the Council should consider extending the Plan period to ensure that a 15-year period is provided post adoption of the Plan. It will also be important for the evidence base to be consistent with the Plan Period.		The sites that make up the trajectory in Appendix 3 and the 5YHLS have been prepared in full accordance with national policy and guidance and are constantly reviewed and an updated position will be offered at examination. The plan is positively prepared given the evidence base ensures better deliver of the housing need as it allows increases to	

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						51. In relation to the policy wording itself, criteria one should clearly set out the housing requirement as both a full plan figure and an annual requirement. The annual requirement is essential for monitoring purposes and should be explicitly set out within the wording of the policy. Although HBF do not agree with the housing requirement figures for reasons set out elsewhere in our response, for the purpose of illustrating this particular point only, we would wish the wording of Criteria One should be changed to say “Provisions will be made for a minimum of 29,100 (1455 dpa) additional dwellings between 2021 and 2041.” We also note that the target is expressed in this within Appendix 8, the Monitoring Framework. 52. Criteria 2 of the policy says: “the housing requirement is to be delivered in line with the trajectory set out in Appendix 3”. However, for the policy to be effective and to aid the plan-user, the Annualised Housing Trajectory (which is illustrated within Appendix 3) should be included within the policy, or the very least within the supporting text and not relegated to an Appendix.		density across the city; the lowering of the AH threshold across most of the city; and for the housing mix to align with the HEDNA. The Council is proactively progressing an MoU with its neighbouring HMA/FEMA authorities regarding the employment shortfall.	

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						53. HBF welcome the commitment in criteria 3 to ensure that “housing land will be released in order to maintain a continuous 5 year supply of housing land in order to support a varied and flexible land supply to support housing delivery and sustainable development” but these need to be delivered through the other policies in the Plan. We also welcome the statement that “this will be monitored through the Council’s Annual Monitoring Report.” However, this further underlines the need for the housing requirement to be set out as both a total number and a dwelling per annum target. 54. In order to be effective and sound Appendix 8 of the Plan, the Monitoring Framework needs to be expanded. Monitoring is an important part of the plan. If monitoring shows the Council is not delivering the housing needed, then the Council should be required to take action to address this under supply. HBF would suggest explicit reference is made to the actions that the LPA can and would take in the case of under-delivery. Similarly, if the Council is looking to reply on development outside of its boundaries to meet it need, it clearly needs to monitor the development of both the policy and new housing to ensure this occurs. Without these			

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						elements being included within the Plan it would be unsound. 55. HBF is also concerned that the Plan clearly state that there is a need for 105 hectares of employment land only accommodate 60ha can be accommodated within the City's boundary. The Duty to Cooperate Statement is clear that there has been no agreement by any surrounding Authorities to meet this need, and as such this matter remains unresolved, this adds further weight to our concerns about the plan not being effective or positively prepared and the need for Green Belt review to address unmet housing and employment needs. As such, the Plan is currently unsound. ^[6] NPPF 2024 paragraph 234 ^[7] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/outcome/government-response-to-the-proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system-consultation#the-future-of-planning-policy-and-plan-making			

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Savills on behalf of Bellway Homes and Meriton College (ID52)	H1	N	Y	N	Y	Policy H1: Housing Land Requirements 4.30. Please refer to comments above under Policy DS1 with regards to overall housing numbers and the plan period.	Officer note: Please refer to representation under Policy DS1 from this representor as too long to replicate here	The plan period starting in 2021 is robust as it aligns to the evidence base (HEDNA and Census 2021). A retrospective start date is normal practice. The Council considers it will have 15 years looking forward from adoption in line with the NPPF and the LDS will be amended prior to submission to demonstrate this.	No change
Stantec on behalf of	H1	N		N	Y	5.2 Policy H1: Housing Land Requirements 5.2.1 The preamble to Policy H1: Housing Land Requirements describes how the HEDNA identifies a local housing need of 1,455	Required Changes 5.2.26 In order for Policy H1 to be	The evidence base regarding housing need and	Delivery on identified sites and in

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If Cates by Estates (ID56)						dwellings per annum, which equates to 29,100 dwellings over the Plan period 2021-2041. 5.2.2 It goes on to describe how, following an assessment of land options through the Call for Sites, the HELAA and a Density Study, a capacity of around 31,954 homes has been identified within the City, which is stated to provide <i>“a degree of flexibility above the local need figure of 29,100.”</i> 5.2.3 This capacity / supply is set out within Table 6.1 below within the Proposed Submission Local Plan² (reproduced below) – [officer note: please refer to full representation for this, appendices and further information]. 5.2.4 However, Policy H1 then reiterates that <i>“Provisions will be made for a minimum of 29,100 additional dwellings between 2021 and 2041.”</i> 5.2.5 There are a number of interwoven issues here as follows. Housing Need Versus Housing Requirement 5.2.6 As described previously within this Representation the Council appears to be conflating housing need and housing requirement.	considered sound, the Council needs to revisit its proposed housing requirement as described above. In addition, the Council must reevaluate its identified supply, including identifying additional sites for development in order to fully meet its housing requirement over the plan-period.	requirement is robust. There is no confusion between ‘need’ and ‘requirement’ – the Council can meet its identified need (as set out in the HEDNA) within its boundary and its requirement would be the same. The evidence base confirms the council’s approach to windfall is justified and sound. The leeway to allow for planning permissions that lapse before	the trajectory to be modified based on latest information acquired and from discussions with site promoters and developers.

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						The Council is presenting its housing need figure of 1,455 dpa (29,100 over the Plan period) as its requirement. 5.2.7 Table 6.1 presents a 'capacity' led figure of 31,493 dwellings, but this is not the figure that is enshrined within the Policy H1. Buffer or Allowance for Flexibility 5.2.8 The Housing Background Paper (November 2024) reiterates the Council's position that the housing need figure for Plan is 1,455 per annum or 29,100 over the plan period. 5.2.9 It goes on to state that this <i>"...has been assessed that this should be a minimum starting point and that this could be met with at least a 5% buffer"</i>. 5.2.10 The above strongly suggests that the 29,100 dwellings figure is exclusive of any buffer. 5.2.11 A 5% buffer to 29,100 dwellings would be 30,555 dwellings, yet the figure of 31,493 dwellings equates to a buffer of 8.22%. 5.2.12 If the Council intends to deliver its housing <u>need</u> with the addition of a buffer, then the figure inclusive of buffer should be		implementation or which are implemented but take longer than projected to construct, only refers to windfall developments and not for housing allocations; the committed supply; nor for identified consented sites. In terms of identifying / having consideration of the city's lapse rate, the housing supply figure applies a buffer and so is a robust position.	

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						that which is contained within Policy H1 as an overarching <u>requirement</u> figure. Committed Supply, Windfalls and Lapse Rates 5.2.13 It is not evident from the Council's evidence, including the HELAA (November 2024), whether a lapse rate has been applied to the dwellings included within the committed supply (13,975). 5.2.14 Regarding windfalls, the HELAA suggests that a windfall allowance of 2,800 dwellings is based on an anticipated supply of 200 dwellings per year (total 4,000 dwellings), with a deduction of 1,200 to avoid double counting of (a) the three monitoring years that have passed (2021/22 to 2023/24), and (b) the upcoming three monitoring years (2024/25 to 2026/27), which are considered to have already been accounted for by extant windfall planning permissions. 5.2.15 Although the Council's windfall allowance has been set at 200 dwellings per year, it suggests that the actual figure is much higher. Table 4 shows that, across 2021-2024, a total of 1,072 dwellings on windfall sites were consented, whilst 859 dwellings were completed; this equates to a lapse rate of 8% and includes both residential and purpose built student accommodation.		The sites that make up the trajectory in Appendix 3 and the 5YHLS have been prepared in full accordance with national policy and guidance and are constantly reviewed and an updated position will be offered at examination. 'Other identified sites' in Table 6.1 relate to HELAA sites that are not allocations, i.e. identified through 'call for sites'. They are not windfall	

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						5.2.16 The Council suggest this represents a “conservative approach to the windfall projection” which “provides significant leeway to allow for planning permissions that lapse before implementation or are implemented but take much longer than projected to construct”. 5.2.17 Whilst this may be the case as a far as windfall developments are concerned, but it is not apparent whether this is also true for housing allocations or the committed supply (which will include both windfall and allocated sites) or indeed whether the 8% lapse rate is considered to apply to both windfall and consented sites within the overall housing land supply composition. Remaining allocations (2017 Local Plan) 5.2.18 The Council is proposing to roll forward a number of previous allocations from the 2017 Local Plan, totalling 2,733 dwellings which do not benefit from planning permission. 5.2.19 Whilst the appendices to the HELAA include consideration of sites included within the Plan, the analysis of the appropriateness of the existing housing allocations is scant, with the allocations unanimously being carried forward purely based on the fact that they are allocated within the adopted Local Plan. There is no consideration of why these sites have not come forward in nearly		sites and the Council is confident it is not double counting.	

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						ten years or whether it remains appropriate for them to continue to be allocated in the future. Other Identified Sites (HELAA) 5.2.20 Housing Land Supply Components contained within Table 6.1 includes 816 dwellings which are identified as “Other identified sites (HELAA)”. 5.2.21 It is not clear how these sites have been derived (although presumably through the HELAA). 5.2.22 Nonetheless, it is not clear what status these sites have. They do not appear to be allocations, given they are listed separately. It may be concluded then that they are windfalls, except a separate windfall allowance has also been included in the identified supply. 5.2.23 Catesby Estates is therefore concerned that there appears to be no evidence of the deliverability of these sites. For example, despite 816 being a very specific number, a schedule of these sites has not been provided in any of the evidence base documents. Furthermore, given they are not allocations, it appears as though the Council is attempting to accommodate two separate windfall sources in its overall supply.			

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Respon dent / orga nisat ion / agen t	S ec ti o n	Com plies with Duty to Coop erate Y/N	Leg ally Com p lian t? Y/ N	Sou nd Y/ N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						5.2.24 Until further evidence and justification is provided for the inclusion of these sites within the identified supply, it is considered that they should be excluded, resulting in the removing of 816 dwellings from the identified supply. Soundness 5.2.25 Policy H1 is unsound for the same reasons DS1 is unsound as described previously. In addition, it is also not: - Effective – a number of elements of the Council’s identified housing supply are not deliverable over the plan-period. ² Table 6.1 itself appears to be based upon Table 5 within the HELAA, which breaks down the committed supply into a number of component parts including; Sites under construction, Sites with Detailed Planning Permission (not commenced), Sites with Outline Planning Permission and Permitted Development.			

H2 - Housing Allocations

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Define Planning & Design Ltd on behalf of William Davis Homes(ID14)	H2	N	Y	N	Y	Ensuring the delivery of housing “<i>where it is needed</i>” is a central tenet of sustainable development in the NPPF (paragraph 60) and will also be critical in realising the Councils own sustainability objectives by reducing the need of residents to travel between new housing and surrounding services, facilities and employment opportunities. NPPF paragraph 16 states that plans should be prepared positively, in a way that is aspirational but deliverable. NPPF paragraph 69 states that “planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”. The Regulation 19 Plan fails to comply with this and is therefore inconsistent with national policy as further discussed below. Sufficient Supply and Mix A review of the allocation sites raises several concerns regarding the lack of delivery of sites allocated as long ago as 2017; and because of the size and nature of those	Further sites should be allocated for residential development, including a review of Green Belt sites, to ensure a sufficient range of homes can be provided (NPPF paragraph 8b) and housing needs met.	All identified sites and their capacity figures were assessed by officers. Discussions have been ongoing with site promoters and developers and an updated trajectory position will be provided for the examination. The Council considers the findings of the Green Belt Technical Update Study, which demonstrates the Green Belt areas in the city continue to serve Green Belt purposes very well, is robust and no further Green Belt needs to be	Delivery on identified sites to be modified based on latest information acquired and from discussions with site promoters and developers.

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						sites and the proposed new allocations with significant viability issues and the limited quality and mix of accommodation that would be provided. The Council should provide a detailed account of the planning position and history of the sites proposed for allocation to evidence the allocations are actually deliverable, achievable and available. The available evidence work fails to do this, particularly in relation to allocations carried forward and therefore there can be no confidence that the housing allocations will be delivered within the plan period. Concerns regarding three key sites are highlighted below. However, all sites should be appropriately assessed and the information published to support the allocations. • H2:38 - Friargate (1,350 dwellings on previously developed land) – This allocation is noted in the Viability Study as being the only strategic site in the Plan. Under viability testing, the site is unviable under either scenario used and only becomes marginally viability with a 25% decrease in build costs, or a 30-40% increase in market values, at 0% affordable housing. Not only are build costs or market values unlikely to change this significantly, the		released. In addition, the plan shows the city can accommodate its housing supply within its boundary on brownfield land.	

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						provision of 0% affordable housing in a city centre location on a strategic site would not address the acute needs identified in the City. Further, insufficient evidence has been provided to demonstrate grant funding is available or has been secured to deliver the site. Given the unviable nature of the site, additional sites should be allocated and safeguarded to ensure housing needs are met should the site stall. • H2:3 – Walsgrave Hill Farm (carried forward allocation for 900 dwellings on greenfield land) – a longstanding Local Plan allocation that appears to have had no relevant planning history since a screening request in 2012. Clearly this suggests the site is not deliverable, and inadequate information to support its continued allocation has been provided. Allocations proposed to be carried over should be appropriately assessed to ensure the Plan is robust and delivers the housing needed for the area. • H2:26 - Coventry Central Policy Station (600 dwellings on previously developed land) – the site in existing use as a police station. The HELAA does not provide any information to support the site being available. Further, no justification is given for a significant increase of density above that assessed against the minimum density			

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						standards (capacity of 300 dwellings), particularly given the site's location within an area where scale and massing are controlled by important views to the cities three spires. In addition to the above, it is understood that 12 of the existing allocated sites have capacity remaining without consent, 9 of which have not delivered any of the residential accommodation allocated (according to Table 13 of the HELA November 2024). Just these 9 sites total 2,085 dwellings not yet commenced or consented. Neither the HELAA nor any other evidence document published has appropriately reviewed or assessed the existing allocations to inform the review and ensure a deliverable housing land supply. Trajectory As highlighted above, it is clear that there are significant issues to the delivery of the proposed and carried over allocations, including on the grounds of viability. The Housing Trajectory provided at Appendix 3 suggests neither the existing or proposed allocations without permission will start being delivered until 2029/30. It also			

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						includes delivery from sites with outline consent. Until these have detailed consent or are under construction their early delivery should not be assumed. A windfall allowance of 200 dpa is also applied to the latter two years of the first five years of the Plan. When looking at the projected completions the annual figures are subject to substantial fluctuation, including some years being under or very close to the housing requirement proposed by the Council (which, as set out in representations to Policies H1 and DS1 is not in conformity with national policy and requirements). This occurs as early as 2029/30 and 2030/31. This clearly indicates the difficult nature of delivering a significant amount of much needed new housing (including all the new proposed allocations) on brownfield land where there are viability issues and likely technical constraints. Were the housing requirement to be increased to 1,964 (the HEDNA figure + uplift), the current trajectory would only see the housing requirement being met once between 2024 to 2041. Were the standard method used (3,188), the housing requirement would only be met once in the 20 year plan period (being in 2021/22). The housing requirement must be increased to comply with national			

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						policy and as a result further allocations will be needed. In this case, exceptional circumstances for the release of sites from the Green Belt clearly exist due to the lack of available, achievable and deliverable brownfield land. Viability The Viability Assessment clearly demonstrates that the majority of the new housing allocations will not be viable without the procurement of grant funding (for which there does not appear to be evidence of). The Viability Test reviews tests schemes across two scenarios (full 'net zero' policy and 'fabric only' policy). In both scenarios, there are significant viability concerns, especially for the brownfield sites which the Council heavily rely on in the site allocations. Significantly, a site allocated to deliver 1,350 (Friargate) is identified as being unviable, and only deliverable with significant public sector funding. As discussed above, this has not been appropriately addressed and it is unclear whether this site is deliverable. Additionally, the Viability Study is clear that a significant number of the proposed allocations would only be deliverable with minimum infrastructure contributions. This highlights the need for new greenfield sites to be allocated, which are concluded to be viable			

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						under either option to enable the delivery of a range of housing including for recent graduates and small families as well as delivering affordable housing. These sites can also generally accommodate green infrastructure provision as well as make financial contributions to wider infrastructure requirements. To identify sufficient land, the Green Belt must be reviewed to identify the most suitable sites which would help the Council deliver a sufficient supply and mix of housing as required by national policy. As part of this review, William Davis Homes' site at Duggins Lane must be considered for allocation. Significantly, the viability evidence is predicated on build costs not increasing significantly and assumes that residual values and costs remain constants (paragraph ES 25). However, the BCIS construction industry forecast for quarter 4 of 2024 to quarter 4 of 2029 suggests that building costs will increase by 17% and tender prices will rise by 19% over the same period. This outstrips sales estimates for the same period. As such, the viability of the Plan is likely to worsen and fundamentally the Plan will fail to deliver the required infrastructure, including housing.			

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						Land at Duggins Lane, Coventry William Davis Homes (WDH) has been promoting land at Duggins Lane (the site) for allocation in the Local Plan Review. The site is 3.2ha in size and is located to the west of the Tile Hill area of the city. It forms part of a wider designated Green Belt that tightly wraps the existing urban area and extends into Solihull Metropolitan District to the west. The site Masterplan is attached to these representations and demonstrates the sites suitability, deliverability and capacity for a residential development of around 55 dwellings. A Sustainable Location The site represents an excellent opportunity for sustainable residential development and is extremely well positioned in terms of access by active travel and public transport to the schools and other services and facilities within Tile Hill and to the City Centre and beyond for higher order services and employment opportunities. The nearest primary school to the site is Leigh Church of England Primary School (circa 0.6m to the east) and the nearest secondary school is West Coventry Academy (around 0.9miles away).			

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						The nearest shops are located within a small local centre on Station Avenue to the north east of the site (around 0.3 miles away). This includes a convenience store and a pharmacy. Further north on Station Avenue are further convenience stores, food and drink outlets and a post office. Employment opportunities are provided locally at the nearby University of Warwick, the Charter Avenue Industrial Estate and Westwood Business Park, and are also available in the City Centre and wider urban area. The nearest bus stop is approximately 200m to the east of the site on Duggins Lane, while more frequent services (2 per hour) can be accessed at a 'terminus' on the junction of Station Avenue and Torrington Avenue, 400m to the east. The site is also only 0.4 miles from Tile Hill railway station, located to the south east. This includes a service to Birmingham every 30 minutes, and an hourly service to London Euston via Northampton. These routes include stops at Coventry City, Rugby and Milton Keynes amongst others. A Transport Appraisal was submitted with the call for site submission for the site (and provided with these representations). It concludes that the sites location			

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						would encourage active travel by residents and consequently the development would promote a sustainable community, in accordance with the extant Local Plan and national policy. Green Belt The site is closely and well connected to an existing residential area to the east and peri-urban recreational uses to the north. It is well confined by Duggins Lane to the south and a strong landscaped boundary to the west. As such, it does not a particularly sensitive part of the Green Belt, which in the wider area is generally more open, rural land. Its development would also address some of the stated objectives by, for example, linking to the wider public right of way network and facilitating access to the wider Green Belt for recreational purposes. Significantly, the removal of the site from the Green Belt would not undermine the purposes of the wider Green Belt as set out in the NPPF and briefly addressed below. Purpose a – The development of the site would form part of a logical and consistent settlement edge, particularly when considered in the round with allocated housing development to the south at Cromwell Lane. It would not result in an unnatural or sprawling urban form.			

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						Purpose b – There is no risk of physical coalescence with other settlements and in visual terms, the site is extremely well contained by a combination of the urban form, topography and existing vegetation, so the perception of encroachment or coalescence would be very limited. Purpose c – The Authority area boundary, and the sites mature and robust landscape structure, will provide a clear and defensible long term Green Belt boundary limiting encroachment on the countryside. Purpose d – There are no features of historic interest in the site or its surrounds. Purpose e – The capacity of brownfield sites is insufficient to meet the identified housing needs in the City, including the range and type of housing needed. As such, it is appropriate to undertake a Green Belt Review and remove the site at Duggins Lane from the Green Belt and allocate it for residential development in the Coventry Local Plan Review. Additionally, recent updates to National policy has introduced “grey belt” when considering whether a development would be inappropriate development in the Green Belt. This consideration for decision making has no			

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						transitional arrangements and is effective from its introduction in December 2024. As set out above, the site does not strongly contribute to purposes a, b or d and as demonstrated below there are no strong reasons for refusal or for Footnote 7 (NPPF 2024) to be engaged. As such, the site should be considered to meet the definition of grey belt as set out in the NPPF glossary. Whilst the Local Plan is being reviewed under the previous NPPF, the Council should consider the impact of the introduction of grey belt, and indeed should use this to inform its approach to releasing sites from the Green Belt to contribute towards meeting housing needs (NPPF December 2024, paragraph 148). Technical Matters <i>Access A Transport Appraisal has been produced for the site and highlights that the proposed access arrangements, shown on the Masterplan, satisfy local and national requirements including with regards to visibility.</i> <i>There are no identified highways or transportation reasons which would preclude the residential development of the site. The Masterplan also highlights</i>			

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						<i>the potential to link new footpaths to existing rights of way to improve access into the surrounding countryside.</i> <i>Ecology</i> <i>The site is not subject to any statutory nature conservation designations and consists of a single semi-improved neutral grassland field, bounded by species-poor intact hedgerow with trees, plantation broadleaved woodland and broadleaved woodland.</i> <i>A pond is situated within broadleaved woodland to the south of the site. The ecological value of the site is considered to be at site level only and is not significant in the wider context. A Preliminary Ecology Appraisal was undertaken to support the site submission (and is provided with these representations) and concludes that there are no overriding constraints to the site's development subject to the implementation of appropriate mitigation measures.</i> <i>Landscape</i> <i>The mature landscape framework of the site and wider area provides a great deal of visual containment and would provide a defensible new boundary to the Green Belt.</i>			

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						<i>The arboricultural survey for the site highlights that there is no ancient woodland or tree preservation orders covering any part of the site or immediately adjacent land. Furthermore, the mature broadleaved woodland and boundary trees/hedgerows can be largely retained in the development and there will be minimal adverse arboricultural impacts as a result of the site's development.</i> <i>Heritage</i> <i>The site does not contain, nor does it lie adjacent to any heritage assets. It is not affected by any heritage constraints.</i> <i>Flood Risk and Drainage</i> <i>The site is entirely within Flood Zone 1 and therefore at low risk of fluvial flooding. The site does contain areas of surface water flood risk, these being largely limited to low risk, except high risk along Duggins Lane and the sites western boundary. A Flood Risk Assessment was included within the call for sites submission and demonstrates that the sites development would be acceptable and sequentially preferable in line with national policy and guidance.</i>			

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						<i>The site would include sustainable drainage systems, which has been incorporated into the Masterplan (submitted with these representations) and will ensure that the development of the site does not increase flood risk elsewhere.</i> <i>Ground Conditions</i> <i>A Phase 1 Desk Study Report has been produced for the site and does not identify any significant constraints. It concludes that the site is suitable for residential development.</i> <i>Utilities</i> <i>The Utilities Assessment undertaken for the site does not highlight any significant issues that would limit the site's residential development. No existing services cross the site and there are connections available within the surrounding area to meet future needs.</i> Conclusion <i>WDH's site at Duggins Lane is a well-connected, sustainable site with the potential to deliver around 55 dwellings, including affordable housing provision, open space, landscape and sustainable drainage. The site is owned by WDH, an established and well regarded house</i>			

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						<i>builder, and therefore could be delivered early in the plan period to meet housing needs in the city.</i> <i>The site itself is not particularly constrained, is visually well contained and its location and aspect, combined with the existing urban and landscape structure mean that it does not form a particularly sensitive part of the Green Belt. It is entirely suitable for a sustainable residential development, and is immediately deliverable.</i> <i>As highlighted in these representations, the Councils approach to housing allocations could mean a number of sites are undeliverable, may not deliver the amount of housing allocated for and/or will not deliver wider benefits in relation to infrastructure provision and a range and mix of housing. Therefore, the housing allocations process must be re-visited including release of appropriate Green Belt sites including land at Duggins Lane.</i>			
Marro ns on behalf of Richbo rough	H2	No response	No response	N	Y	Policy H2: Housing Allocations <u>Not sound</u> 98. Policy H2 1. and Table 6.2 identifies the sites to be allocated for housing development. Sites H2:31 and	Table 6.2 should be amended to remove H2:31 and amend the total dwelling column for H2:36 to 300 dwellings.	The NHS has clarified in their reps their position on the Paybody Building site and a modification to remove this site from the	Withdraw Paybody proposed allocation and exclude it

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
(ID31)						H2:36 do not meet the definition of Developable as set out in the NPPF Glossary and should be removed. 99. H2:31 Paybody Building, Stoney Stanton Road is proposed for allocation for 280 dwellings. However, the Council's own HELAA assessment identifies that the site is a current NHS facility which is <u>likely</u> to become available for redevelopment for residential based use <u>or</u> healthcare based use. The narrative concludes that <u>should</u> the site become available, it is a suitable site for allocation. Given this uncertainty, there is not a reasonable prospect that the site will come forward for housing in the CLPR Plan Period, if at all. 100. H2:36 Land at Spon End is proposed for allocation for 750 dwellings. However, it is noted that this would be facilitated by the demolition of 450 existing dwellings. Thus, the net increase of 300 dwellings should be accounted for, not the entire 750 dwellings as set out.	Policy H2:1 and Table 6.2 should be amended to increase the allocated capacity of the Keresley SUE (H2:1) to reflect the availability and suitability of land off Fivefield Road (HELAA Ref: BAB-012-24). The Council will also need to consider updating its Urban Extension Design Guide SPD.	housing figures will be forthcoming. The Council accepts that it should be a net dwelling figure for Spon End and a modification to the policy will be forthcoming. The site allocation is sound in principle. The assessment of deliverability for Keresley SUE is robust. The allocation figure has not been changed as the figure is not set as a maximum and any additional sites that come forward will be delivered through the DM process.	from supply calculations and update the IDP. Update Spon End delivery figure to net dwellings figure.

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						101. Table 6.2 should be amended to remove H2:31 and amend the total dwelling column for H2:36 to 300 dwellings. 102. Policy H2: Housing Allocations – H2:1 Keresley SUE <u>Not sound</u> 103. Policy H2:1 and Table 6.2 re-allocates the Keresley SUE for 3,100 dwellings to be completed within the Plan period. The policy is however not justified as there is more capacity within the allocation than 3,100 dwellings. 104. The Housing and Economic Land Availability Assessment (HELAA) (November 2024) confirms that as of 30th September 2024, circa 2,500 dwellings have been granted planning permission, with circa 600 dwellings remaining to come forward. As at February 2025, the approval of schemes FUL/2020/0748 (for 388 dwellings) and PL/2023/0001155/OUTM (for up to 40 dwellings)			

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						has meant that now circa 2,920 dwellings have planning permission with circa 180 dwellings remaining to come forward. 105. The total dwelling capacity has been informed by the Urban Extension Design Guide SPD (2019), which includes an indicative masterplan of the SUE which identifies development boundaries. The remaining land within these development boundaries that does not already have planning permission includes land currently used for sports pitches (Coventry Colliery and Keresley Sports and Social Club), and a golf driving range (John Reay Golf Centre). There is no evidence to that these sites have been put forward through the call for sites, or that they are likely to become available during the Plan period. It is unclear therefore whether the 3,100 dwellings can be met based on the indicative masterplan within the SPD. 106. However, Richborough are promoting land off Fivefield Road (HELAA Ref: BAB-012-24) which is located within the Keresley SUE for circa 350			

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						dwellings. The land is identified as Openspace/Visual Amenity Space on the indicative masterplan within the SPD and therefore has not contributed towards delivering the 3,100 dwellings or higher figure that now is required to address shortfalls in supply to meet the requirement. 107. The land is not publicly accessible, save for one footpath around the edge of the site. The land also falls adjacent to residential development under construction to the south and has limited visual amenity. There are no opportunities for sport or recreation as the land is in active agricultural use, and there are no proposals as part of the development of the allocation for the land to be brought into use as openspace. Its public value is therefore limited to certain parts of the site around the edge and these areas of value can be maintained and enhanced through careful masterplanning at the application stage. 108. There is no policy basis for the land to be open space. Applying the Council's Open Space SPD, the			

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						permitted 2,927 dwellings will produce 7,025 people (2.4 per dwelling) indicating a minimum Green Space requirement of 23.39 ha. However, the approved developments will provide 41.94 ha of Green Space as illustrated in the table below. Furthermore, the sites key open space assets, including Hounds Hill and the ponds across the site, will be maintained and enhanced to provide high quality, accessible green space thus further enhancing provision. [Officer comment: Please refer to table in their formal response form as too much detail to include here]. 109. The land is free from environmental constraints that would prevent its residential development. NPPF Chapter 11 promotes the effective use of land in meeting the need for homes and encourages optimising densities in sustainable locations. It is appropriate therefore for the capacity of the			

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						Keresley SUE in Table 6.2 to be increased to reflect the land available off Fivefield Road. 110. Appendix 1 of the SPD states “as the SUE evolves through the planning process and development stages, this Indicative Masterplan will be updated to reflect approvals and delivery.” The indicative masterplan should therefore be updated to reflect the need for additional housing, and the availability of the land for development. 111. Along with being a suitable site, the Land off Fivefield Road is both achievable and deliverable. Richborough has a proven track record of successful delivery within the Keresley SUE, evidenced through the OUT/2022/0713 and OUT/2022/0712 sites contributing 550 dwellings towards Coventry’s housing supply, reinforcing the achievability of the Fivefield Road site. Works have already begun on preparing a planning application, demonstrating clear intent for delivery.			

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						112. Policy H2:1 and Table 6.2 should be amended to increase the allocated capacity of the Keresley SUE (H2:1) to reflect the availability and suitability of land off Fivefield Road (HELAA Ref: BAB-012-24). The Council will also need to consider updating its Urban Extension Design Guide SPD.			
Marro ns on behalf of Catesb y Estate s(ID27)	H2	Y	Y	N	Y	Catesby Estates has an overall concern with the focus of new housing allocations in particular on brownfield sites. Whilst making best use of brownfield land is supported by the NPPF (including Paragraph 123), brownfield development is generally more challenging in terms of deliverability and viability. Thus, the focus of new allocations on brownfield sites likely means less overall affordable housing delivery, for which there is a significant need in the City of some 2,035 dwellings per annum according to the HEDNA. Furthermore, development will be less able to provide necessary infrastructure delivery, to the disbenefit of new and existing residents of the City. • Catesby Estates considers sites H2:31 and H2:36 do not meet the definition of Developable as set out in the NPPF Glossary, and should therefore be removed from Table 6.2. • Catesby Estates also objects to the omission of Land at Birmingham	Removal of sites H2:31 and H2:36 from Table 6.2. Including Land at Birmingham Road, Allesley as an allocation in Table 6.2.	The NHS has clarified in their reps their position on the Paybody Building site and a modification to remove this site from the housing figures will be forthcoming. The Council accepts that it should be a net dwelling figure for Spon End and a modification to the policy will be forthcoming. The site allocation is sound in principle.	Withdraw Paybody proposed allocation and exclude it from supply calculations and update the IDP. Spon End delivery figure changed to net

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						Road, Allesley as an allocation in Draft Policy H2. Development can be focused to the south and east of the Site with a newly established landscape buffer to the north and west which would form an appropriate new Green Belt boundary by effectively rounding off this western part of Coventry.		The deliverability assessment of identified and allocated sites is sound. Individual sites that come forward, including those that have been discounted through the Local Plan and HELAA process will be assessed through the DM process.	dwelling figure.
Historic England (ID19)	H2:30	No response	No response	N	N	Policy H2: Housing Allocations Site H2:30 Whitefriars Street Car Park Historic England (HE) has previously advised, in our response to the Coventry Local Plan Review Regulation 18 consultation, that the Plan should be accompanied by heritage assessments for the proposed site allocations to assess the impact of development on the significance of designated and non-designated heritage assets and their settings. To ensure that plans are positively prepared Historic England advises undertaking the process of the 'Site Selection Methodology' as set out in Historic England's Advice Note 3 The Historic Environment and Site Allocations in Local Plans, 2015	In order to make the Coventry City Council Publication Consultation (Regulation 19) Plan sound, HE considers that the following is required: Further assessment work should be undertaken to -- Identify all of the heritage assets affected by the potential site allocation;- Understand what	Further discussions are underway with Historic England and a SoCG is to be agreed.	No change

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						(HEAN3):https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/At the Regulation 18 consultation stage we also recommended that detailed Heritage Impact Assessments (HIAs) are prepared, either by, or on behalf of, the Local Authority, with reference to Historic England's Advice Note 3 The Historic Environment & Site Allocations in Local Plans, 2015 (HEAN3) and Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3):https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritageassets/In terms of the evidence accompanying the Regulation19 Proposed Submission Plan, the November 2024 'Design and Heritage Background Paper' is welcomed. HE notes that this sets out the rationale behind the Plan's policies on design and heritage but does not specifically address any assessments in relation to the historic environment for the proposed site allocations. HE notes that the 'Housing and Employment Land Availability Assessment' (HELAA), November 2024, includes individual site assessments, which take into account the 'Major	contribution the site makes to the significance of the heritage assets;- Identify what impact the allocation may have on that significance; and,- Consider maximising enhancements and avoiding harm. If this work has already been undertaken it has not been possible to identify it within the consultation material. We would be pleased to discuss this with you further ahead of the Examination in Public hearings for the Plan, with a view to preparing a Statement of Common Ground.		

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						<i>Planning Considerations'</i> of Conservation Areas and 'identified' heritage assets and also 'Other planning considerations' including 'Built Environment and Heritage'. We particularly note that the methodology for the assessments encompass under 'Heritage Assets', that: 'Sites likely to affect an identified heritage asset are normally deemed unsuitable due to the unknown impact of the development. The presence of a heritage asset does not always prevent development, but the type and nature of the constraint would need to be addressed and mitigated before the site could be deemed suitable for development' & that the 'Solution' given is that 'A Heritage Impact Assessment would be required, prepared in consultation with relevant agencies, to assess the potential impact of any future development'. In relation to the proposed site allocation H2:30 Whitefriars Street Car Park, Coventry, HE considers that residential development has the potential to cause harm to important archaeological remains that contribute to the significance of the designated heritage assets of the Carmelite Friary (Whitefriars). We strongly suggest that further work be undertaken in respect of the historic environment to assess whether the level of			

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						development sought at the site could be achieved whilst minimising harm to the historic environment. HE notes that in the HELAA assessment of proposed site allocation H2:30 (Site Ref: STM-012-24, HELAA p.89) the 'constraints' of the site are identified as being situated within the Archaeological Constraint Area and that the site sits within the View Cone 7: Parkside, as defined in the 'Tall Buildings Design Guide and Three Spires View Management Framework SPD', with the 'Narrative' of the HELAA stipulating that 'any proposal should consider the above when assessing scale and massing'. However, HE notes that the Plan gives an estimated capacity for the site of 185 units, with the HELAA advising that the 'site is likely to lend itself to high rise development which may achieve more than the policy minimum (150), subject to the necessary planning requirements such as amenity space and access', with the 'assessed capacity based on similar developments within the City Centre area'. Despite the assessment in the HELAA, HE considers that there is no meaningful assessment in relation to the significance of, and likely impact of the development on the significance of, the setting of designated and non-designated heritage assets and it			

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						has not been possible to locate any other evaluation of impact within the consultation information. The proposed allocation lies between the Grade II* listed Whitefriars Gate and the main core of monastic buildings around the Grade I listed Whitefriars Museum. Whitefriars Gate formed the western edge of the outer precinct of the priory. The north edge, picked up in excavations in 2013, was on the north side of Whitefriars Lane (https://ulasnews.com/2014/12/08/medieval-coventry-revealed-incitys-heatmap-project/) and the precinct would have extended down to the historical route of London Road (now under the flyover). The area comprised housing with gardens and backcourts prior to and after WWII and then looks to have been successively cleared to form the current car park and park; therefore, preservation of archaeological remains should be reasonable. It is likely that the proposed allocation is in the outer court of the Priory and there is strong potential for the continuation of survival of archaeological remains associated with, and enhancing our understanding of, the 14th century Carmelite Priory. HE therefore considers that a heritage assessment is			

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						required, to inform the deliverability <i>prior to allocation</i> and that this should consider the potential for on-site archaeology associated with the Priory; with potential archaeological evaluation through geophysical survey and excavation to follow on before allocation. We note that although the HELAA identifies the site as being situated within the Archaeological Constraint Area, the Plan itself does not allude to this within the '<i>Essential Site Specific Requirements and Other Uses</i>' of Policy H2. In terms of tall buildings, Coventry City's skyline includes the Spires of St. Michael, Holy Trinity & Christchurch. The Council's '<i>Tall Buildings Design Guide and Three Spires View Management Framework SPD</i>' notes that these spires '<i>have become synonymous with the image of the city, forming the iconic Three Spires Skyline. They are a majestic site on the skyline of the city and form an important link to the City's mediaeval past</i>'. The SPD highlights that for View cone 7: Parkside, within which proposed site allocation H2:30 is situated: '<i>Whilst this view is not a major route into the city centre, it is one of the main entrance points into the technology park and it offers a unique view of St. Michaels, Holy Trinity and the Council House clock tower. It also provides a</i>			

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						<i>strong visual link between the modern technology park and the historic city</i>’. The SPD goes on to advise that ‘Any development, adjacent to Whitefriars Gate could comfortably accommodate in the region of two/three storeys’. Although the SPD seeks to restrict building heights in this location, there is no information available as part of the consultation to demonstrate that any views analysis has been undertaken as part of the Plan process to suggest that residential development could come forward at the quantum sought, taking into account historic environment considerations. For example, would restricted building heights result in blocks which, by virtue of their height, scale and massing, be harmful to the historic environment? Would the quantum of development anticipated at the site result in an overbearing height, scale and mass to the city, resulting in harm to heritage assets? Is the quantum of development achievable at the site taking into account historic environment considerations? As such, there remains a lack of meaningful evaluation within the evidence base of the Regulation 19 Plan of what the impact that the development of the site might have on designated and non-designated heritage assets			

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						and their setting. HE is extremely concerned that there is no assessment of the potential issues relating to the historic environment, including the potential impact on archaeological remains or on the sky line of the city of Coventry. As such, we <i>object</i> to the allocation in respect of the quantum of development sought. In the absence of any assessment of the degree of harm which the preferred site allocation might cause to the historic environment, at present the Plan cannot demonstrate that the site it is putting forward for development is compatible with the Council's own extant, and proposed, policies for the protection of the historic environment. Moreover, in terms of national requirements, the Plan also fails to demonstrate that:- The proposed site for allocation would be likely to <i>"conserve heritage assets in a manner appropriate to their significance"</i> as required by NPPF December 2023 Paragraph 195.- The site that it is putting forward for development will deliver a <i>"positive strategy for the conservation and enjoyment of the historic environment"</i> as is required by NPPF December 2023 Paragraph 196.- The site to be allocated would contribute to protecting or enhancing the historic			

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						environment. Therefore, it has not shown that it is likely to deliver sustainable development in terms of the historic environment (NPPF December 2023 Paragraph 7).Therefore, the draft Plan has not shown that it would be likely to deliver the Government's objectives for the historic environment.			
Histori c Englan d (ID19)	H2: 32	No resp onse	No res pon se	N	N	Policy H2 – Site Allocation H2:32 Dale Buildings, Tower Street, Coventry <i>Historic England (HE) has previously advised, in our response to the Coventry Local Plan Review Regulation 18 consultation, that the Plan should be accompanied by heritage assessments for the proposed site allocations to assess the impact of development on the significance of designated and non-designated heritage assets and their settings. To ensure that plans are positively prepared Historic England advises undertaking the process of the 'Site Selection Methodology' as set out in Historic England's Advice Note 3 The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3):https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/At the Regulation 18 consultation</i>	In order to make the Coventry City Council Publication Consultation (Regulation 19) Plan sound, HE considers that the following is required: Further assessment work should be undertaken to -- Identify all of the heritage assets affected by the potential site allocation;- Understand what contribution the site makes to the significance of the heritage assets;- Identify what impact the allocation may have on that	Further discussions are underway with Historic England and a SoCG is to be agreed.	No change

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						<i>stage we also recommended that detailed Heritage Impact Assessments (HIAs) are prepared, either by, or on behalf of, the Local Authority, with reference to Historic England's Advice Note 3 The Historic Environment & Site Allocations in Local Plans, 2015 (HEAN3) and Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3):</i> https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritageassets/In terms of the evidence accompanying the Regulation19 Proposed Submission Plan, the November 2024 'Design and Heritage Background Paper' is welcomed. HE notes that this sets out the rationale behind the Plan's policies on design and heritage but does not specifically address any assessments in relation to the historic environment for the proposed site allocations.HE notes that the 'Housing and Employment Land Availability Assessment' (HELAA), November 2024, includes individual site assessments, which take into account the 'Major Planning Considerations' of Conservation Areas and 'identified' heritage assets and also 'Other planning considerations' including 'Built Environment and Heritage'. We particularly note that the methodology	significance; and,- Consider maximising enhancements and avoiding harm. If this work has already been undertaken it has not been possible to identify it within the consultation material. We would be pleased to discuss this site with you further ahead of the Examination in Public hearings for the Plan, with a view to preparing a Statement of Common Ground.		

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						for the assessments encompass under 'Heritage Assets', that: <i>'Sites likely to affect an identified heritage asset are normally deemed unsuitable due to the unknown impact of the development. The presence of a heritage asset does not always prevent development, but the type and nature of the constraint would need to be addressed and mitigated before the site could be deemed suitable for development'</i> & that the 'Solution' given is that 'A Heritage Impact Assessment would be required, prepared in consultation with relevant agencies, to assess the potential impact of any future development'. In relation to the proposed site allocation H2:32 Dale Buildings, Tower Street, Coventry, HE considers that residential development at the site could, in principle, be acceptable but we strongly suggest that further work be undertaken in respect of the historic environment <i>prior to allocation</i> to ensure that the level of development sought at the site could be achieved whilst minimising harm to the historic environment. HE notes that in the HELAA assessment of proposed site allocation H2:32 (Site Ref: STM-013-24, HELAA p.91) the 'constraints' of the adjacent Lady Herbert's Garden and the Burges Conservation Area are identified, along with			

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						the site being identified as being situated within the Archaeological Constraint Area. The site is also identified as being situated within the View Cone 1: Foleshill Rd, as defined in the <i>'Tall Buildings Design Guide and Three Spires View Management Framework SPD'</i> and we note that the <i>'Narrative'</i> stipulates that <i>'due consideration and mitigation should be given to the neighbouring heritage asset and view cone'</i>. Firstly, HE would wish to point out that the site is near to a number of heritage assets. As well as Lady Herbert's Garden and the Burges Conservation Areas, the following heritage assets should be considered in any assessment: Lady Herbert's Garden (GII Registered Park and Garden); Cook Street Gate and Coventry city walls (Scheduled Monuments); the Grade I Listed Buildings of The Old Grammar School and City Gate and the Grade II Listed Buildings of : Gateway and Boundary Wall at Cook Street Entrance to Lady Herbert's Garden; Garden Shelter and Platform 50m North-East of Lady Herbert's Homes; Northern Block at Lady Herbert's Homes; Southern Block at Lady Herbert's Homes and the Boundary Wall and Gates on West Side of Lady Herbert's Garden.			

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						Despite the HELAA assessment of the site, in relation to the above-listed heritage assets, HE considers that there is no meaningful assessment in relation to the significance of, and impact on the significance of, and the setting of designated heritage assets and it has not been possible to locate any other evaluation of impact within the consultation information. In recommending the site to be shortlisted for residential development with an assessed capacity of 200 units HE notes that the HELAA assessment concludes that: <i>'Given the urban nature of the site, in the city centre and close to sites of a similar nature which have delivered several hundred units in high rise format, it is considered reasonable to expect this site to deliver a similar scheme. However, due consideration and mitigation should be given to the neighbouring heritage asset and view cone. Site should be considered for Local Plan allocation, as it is a strategic site in a city centre gateway location'</i>. Coventry City's skyline includes the Spires of St. Michael, Holy Trinity & Christchurch. The Council's <i>'Tall Buildings Design Guide and Three Spires View Management Framework SPD'</i> notes that these spires <i>'have become synonymous with the image of the city, forming the iconic Three Spires</i>			

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						<i>Skyline. They are a majestic site on the skyline of the city and form an important link to the City's mediaeval past'. The SPD highlights that View cone 1: Foleshill Road, within which proposed site allocation H2:32 is situated, 'offers a strong and evolving view of St. Michael and Holy Trinity, whilst Christchurch also becomes visible beyond'. Although the SPD seeks to restrict building heights in this location, there is no information available as part of the Local Plan consultation to demonstrate that any views analysis has been undertaken as part of the Plan process to suggest that residential development could come forward at the quantum sought, taking into account historic environment considerations. For example, would restricted building heights result in blocks which, by virtue of their height, scale and massing, be harmful to the historic environment? Would a scheme be able to preserve, enhance and better reveal the character and appearance of Lady Herbert's Garden Conservation Area? Would the quantum of development anticipated at the site result in an overbearing height, scale and mass not only to the Conservation Areas but to the area/city more widely resulting in harm to a great</i>			

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						number of heritage assets as a result, given the number in close proximity. Furthermore, as the site is adjacent to the Cook Street Gate and Coventry City Wall Scheduled Monuments any heritage assessment should consider the potential impact of development on the setting of these heritage assets, as well as that of the Grade I listed City Gate and also the potential for on-site archaeology associated with the City Wall that may be present in the east of the site. Whilst we welcome that the 'Essential Site Specific Requirements and Other Uses' in Table 6.2 – 'Site Allocations for Housing' include for this site: 'Enhancement of listed medieval wall and Cook Street gate scheduled monuments and adjacent conservation area and Registered Park and Garden. Development needs to be sensitive to Archaeological Constraint Area and View Cone 1: Foleshill Rd, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD', this does not negate the need for a heritage impact assessment to inform the allocation. As such, there remains a lack of meaningful evaluation within the evidence base of the Regulation 19 Plan of what the impact that the development of the site might have on			

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Respo ndent / organi sation / agent	Sec tio n	Com plies with Duty to Coop erate Y/N	Leg ally Co mpl iant Y/N	Soun d Y/N	Does respo ndent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						<i>designated heritage assets and their setting. HE is extremely concerned that there is no assessment of the potential issues relating to the historic environment including the potential impact on the character and appearance of Lady Herbert's Garden and the Burges Conservation Areas, the setting of nearby Listed Buildings and Scheduled Monuments, potential archaeology or the sky line of the city of Coventry and wider impacts for the city's heritage. As such, we object to the allocation in respect of the quantum of development sought. In the absence of any assessment of the degree of harm which the preferred site allocation might cause to the historic environment, at present the Plan cannot demonstrate that the site it is putting forward for development is compatible with the Council's own extant, and proposed, policies for the protection of the historic environment. Is the quantum of development achievable at the site taking into account historic environment considerations? Moreover, in terms of national requirements, the Plan also fails to demonstrate that:- The proposed site for allocation would be likely to "conserve heritage assets in a manner appropriate to their significance" as required by NPPF</i>			

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						<i>December 2023 Paragraph 195.- The site that it is putting forward for development will deliver a “positive strategy for the conservation and enjoyment of the historic environment” as is required by NPPF December 2023 Paragraph 196.- The site to be allocated would contribute to protecting or enhancing the historic environment. Therefore, it has not shown that it is likely to deliver sustainable development in terms of the historic environment (NPPF December 2023 Paragraph 7). Therefore, the draft Plan has not shown that it would be likely to deliver the Government’s objectives for the historic environment.</i>			
Historic England (ID19)	Table 6.2 H2: 3 / H2: 15 / H2: 26 /	No response	No response	Y	N	Thank you for consulting Historic England on the Coventry Local Plan Review Regulation 19 Proposed Submission that was published on 20th January 2025. In relation to this consultation document, we have the following comments: General comments Historic England (HE) has previously advised, in our response to the Coventry Local Plan Review Regulation 18 consultation, that the Plan should be accompanied by heritage assessments for the proposed site allocations to assess the impact of development on the significance of designated and non-designated heritage assets and	Specific comments Policy H2: Housing Allocations Site Ref: H2:3 Walsgrave Hill Farm - <i>Historic England notes the proximity of this proposed site allocation to the Grade II* Registered Park and Garden (RPG) of Coombe Abbey. Whilst we have no comments to make in relation to the impact of</i>	Further discussions are underway with Historic England and a SoCG is to be agreed.	No change

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	H2: 27 / H2: 33 / H2: 36 / H2: 37 & H2: 38					their settings. To ensure that plans are positively prepared Historic England advises undertaking the process of the 'Site Selection Methodology' as set out in Historic England's Advice Note 3 The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3):https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/At the Regulation 18 consultation stage we also recommended that detailed Heritage Impact Assessments (HIAs) are prepared, either by, or on behalf of, the Local Authority, with reference to Historic England's Advice Note 3 The Historic Environment & Site Allocations in Local Plans, 2015 (HEAN3) and Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3):https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritageassets/With specific reference to non-designated heritage assets, these can make a positive contribution to the character of our settlements and enrich our sense of place. We recommend that the views of your chosen specialist archaeological adviser are sought on these allocations to	<i>the development on this RPG, we suggest that the development should look for opportunities to connect with the green space/cluster of trees at Hungerley Hill, which may have once been part of this designed landscape. Site Ref: H2:15 Land at Sandy Lane –We note that this is the site of the former Daimler car factory (Britain's first car manufacturer). The Daimler Powerhouse (former car factory building, now a creative hub) is designated as a building of local interest, included on the Council's 'Local List' and the northern part of the site</i>		

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						confirm that the evidence base is sufficiently robust to ensure that any proposed allocation is deliverable in accordance with local and national planning policies. Your adviser will inform you on whether further assessment work is required through field assessment prior to allocation to ensure the extent, character and significance has been adequately understood to inform the allocation of a site. In terms of the evidence accompanying the Regulation19 Proposed Submission Plan, HE welcomes the November 2024 'Design and Heritage Background Paper'. HE notes that this sets out the rationale behind the Plan's policies on design and heritage but does not specifically address any assessments in relation to the historic environment for the proposed site allocations. HE notes that the 'Housing and Employment Land Availability Assessment' (HELAA), November 2024, includes individual site assessments, which take into account the 'Major Planning Considerations' of Conservation Areas and 'identified' heritage assets and also 'Other planning considerations', which include 'Built Environment and Heritage'. We particularly note that the methodology for the HELAA assessments encompass under 'Heritage Assets' that:	<i>falls within the Coventry Canal Conservation Area. HE therefore recommends that the advice of the Council's local specialist conservation officer is sought. Site Ref: H2:26 Coventry Central Police Station, Little Park Street – HE notes that the eastern half of site lies within View Cone 8: Mile Lane & the western half within View Cone 10: Quinton Road, as defined in the Council's 'Tall Buildings Design Guide and View Management Framework SPD'. The site also is situated near to the High Street Conservation Area and to Christchurch Steeple (GII* Listed).</i>		

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						<i>'Sites likely to affect an identified heritage asset are normally deemed unsuitable due to the unknown impact of the development. The presence of a heritage asset does not always prevent development, but the type and nature of the constraint would need to be addressed and mitigated before the site could be deemed suitable for development' & that the 'Solution' provided is that 'A Heritage Impact Assessment would be required, prepared in consultation with relevant agencies, to assess the potential impact of any future development'. This is the first opportunity we have had to consider the proposed site allocations and despite the site assessments in the HELAA, HE considers that there is no meaningful assessment in relation to the significance of, and likely impact of the development on the significance of, and the setting of designated and non designated heritage assets and it has not been possible to locate any other evaluation of impact within the consultation information. In relation to specific site allocations, we have serious concerns about the lack of heritage evidence and the deliverability of H2:30 and H2:32. These are the subject of separate representations. In relation to several other proposed</i>	Whilst the 'Essential Site Specific Requirements and Other Uses' listed in the Plan requires that development here is sensitive to these View Cones, HE considers that a Heritage Impact Assessment should be required at planning application stage to inform the deliverability of the 600 units estimated, as we have concerns that such a capacity would necessitate particularly tall buildings, with potential harmful impacts for the historic environment. Site Ref: H2:27 New Union Street Car Park –HE notes that the entire site lies within View Cone 9: Mile Lane		

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						site allocations, we would make the following suggestions, set out under 6. below, in order to ensure that the Plan sets out a positive strategy for the conservation and enjoyment of the historic environment.	(Christ Church) as defined in the Council's 'Tall Buildings Design Guide and View Management Framework SPD'. The site also is situated near to the Greyfriars Green Conservation Area, the High Street Conservation Area, the Listed Grade II* Register Office and Christchurch Steeple (also listed as GII*). Whilst the 'Essential Site Specific Requirements and Other Uses' listed in the Plan requires that development here is sensitive to this View Cone, HE considers that a Heritage Impact Assessment should be required at planning application stage, as we		

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							have concerns that the deliverability of 170 units estimated would necessitate tall buildings, with potential harmful impacts for the historic environment. In addition, the South end of allocation is close to the site of Cheylesmore Gate and the alignment of the City Wall. HE considers that detailed work is required to inform the potential for archaeology and that opportunities to better reveal the former alignment of the City Wall and former gate should be explored where the potential is confirmed. We therefore recommend that the policy wording of the		

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							allocation should request an archaeological assessment at planning application stage and that development should consider incorporating green space into the southern-most area of site to create flexibility in the design to conserve archaeological remains in situ where present. Site Ref: H2:33 The Allesley Hotel, Birmingham Road – HE welcomes that the retention and enhancement of adjacent listed buildings and heritage assets is included within the 'Essential Site Specific Requirements and Other Uses' listed in the Plan under Policy H2 for		

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							this site. However, the hotel itself at the frontage of the site is a non-designated heritage asset and HE considers that this building should be retained, as it makes a positive contribution to the Allesley Village Conservation Area, within which the site is situated. We recommend that this requirement be added to the '<i>Essential Site Specific Requirements and Other Uses</i>' listed in the Plan under Policy H2 for this site. There is also the potential for the re-development of the site to emphasise the former boundary of Allesley Park which is associated with		

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							the historic parkland that surrounded the former house of Allesley Park and Allesley Castle Scheduled Monument. HE recommends that a Heritage Impact Assessment should be required to be submitted with any planning/Conservation Area applications for the site. <i>Site Ref: H2:36 Land at Spon End</i> –We note that part of the site lies within the Spon End Conservation Area and the site includes a Scheduled cast iron single-span bridge (which was moved to the site in 1969). HE recommends that a Heritage Impact Assessment should be		

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							required at planning application stage and that a masterplan should also be required for the site at planning application stage to demonstrate linkages between the historic environment and the green/blue infrastructure which forms the setting for the bridge. We note that as the bridge is a Scheduled Monument HE will need to be involved in discussions. <i>Site Ref: H2:37 City Centre South</i> –HE notes that this site now has planning permission, with a S106 Agreement for the relocation of the Grade II listed Mural and that HE gave advice at that stage. We recommend that any		

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							opportunities to better reveal the former alignment of the City Wall and gate, through archaeological investigation, should be explored. Site Ref: H2:38 Friargate – Land bounded by Railway, Grosvenor Road, Manor Road, and including Greyfriars Green and Station Square –HE notes that this was allocated site in the adopted Plan, but that the mix has now changed through the planning consents. We recommend that any opportunities to better reveal the former alignment of the City Wall and site of Greyfriars Gate, through archaeological		

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							investigation, should be explored. We hope that the above comments will assist but if you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me. Finally, we should like to stress that this opinion is based on the information provided by the Council in its Regulation 19 consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an		

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							adverse effect upon the historic environment.		
Environment Agency(ID15)	H2	Y	Y	N	No response	Since the Issues and Options consultation and based on the information included in the Proposed Submission document, we understand new site allocations are proposed to meet the increased housing need within the Plan Review. Comparing Table 6.2 'Site Allocations for Housing' to the adopted Local Plan allocations, we understand allocations H2:26 – H2:38 are new and have not been previously allocated. We are aware of at least one of these new allocations, H2:36 Spon End, being at risk from fluvial flooding. Comparing the sites assessed through the Housing and Economic Land Availability Assessment (HELAA (November 2024)) in comparison to the proposed allocations, we also note allocations H2:37 and JE2:2 have both been identified as being in the flood zone. However, both sites either have permission granted or have been delivered. We note Table 2 in the HELAA sets out how planning considerations have been assessed for the purposes of the HELAA assessment. With regards to the flood risk, the Table states: 'Flood Risk Sites located within Flood Zones 2 or 3 or which are subject to <i>surface water flooding, will need a more</i>	A Level 2 SFRA should still be undertaken to further inform the site allocations which are identified via the Level 1 SFRA (and/or the HELAA) as being at risk of flooding. It will also enable your Council to address paragraphs 172, 178 and 179 of the National Planning Policy Framework (NPPF) which relate to the Sequential and Exception Tests. The Level 2 assists with part (b) of the Exception Test, in demonstrating that the development will be safe for its lifetime taking account of the vulnerability of its users, without	SoCG agreed with the EA	See SoCG

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						<i>detailed site assessment. Any flood risk would need to be assessed and mitigated before the site could be deemed suitable for housing. 'With a proposed solution of 'Most types of flood risk can potentially be addressed through design and engineering solutions in consultation with the relevant bodies, but this may impact on the viability and developable area of the site. 'It is unclear what further assessment has been carried out for allocations identified as being within Flood Zone 2 and 3, particularly for H2:36 Spon End. In line with the recommendations set out in paragraph 1.3 of the Level 1 Strategic Flood Risk Assessment (SFRA (October 2022)) and the National Planning Practice Guidance (NPPG), where allocations are proposed in flood risk areas, a Level 2 SFRA is usually required. Whilst we note allocation H2:36 comprises of regeneration of an existing residential site, the allocation is for 750 dwellings, an uplift of 300 homes on site currently. We note the HELAA refers to the need for new build development on this site to be designed such that flood risk is mitigated and confirms with the policy requirements of EM4 Flood Risk Management. We do welcome the essential site-specific requirements also</i>	increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. The Level 2 SFRA assesses the site-specific risks informing the Councils determination on the overall deliverability and acceptability of the site allocation. It will help to determine what capacity of development will be possible within the site boundary. It will need to demonstrate that any potential mitigation measures could protect the site and would not increase flood risk elsewhere taking account of the latest climate change guidance. This may require the running of new or		

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						identified in Table 6.2 in respect of allocation H2:36 Spon End - <i>“Enhancement and improvement to the River Sherbourne and consideration given to the associated floodplain. Majority of the site is in Flood Zone 2 and part with Flood Zone 3.”</i> However, a Level 2 SFRA should still be undertaken to further inform the site allocations which are identified via the Level 1 SFRA (and/or the HELAA) as being at risk of flooding. It will also enable your Council to address paragraphs 172, 178 and 179 of the National Planning Policy Framework (NPPF) which relate to the Sequential and Exception Tests. The Level 2 assists with part (b) of the Exception Test, in demonstrating that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. The Level 2 SFRA assesses the site-specific risks informing the Councils determination on the overall deliverability and acceptability of the site allocation. It will help to determine what capacity of development will be possible within the site boundary. It will need to demonstrate that any potential mitigation measures could protect the site and would not increase flood risk	additional flood models in line with the EA’s flood modelling guidance. Your Council will need to ensure a Level 2 SFRA is prepared and the site assessment outcomes inform decisions on site deliverability, the Sequential and Exception Tests and site policies and design guidance. The SFRA consultants will need to screen sites requiring a Level 2 Assessment. Further guidance on preparing SFRAs is available at How to prepare a strategic flood risk assessment - GOV.UK (www.gov.uk). Further to our email in July last year, you will also be aware of the EA’s imminent plans to		

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						elsewhere taking account of the latest climate change guidance. This may require the running of new or additional flood models in line with the EA's flood modelling guidance. Your Council will need to ensure a Level 2 SFRA is prepared and the site assessment outcomes inform decisions on site deliverability, the Sequential and Exception Tests and site policies and design guidance. The SFRA consultants will need to screen sites requiring a Level 2 Assessment. Further guidance on preparing SFRA's is available at How to prepare a strategic flood risk assessment - GOV.UK (www.gov.uk). Further to our email in July last year, you will also be aware of the EA's imminent plans to publish new versions of the Flood Zones. As living documents, we would expect the Level 1 SFRA to be updated to include the new flood zone information. More information about the new NaFRA2 information can be found here: New national flood and coastal erosion risk information - GOV.UK	publish new versions of the Flood Zones. As living documents, we would expect the Level 1 SFRA to be updated to include the new flood zone information.		
Kay Farrer (ID24)	H2			N	Y	Strategic Policy: H2 Housing Allocations Table 6.2 - Site Allocations for Housing Heading states: 'Total Dwellings' The words 'Total Dwellings' remains the same in the Coventry Local Plan Review Regulation	Strategic Policy H2: Housing Allocations	The heading in table 6.2 has been carried through from the adopted local plan and so is consistent,	Amend the 'Total Dwellings' heading in

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						19 as it was stated in the adopted 2017 Local Plan. Over the last few years, the word 'Total' has caused confusion amongst residents, councillors and members of the planning committee alike. When planning officers have referenced this policy, in applying the word 'minimum', which is used in other policies, it appears to make the word 'Total' ambiguous, which in my view, leads to uncertainty and a lack of clarity. I believe it is likely that any reasonable reader would understand that the word 'Total', (as stated and in the context of Policy H2), would mean the whole number/whole amount of dwellings. For these reasons, I consider Policy H2, Table 6.2 Heading 'Total Dwellings' to be unsound.	Table 6.2 - Site Allocations for Housing Heading states: 'Total Dwellings' I would suggest the revised wording for Table 6.2 Site Allocations for Housing Heading should be: 'Assessed Capacity Number of Dwellings' This would reflect the language used in the Housing and Economic Land Availability Assessment, (November 2024, [HELLA]) and link to the 'HELLA ref.' that is also in Table 6.1 Heading Where the HELLA reference is given in Table 6:2 - Site Allocations Heading; it is the assessed capacity figure that is given in Table 6:2.	but Officers acknowledge that the wording is not clear or precise and so a modification to clarify the heading in table 6.2 can be considered.	table 6.2 so it provides a clearer description of the dwelling figures.

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							With other site allocations promoted through the Strategic Housing Land Availability Assessment (January 2016); it is the assessed potential (net) number of units (dwellings) figure that is given in Table 6.2. In my view, the suggested revised wording 'Assessed Capacity, Number of Dwellings' would give clarity and certainty and support the soundness of the plan.		
Lucy White Planning Limited on behalf of	H2	Y	Y	N	N	Policy H2 – Walsgrave Hill Farm The proposed allocation site is affected by a 132kV overhead line which crosses the southern portion of the site. No reference is made to the presence of the line in Policy H2. The policy wording should be amended to acknowledge its presence and the need to safeguard the line and retain in situ through the development process.		This would be part of the Development Management process when detailed plans would be submitted.	No change

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Respo ndent / organi sation / agent	Sec tio n	Com plies with Duty to Coop erate Y/N	Leg ally Co mpl iant Y/N	Soun d Y/N	Does respo ndent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Nation al Grid Electri city Distrib ution (South West) Plc (ID26)									
Sport Englan d (ID55)	H2: 19	Y	Y	N	N	Sport England note the continuation of the employment land allocation JE2:4 Land at Baginton Fields and South East of Whitley Business Park and housing allocation H2:19 Land at Mitchell Avenue, both sites include playing field land which could be lost as a result of the development of the sites. It is also noted that Policy GE2 Green Space allocates two sites for the provision of new sports pitches, to support the allocation of JE2:4 and H2:19. Sport England are unable to identify the potential replacement playing field sites highlighted in Policy GE2, with the site not appearing to be displayed within the	Sport England consider all site allocations which would result in the loss of playing field land (and ancillary provision) should be subject to Policy GE2 to ensure compliance with the requirements of NPPF paragraph 104. Sport England therefore consider the below text	The allocations and associated policy wording were assessed and found sound through the process which led to the adoption of the 2017 Local Plan. GE2 refers to replacement sites at Charter Avenue or Coundon Wedge Road. The adopted allocation for Baginton Fields (JE2:4) links to GE2. However adopted policy H2:19 also	Reference alternative provision in GE2 to ensure it is consistent with H2:19.

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						proposal map. As such, Sport England are unable to make an assessment as to whether the two sites would be at least equivalent in quantity and quality to that proposed to be lost at site allocations JE2:4 and H2:19, in line with NPPF paragraph 104b and Policy GE2. Linked to this if there is a loss of provision playing field land, no assessment has been submitted to demonstrate that the playing field land (and ancillary provision) is surplus to requirement in accordance with the abovementioned policies. As part of this a local assessment of need should be provided having regard to the Council's Playing Pitch and Outdoor Sports Strategy 2023. As such it is considered that the allocation of JE2:3 and H2:19 is not justified as it has not been demonstrated how the allocations meet the requirements of NPPF paragraph 104. Consequently, there is no justified reason as why the sites should not be subject to all of the policy requirements set out in Policy GE2.	(strikethrough) should be removed from Policy GE2. Policy GE2 1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation, or it can be demonstrated that..... More specifically, it should be demonstrated that Land at Charter Avenue and Land East of Coundon Wedge Road, proposed replacement sites for allocations H2:19 and JE2:4, meet the	links to GE2 but refers to replacement playing field sites at Charter Avenue, Coundon Wedge Road 'or an appropriate alternative site within the local area as part of this development (in accordance with policy GE2)' . For consistency it would be appropriate to include reference to 'alternative provision' in GE2 to ensure sufficient flexibility. The reviewed plan includes a hook to ensure that the latest evidence is taken into account to inform planning applications	

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							requirements of NPPF paragraph 104b (and Sport England Exception Policy E4). It should be noted that Land at Charter Avenue appears to be an existing playing field site, and it has not been demonstrated that it is not required to meet any shortfalls in playing field provision independent of being mitigation for the loss of proposed site allocation H2:19. If the above, is not demonstrated Sport England consider that GE2 point 4 is deleted to ensure conformity with NPPF paragraph 104:		

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							To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new sports pitches: ~~Land at Charter Avenue (former Alderman Harris School site).~~ ~~Land east of Coundon Wedge Road.~~		
Keith White head (ID25)				N	Y	The table 6.2 heading in Policy H2: Housing Allocations is not sound. This is the same wording as in the current local plan. The wording has led to huge controversy and confusion in many Planning Committees over the last few years as the wording lacks clarity. The words used are “Total Dwellings”. Planning officers in Planning Committees have left themselves open to accusations of misleading Planning Committee members by saying that table 6.2 says the number of dwellings in Policy H2 for a particular development is “minimum”.	To correct the local plan and make it sound, the heading in table 6.2 of Policy H2: Housing Allocations has to be changed to be consistent with the English language so that anyone understanding English is clear of what is meant.	The heading in table 6.2 has been carried through from the adopted local plan and so is consistent, but Officers acknowledge that the wording is not clear or precise and so a modification to clarify the heading in table 6.2 can be considered.	Amend the ‘Total Dwellings’ heading in table 6.2 so it provides a clearer description of the dwelling figures.

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						Even though the table clearly says “Total”. This word lacks clarity. The dictionary definition of total in English is “comprising the whole number or amount”. This is completely different from minimum. The written justification from Planning was that to use the word minimum instead of the actual policy word was “reasonable”. Residents around the City do not agree. In a meeting with Planning, another reason was given. This time we were told that part way through writing the local plan, the Government changed the rules and development quantities could no longer be described as “total”. We were then told that the local plan was changed to meet the new rules but this table was missed and so not changed. When the mistake was noticed we were told it was too late as the local Plan had been signed off. Given the amount of challenges and confusion, it is unacceptable that the error still has not been corrected.	The suggestion is that instead of using “total” that “maximum” is used instead so that there is no confusion.		
Holt Property	H2			N	N	Policy H2 – Housing Allocations Not Sound	Policy H2: Housing Allocations	All identified sites and their capacity figures were assessed by officers.	Delivery on identified sites to be

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Limited (on behalf of land owner at Hawkes Mill Lane (ID20))						- Policy H2 1. is not consistent with national planning policy. X H2 12 - We have an overall concern with the focus of new housing allocations in particular on brownfield sites. Whilst making best use of brownfield land is supported by the NPPF (including Paragraph 123), brownfield development is generally more challenging in terms of deliverability and viability. Thus, the focus of new allocations on brownfield sites likely means less overall affordable housing delivery, for which there is a significant need in the City of some 2,035 dwellings per annum according to the HEDNA. Furthermore, development will be less able to provide necessary infrastructure delivery, to the disbenefit of new and existing residents of the City. - Turning to proposed site allocations, sites that do not meet the definition of Developable as set out in the NPPF Glossary should therefore be removed.	To ensure Policy H2 is sound and complies with national policy, the following modifications are required: 1. Ensure a Deliverable and Sustainable Housing Allocation Strategy The Plan's over-reliance on brownfield sites raises viability concerns, limiting affordable housing delivery and infrastructure provision. Policy amendment required: Introduce a balanced approach to allocations, incorporating both brownfield and greenfield sites to ensure deliverability. Justification: NPPF Paragraph 123	Discussions have been ongoing with site promoters and developers and an updated trajectory position will be provided for the examination.	modified based on latest information acquired and from discussions with landowners .

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							supports brownfield land use, but sites must be viable to provide necessary housing and infrastructure. The HEDNA identifies a need for 2,035 affordable dwellings annually, which brownfield-heavy allocations struggle to meet due to high remediation costs. 2. Remove Undevelopable Site Allocations The Plan allocates sites that do not meet the NPPF definition of 'Developable' due to uncertainty and overestimated capacity. Policy amendment required: Remove these sites. Justification: Sites need to be deliverable.		

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							Conclusion Without these modifications, Policy H2 is unsound. These changes will ensure: • A deliverable and balanced housing allocation strategy. • Accurate housing figures that reflect net new supply. • The inclusion of additional sustainable sites, such as Land to the rear of 147 Hawkes Mill Lane, Coventry, to strengthen housing supply and ensure deliverability. To ensure a robust and justified allocation strategy, the Council should allocate Land to the		

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							rear of Hawkes Mill Lane, Coventry, which is immediately available, well located, and free from major constraints. The site provides a realistic and viable alternative to constrained or uncertain allocations, reinforcing the Plan's ability to meet its housing requirement in full. These modifications are necessary to ensure Policy H2 is positively prepared, justified, and effective under NPPF Paragraph 35.		
Holt Property Limited	H2			N	N	Policy H2 – Housing Allocations Not Sound Policy H2 1. is not consistent with national planning policy.	Policy H2: Housing Allocations To ensure Policy H2 is sound and complies with	All identified sites and their capacity figures were assessed by officers. Discussions have been ongoing with site	Delivery on identified sites to be modified based on

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d (on behalf of landowner of land off Pickford Green Lane) (ID20)						- We have an overall concern with the focus of new housing allocations in particular on brownfield sites. Whilst making best use of brownfield land is supported by the NPPF (including Paragraph 123), brownfield development is generally more challenging in terms of deliverability and viability. Thus, the focus of new allocations on brownfield sites likely means less overall affordable housing delivery, for which there is a significant need in the City of some 2,035 dwellings per annum according to the HEDNA. Furthermore, development will be less able to provide necessary infrastructure delivery, to the disbenefit of new and existing residents of the City. - Turning to proposed site allocations, sites that do not meet the definition of Developable as set out in the NPPF Glossary should therefore be removed.	national policy, the following modifications are required: 1. Ensure a Deliverable and Sustainable Housing Allocation Strategy The Plan's over-reliance on brownfield sites raises viability concerns, limiting affordable housing delivery and infrastructure provision. Policy amendment required: Introduce a balanced approach to allocations, incorporating both brownfield and greenfield sites to ensure deliverability. Justification: NPPF Paragraph 123 supports brownfield land use, but sites must be	promoters and developers and an updated trajectory position will be provided for the examination.	latest information acquired and from discussions with site promoters and developers.

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							viable to provide necessary housing and infrastructure. The HEDNA identifies a need for 2,035 affordable dwellings annually, which brownfield-heavy allocations struggle to meet due to high remediation costs. 2. Remove Undevelopable Site Allocations The Plan allocates sites that do not meet the NPPF definition of 'Developable' due to uncertainty and overestimated capacity. Policy amendment required: Remove these sites. Justification: Sites need to be deliverable. Conclusion		

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Regulation 19: Summary of Representations

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							Without these modifications, Policy H2 is unsound. These changes will ensure: • A deliverable and balanced housing allocation strategy. • Accurate housing figures that reflect net new supply. • The inclusion of additional sustainable sites, such as Land off Pickford Green Lane, Coventry, to strengthen housing supply and ensure deliverability. The site is strategically located next to the Eastern Green SUE, making it an ideal site for future growth. To ensure a robust and justified allocation strategy, the Council		

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							should allocate Land off Pickford Green Lane, Coventry, which is immediately available, well-located, and free from major constraints. The site provides a realistic and viable alternative to constrained or uncertain allocations, reinforcing the Plan's ability to meet its housing requirement in full. These modifications are necessary to ensure Policy H2 is positively prepared, justified, and effective under NPPF Paragraph 35.		
Holt Property Limited	H2			N	N	Policy H2 – Housing Allocations Not Sound Policy H2 1. is not consistent with national planning policy.	Policy H2: Housing Allocations To ensure Policy H2 is sound and complies with	All identified sites and their capacity figures were assessed by officers. Discussions have been	Delivery on identified sites to be modified

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d (on behalf of landowner at Pickford Grange Lane) (ID20)						- We have an overall concern with the focus of new housing allocations in particular on brownfield sites. Whilst making best use of brownfield land is supported by the NPPF (including Paragraph 123), brownfield development is generally more challenging in terms of deliverability and viability. Thus, the focus of new allocations on brownfield sites likely means less overall affordable housing delivery, for which there is a significant need in the City of some 2,035 dwellings per annum according to the HEDNA. Furthermore, development will be less able to provide necessary infrastructure delivery, to the disbenefit of new and existing residents of the City. - Turning to proposed site allocations, sites that do not meet the definition of Developable as set out in the NPPF Glossary should therefore be removed.	national policy, the following modifications are required: 1. Ensure a Deliverable and Sustainable Housing Allocation Strategy The Plan's over-reliance on brownfield sites raises viability concerns, limiting affordable housing delivery and infrastructure provision. Policy amendment required: Introduce a balanced approach to allocations, incorporating both brownfield and greenfield sites to ensure deliverability. Justification: NPPF Paragraph 123 supports brownfield land	ongoing with site promoters and developers and an updated trajectory position will be provided for the examination.	based on latest information acquired and from discussions with landowners

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							use, but sites must be viable to provide necessary housing and infrastructure. The HEDNA identifies a need for 2,035 affordable dwellings annually, which brownfield-heavy allocations struggle to meet due to high remediation costs. 2. Remove Undevelopable Site Allocations The Plan allocates sites that do not meet the NPPF definition of 'Developable' due to uncertainty and overestimated capacity. Policy amendment required: Remove these sites. Justification: Sites need to be deliverable.		

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							Conclusion Without these modifications, Policy H2 is unsound. These changes will ensure: • A deliverable and balanced housing allocation strategy. • Accurate housing figures that reflect net new supply. • The inclusion of additional sustainable sites, such as Land off Pickford Grange Lane, Coventry, to strengthen housing supply and ensure deliverability. The site is strategically located next to the Eastern Green SUE, making it an ideal site for future growth. To ensure a robust and justified allocation strategy, the Council		

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							should allocate Land off Pickford Grange Lane, Coventry, which is immediately available, well-located, and free from major constraints. The site provides a realistic and viable alternative to constrained or uncertain allocations, reinforcing the Plan's ability to meet its housing requirement in full. These modifications are necessary to ensure Policy H2 is positively prepared, justified, and effective under NPPF Paragraph 35.		
Holt Property Limited	H2			N	N	Policy H2 – Housing Allocations Not Sound Policy H2 1. is not consistent with national planning policy.	Policy H2: Housing Allocations	All identified sites and their capacity figures were assessed by officers. Discussions have been	Delivery on identified sites to be modified

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d (on behalf of landowner of land east of Pickford Grange Lane) (ID20)						- We have an overall concern with the focus of new housing allocations in particular on brownfield sites. Whilst making best use of brownfield land is supported by the NPPF (including Paragraph 123), brownfield development is generally more challenging in terms of deliverability and viability. Thus, the focus of new allocations on brownfield sites likely means less overall affordable housing delivery, for which there is a significant need in the City of some 2,035 dwellings per annum according to the HEDNA. Furthermore, development will be less able to provide necessary infrastructure delivery, to the disbenefit of new and existing residents of the City. - Turning to proposed site allocations, sites that do not meet the definition of Developable as set out in the NPPF Glossary should therefore be removed.	To ensure Policy H2 is sound and complies with national policy, the following modifications are required: 1. Ensure a Deliverable and Sustainable Housing Allocation Strategy The Plan's over-reliance on brownfield sites raises viability concerns, limiting affordable housing delivery and infrastructure provision. Policy amendment required: Introduce a balanced approach to allocations, incorporating both brownfield and greenfield sites to ensure deliverability. Justification: NPPF Paragraph 123	ongoing with site promoters and developers and an updated trajectory position will be provided for the examination.	based on latest information acquired and from discussions with landowners

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Respo ndent / organi sation / agent	Sec tio n	Com plies with Duty to Coop erate Y/N	Leg ally Co mpl iant Y/N	Soun d Y/N	Does respo ndent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							supports brownfield land use, but sites must be viable to provide necessary housing and infrastructure. The HEDNA identifies a need for 2,035 affordable dwellings annually, which brownfield-heavy allocations struggle to meet due to high remediation costs. 2. Remove Undevelopable Site Allocations The Plan allocates sites that do not meet the NPPF definition of 'Developable' due to uncertainty and overestimated capacity. Policy amendment required: Remove these sites. Justification: Sites need to be deliverable.		

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							Conclusion Without these modifications, Policy H2 is unsound. These changes will ensure: • A deliverable and balanced housing allocation strategy. • Accurate housing figures that reflect net new supply. • The inclusion of additional sustainable sites, such as Land East of Pickford Grange Lane, Coventry, to strengthen housing supply and ensure deliverability. The site is strategically located next to the Eastern Green SUE, making it an ideal site for future growth. To ensure a robust and justified		

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							allocation strategy, the Council should allocate Land East of Pickford Grange Lane, Coventry, which is immediately available, well located, and free from major constraints. The site provides a realistic and viable alternative to constrained or uncertain allocations, reinforcing the Plan's ability to meet its housing requirement in full. These modifications are necessary to ensure Policy H2 is positively prepared, justified, and effective under NPPF Paragraph 35.		
Marro ns on	H2			Y	Y	These representations are submitted by Rainier Real Estate with specific respect	None	Comments and delivery timescales for Land at	No change

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behalf of Rainier Real Estate Ltd Re Sandy Lane (ID29)						to Policy H2 – H2:15 Land at Sandy Lane – allocated for development of 250 dwellings. Rainier Real Estate has a live planning application which is currently under determination by Coventry City Council (ref. PL/2024/0001869/OUTM). The planning application, submitted in October 2024, was informed by extensive pre-application engagement with the Council. Policy H2 and the allocation of H2:15 is sound, suitable and justified for the following reasons. - H2:15 was allocated for development in the adopted Coventry Local Plan 2017, a plan which was subject to examination and scrutiny at that time. Whilst the allocation was for 90 dwellings, the City Council propose to amend the Site's capacity through the new Local Plan following Regulation 18 representations by Rainier Real Estate, to make best and efficient use of Previously Developed Land (PDL) in accordance with national and local planning policy.		Sandy Lane are noted and the application is being considered through the Development Management process.	

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						- As PDL, the allocation is expressly supported under December 2023 NPPF (paras. 123 and 124(c) and (d) in particular) and the City Council's brownfield-first approach. - The allocation is in a sustainable and accessible location, close to the City Centre, high frequency public transport (with bus stops adjoining), West Midlands Cycle Hire Station and a range of local services and facilities in the Site's vicinity. - The allocation is also deliverable and will make a valuable contribution towards the Council's 5-year housing land supply. There is a willing landowner, who have engaged Rainier Real Estate to promote, secure consent, market and bring forward the Site for development. Assuming outline planning permission is in place in Q2 2025, it is expected that a developer will be appointed and first Reserved Matters will be submitted by Q4 2025, with construction estimated to commence in Q1/Q2 of 2026. - The allocation is supported by the Council's evidence base, comprising Sustainability Appraisal (SA, October 2024, page 73), Housing and Economic Land Availability			

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						Assessment (HELAA, November 2024, site ref: RAD-004-24, page 71). - The Scheme proposed by Rainier will deliver place-making benefits including the opening up of public access between Sandy Lane and Coventry Canal, retention of the existing Daimler Powerhouse (as is sought by Policy H2:15) alongside provision of a new public plaza for this cultural asset to support events and performances, and a new play area for children. A copy of the Design and Access Statement for the submitted outline planning application is enclosed for reference at Appendix A, to support and further articulate these benefits. - Delivery of the Site will also remediate the land, improving the environmental quality of the area. In summary, allocation H2:15 is soundly based and should be included in the Local Plan Review. Rainier Real Estate is committed to working with the Council and key stakeholders, including the local community, to bring the Site forward. [Officer note - see full representation for further information]			

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Newton LDP (ID38)	H2: 6.12			N	Y	Policy H2 – Housing Allocations There is concern that the allocated housing numbers have been deliberately inflated to justify avoiding the release of green belt land. This approach undermines transparency and proper strategic planning. The necessity of meeting housing targets should not come at the expense of realistic development planning, and the plan should ensure that figures are evidence-based rather than manipulated to fit policy constraints. Land at Spon End is identified as an allocation of 750 dwellings, however there are currently residential dwellings on site that would need to be demolished in order for this proposed development to come forward. Accordingly, the net increase in dwellings would be much lower than the 750 new dwellings that is assumed towards the housing allocation. The site at Hawkes Mill Lane is both achievable and deliverable. The site has two points of access and highways work has been undertaken. The landowners are currently in the final stages of bringing a promotion	A more in depth assessment as to realistic housing numbers that can be achieved on draft allocated sites, including a calculation of net new dwellings.	The Council accepts that it should be a net dwelling figure for Spon End and a modification to the policy will be forthcoming. The site allocation is sound in principle.	Delivery on identified sites to be modified based on latest information acquired and from discussions with landowners, including on Spon End which will be changed to the net dwelling figure.

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						partner on board, who will shortly be preparing a planning application for the site. The site is located partially on brownfield land and land that was found to only contribute moderately to the purpose of the Green Belt, when assessed in the June 2015 Joint Green Belt Study, achieving a score of 11/20. When assessed as a standalone site, there is little or no contribution to the Green Belt. The site should be allocated for housing to cater for shortfalls elsewhere within the city which will inevitably occur from a flawed plan, focussed on complex brownfield regeneration schemes and which under provides for housing, including affordable housing. The site is available, suitable and deliverable.			
CPRE (ID12)					Y	Policy H2 Housing Allocations includes Table 6.2 that identifies the sites to be allocated for housing development. It includes rolling forward of many sites in the adopted Local Plan. The large sites that were greenfield (and until the adoption of the 2017 Local Plan, largely in the Green Belt) are listed first.	Sites in the Keresley SUE (H2.1) which do not have a planning permission should be de-allocated and returned to the Green Belt. See objections by local interests and residents in	The allocation figure for Keresley SUE has not been changed as the figure is not set as a maximum and the site is now being delivered through the DM process. The assessment	No change

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						Some sites within the Keresley SUE, Proposal H2.1, are damaging and do not have any planning permission. The Masterplan for Keresley SUE which is supposed to be complied with (Policy H2(2)) has not been used to control development. The Keresley SUE is being developed without the full infrastructure and facilities required by the Plan. Sites in the Keresley SUE (H2.1) which do not have a planning permission should be de-allocated and returned to the Green Belt. See objections by local interests and residents in the Keresley area.	the Keresley area for details. This should be included in the box entry for H2.1 Keresley SUE.	of deliverability and site allocations is robust. The conclusions referred to in the KOGG report are noted, however the council is confident in its approach and evidence base regarding housing figures, density assumptions and windfall figures.	
Marro ns on behalf of Halla m Land (ID28)	H2			N	Y	Policy H2 1. is not consistent with national planning policy. 2. The Policy identifies sites to be allocated for housing development. Sites H2:31 and H2:36 do not meet the definition of Developable as set out in the NPPF Glossary and should be removed. 3. H2:31 Paybody Building, Stoney Stanton Road is proposed for allocation for 280 dwellings. However, the Council's own HELAA assessment identifies that the site is a current NHS facility which is likely to become	Policy H2 1. should remove sites H2:31 and H2:36 from Table 6.2.	The NHS has clarified in their reps their position on the Paybody Building site and a modification to remove this site from the housing figures will be forthcoming. The Council accepts that it should be a net dwelling	Withdraw Paybody proposed allocation and exclude it from supply calculations and update the IDP.

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						available for redevelopment for residential based use or healthcare-based use. The narrative concludes that should the site become available, it is a suitable site for allocation. Given this uncertainty, there is not a reasonable prospect that the site will come forward for housing in the CLPR Plan Period, if at all. 4. H2:36 Land at Spon End is proposed for allocation for 750 dwellings. However, it is noted that this would be facilitated by the demolition of 450 existing dwellings. Thus, the net increase of 300 dwellings should be accounted for, not the entire 750 dwellings as set out.		figure for Spon End and a modification to the policy will be forthcoming.	Update Spon End delivery figure to net dwellings figure.
Marro ns on behalf of Rainie r Real Estate Ltd Re Westw ood Heath (ID30)	H2			N	Y	Policy H2 is unsound with specific respect to the need to allocate additional brownfield previously developed sites, as part of a positively prepared plan (2023NPPF test of soundness 35(a) and that accords with national planning policy (test of soundness 35(d)). 2023 NPPF123 requires that “Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed land” (emphasis added).	Policy H2 should be amended as follows, to introduce an additional allocation for Land South of Westwood Heath Road (FH Roofing Site). Proposed Change H2:39 FHRoofing Westwood 400 (PBSA) PDL Development of c. 400 PBSA to address needs	The deliverability assessment of identified and allocated sites is considered sound and by virtue of the findings in the Green Belt Technical Update Study, and pending the progress of the South Warwickshire Local Plan the Local Plan is not seeking to deallocate safeguarded land.	No change

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						The prioritisation of brownfield Previously Developed Land (PDL) is reiterated through 2023 NPPF124(c) and (d). As explained in response to Policy GB1 and GB2, Rainier Real Estate control2024 HELAA Ref. WES-003-23 / FH Roofing, a brownfield PDL Site to the south of Westwood Heath Road, adjoining the University of Warwick's Core Campus. This Site should be removed from the safeguarded land designation, removed from the Green Belt, and formally allocated for a development of a 400-bed Purpose Built Student Accommodation (PBSA). H2 The need and justification for reviewing Policy GB1 and GB2 is explained in Rainier's accompanying representations to those policies. Not only would it support achievement of national and local policy objectives which require priority to be given to use of PDL, the Site would also assist in meeting the needs of specific groups required by 2023 NPPF60, as well as address the findings of the LPR's Housing Topic Paper. The allocation will help to reinforce Coventry's strengths as a centre for higher education, with the LPR	identified by the University of Warwick in the University of Warwick SPD (December 2024). Will complement consent for the Social Sciences Quarter on land to the east. Existing vegetation and landscaping to the south of the site to be retained as part of the masterplan. WES-003-23		

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						recognising the key sub-regional role of the University of Warwick in Policy DS2 6b. There is an evidential need to allocate the Site for PBSA, aligned with the University of Warwick Supplementary Planning Document (SPD, adopted 3rd December 2024 – Appendix B to these representations). The SPD is clear that the University anticipates “providing 1,200 net additional student bedspaces on or close to campus, either through direct development or in conjunction with private developers (what is known as Purpose Built Student Accommodation).” (SPD, page 14). Site WES-003-23 adjoins the core campus, as demonstrated in Figure 1, and is therefore sustainably located by foot and cycle to University. A further benefit is that the allocation of specific PBSA directly adjoining the University Campus will help to reduce the loss of existing housing stock to HMO conversions in other parts of the City. The Site is suitable and deliverable for allocation, as demonstrated through the vision document enclosed at Appendix C. The Scheme will improve the character and appearance of the area on what is currently a builder’s yard, with a design and masterplan sensitive to views along Westwood Heath			

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						Road towards St John's Rainier's site – adjoining the Core Campus, Social Science Quarter and new Business School Rainier's site – adjoining the Core Campus, Social Science Quarter and new Business School Church, complementary to what is planned as part of the consented Social Sciences Quarter to the east. Rainier Real Estate has an agreement in place with the landowner to bring the Site forward as soon as possible, with Rainier's commitment to bringing the Site forward evidenced through formal pre-application engagement with the Council in Q4 of 2024, and discussions ongoing into 2025.			
Stephen McNought (ID59)	H2		N	N	Y	The comments of Mark Sullivan of CPRE and Merle Gering are adopted in full. Please see attached document headed additional submissions for further submissions.	Please see document attached for further submissions. Please see comments on Policy GB1 and the policies map.	The conclusions referred to in the KOGG report are noted, however the council is confident in its evidence base regarding housing figures, density assumptions and windfall figures. The allocation figure has not been changed for	Reinstate Policy DS4 part c.

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								Keresley SUE as the figure is not set as a maximum and the site is now being delivered through the DM process. DS4 part c was missing in error and will be reinstated.	
Stantec on behalf of SEGRO (ID58)	H2			N	Y	POLICY H2: HOUSING ALLOCATIONS 3.1 SEGRO support the allocation of the Walsgrave Hill Farm site (H2:3) and remain committed to the delivery of this housing allocation, working with Coventry City Council and National Highways in the context of their proposed improvements to the A46 at Walsgrave as well as other stakeholders and consultees. 3.2 The site is suitable and deliverable for housing in the Plan period. This land will be subject to a planning application and development commenced in the Plan period. 3.3 We note Policy H2:3 is tied to the delivery of the new A46 Walsgrave junction, as an essential piece of infrastructure to serve the site. The Development		The update to site H2:3, Walsgrave Hill Farm, is welcomed and the allocation is still deliverable as defined by the PPG.	No change

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Consent Order (DCO) application for the A46 Coventry Junctions (Walsgrave) was submitted to the Planning Inspectorate on 14th November 2024. The notification of decision to accept the application for Examination for an Order Granting Development Consent was issued by the Planning Inspectorate on 12th December 2024, and the examination is expected to start in May 2025. 3.4 The DCO application is projected to be determined around Spring 2026 and subject to this being approved National Highways would expect to commence these works in Autumn/ Winter 2026. SEGRO would propose to submit an outline planning application for residential purposes at this time and to enable a start on site at the point the Walsgrave junction is opened towards the end of 2027. 3.5 SEGRO confirm the delivery of the residential site can come forward ahead of the proposed employment site to the east of the A46, in Rugby Borough. 3.6 SEGRO consider that the following wording of Policy H2:3 is not 'consistent with national policy' and it cannot therefore be considered sound in accordance with paragraph 35 of the NPPF as it does meet the relevant			

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						policy test in the NPPF regarding designated heritage assets: "Retention and enhanced setting of listed buildings at Hungerley Hall Farm.			
Home Builders Federation (ID21)	H2	N	N	N	Y	STRATEGIC POLICY, Policy H2: Housing Allocations <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 56. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination. 57. Although HBF do not comment on specific site allocations, we find this policy is unsound because additional housing allocations are required. We are of the view, for the reasons	Please refer to representation	Site selection and strategy is robust and judged to be sound. Consideration of existing SPDs would be reasonable in line with the PPG and consistent with the adopted local plan.	No change

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						details elsewhere in our representation, so not repeated here, there need to be more housing allocations. This necessitates a need for a green belt review and a revisiting of the spatial strategy of the Plan to enable additional housing sites to be allocated. 58. We would also request that sites are allocated in the policy, and not in the supporting text, so their status is clear to all plan-users including community, developers and planning application appeal inspectors.			
Stanton on behalf of Catesby Estate (ID56)	H2	N		N	Y	5.3 Policy H2: Housing Allocations Quantum 5.3.1 Policy H2: Housing Allocations relates to a number of housing allocations which are listed in Table 6.2 of the Proposed Submission Plan. 5.3.2 Whilst these allocations are not reproduced in this Representation for brevity, the total number of dwellings within Table 6.2 sum to 15,934. It is not clear how these allocations relate to the figures included in Table 6.1 (reproduced above), given that none of the	Required Changes 5.3.9 As with Policy H1, in order for Policy H2 to be considered sound, the Council needs to reevaluate its identified supply, including identifying additional sites for development in order to fully meet its housing	Site selection and strategy is robust and judged to be sound. The evidence base demonstrates the city can deliver its housing requirement on brownfield sites in its boundary.	No change

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						competent figures within that table individually or collectively sum to 15,934 dwellings. Similarly, the total number of homes (31,493) minus the committed supply and/or net completions still does not equal 15,934 dwellings. 5.3.3 The allocations in Table 6.2 appear to include both existing allocations from the 2017 Local Plan, in addition to new allocations, but it is not clear how these allocations relate to the overall housing requirement described above. 5.3.4 Given the lack of clarity in respect of the allocations in Table 6.2, there is a real and genuine concern that the Proposed Submission Plan does not include enough allocations to meet the identified housing requirement. Reliance on Brownfield Land 5.3.5 Whilst the NPPF is clear that brownfield land should be prioritised for development, it is also true that an overreliance on brownfield sites has a detrimental impact in other areas.	requirement over the plan-period.		

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						5.3.6 This includes, for example, deliverability and viability due to complications in arising from issues such as land contamination and remediation. As a result, it is well document that brownfield sites typically deliver less affordable housing than greenfield sites. In the context of Coventry, this potential reduced affordable housing delivery sits against a backdrop of acute affordable housing need. 5.3.7 The Council should accordingly reconsider balancing its supply with the inclusion of additional greenfield sites, such as Land at Gibbet Hill Road – [Officer note: please refer to representation in ‘general’ section for further information on this site.] Soundness 5.3.8 As such, until clarity is provided in respect of the above, it is submitted that Policy H2 is unsound as it is not clear or effective. Catesby Estates must therefore object to this Policy in its current form.			

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Respo ndent / organi sation / agent	Sec tio n	Com plies with Duty to Coop erate Y/N	Leg ally Co mpl iant Y/N	Soun d Y/N	Does respo ndent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						[Officer note: Please refer to full representation for appendices and further information]			
Stride Treglo wn on behalf of Coven try Univer sity (ID61)	H2: 6.1 2	Y	Y	Y	Y	Opportunities exist to release University Group controlled land assets for alternative uses at the periphery of the “academic” estate. Such opportunities could contribute towards wider Council redevelopment ambitions in the area, including residential city-living schemes on surplus land assets. The University Group wishes that Table 6.2 include reference to the refurbishment of Priory Halls (Block H) and redevelopment of the adjacent Priory Street blocks for a residential led scheme with active ground floor uses. The University Group is investigating opportunities to bring forward such proposals as part of its Cathedral Quarter Masterplan (part of the wider Campus Masterplan approach advocated by new Policy CC2) for alternative uses. In relation to the opportunities presented by the redevelopment of the former Civic Centre Site, the residential capacity of the site has not yet been confirmed.	The University Group wishes that Table 6.2 include reference to the refurbishment of Priory Halls (Block H) and redevelopment of the adjacent Priory Street blocks for a residential led scheme with active ground floor uses. The University Group is investigating opportunities to bring forward such proposals as part of its Cathedral Quarter Masterplan (part of the wider Campus Masterplan approach advocated by new Policy CC2) for alternative uses.	Noted, reference is already made in the Local Plan to the university masterplan, which is awaited.	No change

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							This representation is made in the interests of supporting a positive, justified and effective (deliverable) plan. The representation also presents as background evidence the opportunity to capture this redevelopment area within future annual SHLAA updates / Register of Brownfield Sites to underpin future housing supply.		
NHS Property Services (Midlands Office)	H2:31			N	N	As part of the ongoing duty to co-operate between the Local Planning Authority and NHS system partners, a Coventry & Warwickshire ICS Local Estates Forum Coventry estate planning meeting was held on 17 th February. At the meeting, attended by both Local Planning Authority and system partner representatives, including	In the light of the changes to planned healthcare infrastructure provision and the estates planning work, the inclusion of this particular call for sites submission, H2:31, in the calculation of future	Changed NHS plans noted and the proposed allocation for the Paybody Building to be removed from the housing supply figures. The Infrastructure Delivery Plan is to be updated accordingly in	Withdraw the proposed Paybody Building allocation and exclude

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(ID42)						NHS Property Services, the Local Plan Review (Regulation 19 Proposed Submission) was discussed, together with the call for sites submissions. Having reviewed the call for sites form in respect of Allocation H2:31 with LPA colleagues, it was noted that since submission of the original form and plan in September 2023 proposals for healthcare infrastructure provision in this location have changed. Approvals of applications PL 2024/0001653/FUL; PL2024/0000991/FUL AND PL/2024/0000986/LDC for a Community Diagnostic Centre (CDC) and change of use of part to Building from Use Class E Commercial, Business and Service to Use Class F1 (Learning and non-residential Institutions) relate to the Paybody building as described in the application form. The adjacent land shown on the accompanying plan is required for use in conjunction with the day-to-day use of the main Paybody building on completion of the CDC in late summer 2026.	housing numbers has been superseded and it is requested that it be excluded from the calculations for future housing numbers.	terms of the use of the main Paybody Building as a Community Diagnostic Centre to open late 2026.	from the supply calculations and update the IDP.

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						Through the estate planning work there is scope to look at further opportunities in this location for the provision of additional healthcare infrastructure to complement existing provision. That may lead to further healthcare development and the LPA will be engaged as that progresses, in accord with the duty to co-operate, from a policy perspective as well as through the development management process. In the light of the changes to planned healthcare infrastructure provision and the estates planning work, the inclusion of this particular call for sites submission, H2:31, in the calculation of future housing numbers has been superseded and it is requested that it be excluded from the calculation.			
NHS Property Services (London)	H2:31			Y	N	NHSPS considers Draft Policy H2 to be sound as currently drafted. NHSPS own the freehold to the Paybody Building, as identified under draft allocation ref. H2:31.		The Midland office of NHS Property Services has confirmed changed NHS plans for the Paybody building and the Council will withdraw this	Withdraw the proposed Paybody Building allocation

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n Office) (ID41)						Draft Policy H2 identifies the proposed housing allocations to be delivered within the plan period, which includes draft allocation 'H2:31 – Paybody Building' that is expected to deliver residential and/or healthcare-based development, with a potential to provide approximately 280 dwellings. NHSPS supports the principle of draft allocation ref. H2:31 which identifies the potential for redevelopment of the Paybody Building site. For clarity, any quantum of retained and/or re-provided health or other community uses would need to be determined by the local health commissioners (the Integrated Care Board). We would therefore welcome early engagement with the Council in order to provide further detailed comments, regarding the proposed allocation ahead of the submission stage of the Local Plan.		proposed allocation from the housing supply figures. The Council will update the Infrastructure Delivery Plan accordingly in terms of the use of the main Paybody Building as a Community Diagnostic Centre to open late 2026.	and exclude from the supply calculations and update the IDP.
Andrew Baker (ID3)						I own approx 40 acres in the Keresley/Corley area which I wish to be considered for the next local plan. Please do let me know if this is something which the Council would consider.		Comments noted and when the plan is next reviewed a 'Call for Sites' will go out for sites to be	No change

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								put forward to the Council for consideration.	
Natural England (ID37)						Sites of Least Environmental Value In accordance with the National Planning Policy Framework (NPPF), the plan's development strategy appears to avoid areas of high environmental value and which therefore demonstrates that sites of least environmental value are allocated i.e. they avoid designated sites and landscapes. Notwithstanding sites of local significance which others may raise.		Comments noted.	No change
WWT (ID71)	All		N	N	N	Warwickshire Wildlife Trust (WWT) is extremely concerned regarding the Local Plan which includes housing allocations near to important Local Wildlife Sites (LWS) and wider corridors such as the Courdon Wedge, Coventry Canal and River Sowe and doesn't go far enough in term of Biodiversity net gain Targets. There also isn't an up to date Green Infrastructure evidence base.	Remove housing allocations in the Coundon wedge, green belt and near to Local Wildlife Sites, which the Sustainability Appraisal and Housing Site Assessment work hasn't fully assessed, in terms of the environmental impacts. Making it currently unsound.	All identified sites and their capacity figures were assessed by officers and the shortlisted and discounted site selections are considered robust. The local plan review is not proposing any new allocations in these locations.	No change

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						Considering the proposed housing allocations, there are a number of important Local Wildlife Sites which would be significantly impacted including: The Coventry Canal LWS, Lower Stoke LWS, Sowe Valley Stoke Aldermoor to London Road LWS, Rock Farm Sludge Lagoons PLWS, Hearsall Common LWS, Stoneleigh Park PLWS and Stareton Wood LWS, These allocations aren't evidence based as the Housing site assessment and Sustainability Appraisal haven't fully assessed the environmental impacts and nearby assets. Consistent- the plan is not consistent with the National planning policy framework (NPPF) as it includes sites within the green belt without a detailed enough green belt review. As well as sites near to designated Local Wildlife Sites contrary to national policy and Habitat and NERC laws. Which require the Council to legally consider impacts on wildlife in the area.			

H3 - Provision of New Housing

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Define Planning & Design Ltd on behalf of William Davis Homes (ID14)	H3	Y	Y	N	Y	Policy H3 proposes significant changes to the adopted policies including setting standards for new dwellings, both market and affordable. Points a, c and d propose to implement optional standards for residential development in the form of Nationally Described Space Standards (NDSS) and accessible and adaptable homes standards. PPG is clear that <i>“Local Planning Authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans”</i>. Further, it requires that <i>“Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment”</i>. None of the Councils evidence justifies the setting of such standards in the Local Plan such as whether the existing accommodation being provided is inadequate or not meeting needs in its design. In fact the Council’s Housing Background Paper notes that minimum space standards are essential to ensure quality of life, without	Flexibility must be added into the policy itself to ensure sustainable development is not unduly restricted where appropriate justification is provided.	The introduction of NDSS and ‘accessible and adaptable’ homes under the M4 standards of the Building Regulations has been tested through the evidence base (HEDNA and viability assessment) and would be reasonable and sound. The Council seeks to ensure good living standards for all, across the whole city with the evidence demonstrating an increase in the number of elderly people and people with disabilities. The intention to introduce these standards was first	Wording could be added to the explanatory text setting out that M4(3) A or B standards will be applied flexibly and determined on a case-by-case basis by virtue of context and market conditions influencing the viability to

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						any relevant context to support this statement; and states that the viability work has factored in NDSS compliance and the plan is deliverable taking these standard into account, which is fundamentally incorrect. The Viability Report for the Local Plan Review has demonstrated that there are significant viability issues for development in the area. The Council, in requiring all dwellings both affordable and market, to comply with NDSS and accessible and adaptable dwellings standards, will impact the viability of development as well as the densities and affordability achievable on site. The policy should take a flexible approach that will allow for some new dwellings to depart from these standards where there are site-specific constraints or viability issues which provide sufficient justification. Specifically in relation to accessibility requirements the PPG states that <i>“Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable”</i>. The policy		mentioned during the Regulation 18 stage of the Local Plan Review, in July 2023. The Council considers for these standards to come into force once the local plan is adopted in 2026 provides a sufficient transition and notice period for developers. Furthermore, the current adopted Residential Design Guide SPD includes reference to NDSS. Reference to SPDs in point 1b of the policy is considered reasonable.	such a degree across the city.

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						fails to provide sufficient flexibility and therefore is inconsistent with National policy. Point b of the policy requires development to comply with a number of Supplementary Planning Documents and the standards set out within. The PPG is very clear that <i>“Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development”</i>. Therefore, the approach the Council take at point b of Policy H3 is unsound in relying on SPD’s to set standards which not only have additional financial burdens but have not been sufficiently tested through evidence work and examination. Policy H3 as proposed is not sufficiently justified as required by National policy and could unduly restrict the delivery of much needed homes including due to the impact on densities achievable, the type of homes and viability impact.			

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Marrons on behalf of Catesby Estates (ID27)	H3	Y	Y	N	Y	Whilst Catesby Estates is supportive of the Nationally Described Space Standard (NDSS) being used to influence the standard of housing developments in principle, there may be instances where greater flexibility is required in order to meet local housing need. The NPPF (at Footnote 52) is clear that policies which seek to adopt the NDSS may be supported but only where it can be justified. The CLPR lacks this justification. Whilst implementation of the NDSS has been considered in the round in the Viability Assessment, where development proposals have viability challenges the resultant impact on implementation of NDSS may be a reduction in affordable housing provision. In any case, the viability of implementing the NDSS in the CLPR isn't sufficient justification.	Policy H3 should be revised to provide encouragement for NDSS instead of requiring compliance.	The introduction of NDSS and M4 standards of the Building Regulations has been tested through the evidence base (HEDNA and viability assessment) and would be reasonable and sound. The Council seeks to ensure good living standards for all, across the whole city with the evidence demonstrating an increase in the number of elderly people and people with disabilities.	No change
CBRE on behalf of Network Rail (ID7)	H3	Y	Y	N	N	Policy H3 (Provision of new housing), sets out the requirements for the development of new housing, including ensuring it is situated within a sustainable and liveable neighbourhood, taking into consideration the Council's Transport Strategy to have safe access to sustainable transport modes. Criterion 2 notes that new housing development must result in a satisfactory residential environment for neighbouring and future occupiers. Criterion 3	For clarity and so fully consistent with national policy, it is recommended that the Policy or the	The Council does not consider it is necessary to include additional wording as there are already statutory provisions in place in regard to rail and where appropriate these would be taken account of and circumstances will be	No change

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						requires that new developments must not result in existing businesses having unreasonable restrictions placed on them because of the new residential development. Criterion 6 of the Policy specifies the need for sustainable transport provision and that the infrastructure required to support housing development must be considered from the onset and conform to the City Council's adopted Transport Strategy to ensure all sites have easy access to high quality public transport and walking and cycling routes. Network Rail does not object in principle to development, including housing and similar allocations, close to the railway and supports the provisions of Policy H3 which require that new development does not result in existing businesses having unreasonable restrictions placed on them because of the new residential development. It is important that such development does not restrict existing or likely future operational rail requirements in line with the 'agent of change' principle established in paragraph 200 of the National Planning Policy Framework ("NPPF"). For clarity and so fully consistent with national policy, it is recommended that the Policy or the written justification to the Policy confirms that businesses referenced under	written justification to the Policy confirms that businesses referenced under Criterion 3 includes bodies such as Network Rail. It is additionally recommended that the Plan refers to the need for appropriate Asset Protection Agreements	considered on a case-by-case basis.	

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						Criterion 3 includes bodies such as Network Rail. It is additionally recommended that the Plan refers to the need for appropriate Asset Protection Agreements to be entered into to protect railway infrastructure as part of future development.	to be entered into to protect railway infrastructure as part of future development.		
CPRE (ID12)	H3				Y	This Policy is generally supported. It does not mention a requirement for Masterplans. It is the lack of a Masterplan and its setting of requirements for services and facilities that renders new developments unsatisfactory in many locations. The Policy should be amended to include requirements for Masterplans for large and medium housing allocations, with full public consultation on these before they are approved.	Policy H3 should be amended to include requirements for Masterplans for large and medium housing allocations, with full	Policy H3 does not preclude masterplan submissions and therefore is consistent with NPPF 2023 para 74.	No change

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							public consultation on these before they are approved.		
Tetlow King Planning on behalf of the West Midlands Housing Association Planning Consortium	H3	N	N	N	N	Policy H3: Provision of New Housing The WMHAPC previously raised concerns about the blanket application of Nationally Described Space Standards (NDSS) for all new residential developments. There are concerns that the blanket application of the NDSS across all residential development, including affordable tenures, will undermine the viability of many development schemes. This will potentially result in fewer affordable homes being delivered as optional technical standards have implications for build costs and sales values, with implications in turn for development viability. We highlight that the PPG requires local authorities to justify the need for NDSS through considering: • “need – evidence should be provided on the size and type of dwellings currently being built in the area, to	Refer to the previous representation response	The introduction of NDSS and ‘accessible and adaptable’ homes under the M4 standards of the Building Regulations has been tested through the evidence base (HEDNA and viability assessment) and would be reasonable and sound. The Council seeks to ensure good living standards for all, across the whole city with the evidence demonstrating an increase in the number of elderly people and people with disabilities.	Wording could be added to the explanatory text setting out that M4(3) A or B standards will be applied flexibly and determined on a case-by-case basis by virtue of context and market conditions influencing the

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(ID63)						ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. • viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. • timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.” (Paragraph: 020 Reference ID: 56-020- 20150327) In light of the above, it is not clear that the Council has provided evidence demonstrating the need for NDSS across all new developments in Coventry. If the Council continues to seek the NDSS requirement, then it must do so in line with the PPG to ensure the policy is justified and found sound at examination. It is noted that the NDSS is not a building regulation and remains solely within the planning system as a form of technical		The intention to introduce these standards was first mentioned during the Regulation 18 stage of the Local Plan Review, in July 2023. The Council considers for these standards to come into force once the local plan is adopted in 2026 provides a sufficient transition and notice period for developers. Furthermore, the current adopted Residential Design Guide SPD includes reference to NDSS. Reference to SPDs in point 1b of the policy is considered reasonable.	viability to such a degree across the city.

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						planning standard. It is not essential for all dwellings to achieve these standards in order to provide good quality living. It is also relevant that Homes England only requires affordable homes to meet 85% of the NDSS to receive funding. For affordable housing in particular, there may be instances where achieving NDSS is impractical and unnecessary, as it may result in for example, higher rental and heating costs. Homes delivered in the current market by housebuilders are often lower than the 85% requirement. As such, the WMHAPC recommends that other quality standards should be used to determine housing quality, unless the Council can properly evidence the need for NDSS. On sites that deliver 100% affordable housing, NDSS presents issues in that it increases the risk of financial impairment. The WMHAPC members raise that if a property costs more that it is worth, which is often the case on design and build sites that are 100% affordable and in a low value area such as Coventry, then it can cause a financial impairment, or in some cases, a loss. It			

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						is therefore imperative that schemes are able to continue to provide good quality housing but at 85% NDSS (which is the accepted position from Homes England) on sites that are delivering 100% affordable housing due to build costs. The below example has been provided by Aspire Housing Association in relation to a current scheme they have in Coventry, which shows the financial implications of delivering 100% NDSS on 100% affordable housing schemes. <u>85% NDSS</u> Open Market Value per unit average £210k. Build Cost at 85% NDSS per unit plus acquisition and fees, less grant £196,503. Headroom per unit of £13,497 <u>100% NDSS</u> Open Market Value per unit average £210k. Build Cost at 100% NDSS per unit plus acquisition and fees, less grant £213,352. Headroom per unit of £3,352. As can be seen, NDSS can have substantial impacts on viability. If there is an increased risk of impairment,			

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						developers will be more unlikely to deliver new affordable housing. The WMHAPC would like to raise concerns with the draft Policy H3 which requires all new market and affordable housing developments to be built to meet Building Regulations M4(2) standard ('accessible and adaptable dwellings') and for all major residential schemes, 10% should meet the requirements of Building Regulations M4(3) standard ('wheelchair user dwellings'). The WMHAPC accepts that there is a growing need for accessible and adaptable homes, however, there is concern that the 10% requirement for M4(3) dwellings could have considerable implications on viability and overall affordable housing delivery in Coventry. Some sites and/or schemes do not lend themselves to the statutory provision of M4(3) units. In light of this, the WMHAPC requests that the Council exercises an element of discretion when considering proposals.			
Home Builders	H3	N	N	N	Y	STRATEGIC POLICY, Policy H3: Provision of New Housing	Please refer to representation	Self-build and community led housing have been included into separate points 1 and 7 of the policy to highlight the	Angst standards are set out on national

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Federation (ID21)						<i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> <u>Criterion 1</u> 59. The wording of criterion one is confusing and as such ineffective and unsound. HBF would suggest it should be amended to say: All new residential development, including open market and affordable housing, conversions of buildings from non-residential to residential use and self-build and custom-build homes and community led housing, must provide a high-quality residential environment that ensures all new dwellings: <u>Criteria 1a</u> 60. HBF does not support the introduction of the optional Nationally Described Space Standards though policies in individual Local Plans. If the Council wanted to do this, they will need robust justifiable evidence to introduce the NDSS, as any		specific support for them, which followed the representations received at regulation 18 stage and to comply with national policy. The introduction of NDSS and 'accessible and adaptable' homes under the M4 standards of the Building Regulations has been tested through the evidence base (HEDNA and viability assessment) and would be reasonable and sound. The Council seeks to ensure good living standards for all, across the whole city with the evidence demonstrating an increase in the number of elderly people and people with disabilities.	guidance. A link could be added for clarity. Wording could be added to the explanatory text setting out that M4(3) A or B standards will be applied flexibly and determined on a case-by-case basis by virtue of context and market conditions influencing the viability to

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						policy which seeks to apply the optional nationally described space standards (NDSS) to all dwellings should only be done in accordance with the NPPF , which states that “policies may also make use of the NDSS where the need for an internal space standard can be justified”. 61. The NPPF requires that all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The PPG identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly		M4(2) standards is being requested because they are not yet mandatory by Building Regulations. The intention to introduce these standards was first mentioned during the Regulation 18 stage of the Local Plan Review, in July 2023. The Council considers for these standards to come into force once the local plan is adopted in 2026 provides a sufficient transition and notice period for developers. Furthermore, the current adopted Residential Design Guide SPD includes reference to NDSS.	such a degree across the city.

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						assessed, for example, to consider any potential impact on meeting demand for starter homes. Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’. 62. HBF also remind the Council that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council’s policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good, functional home. Smaller		Reference to SPDs in point 1b of the policy is considered reasonable. ANGST standards recommend that provision should be made of at least 2ha of accessible natural greenspace per 1000 population according to a system of tiers into which sites of different sizes fit. Assessment and implementation of this can vary depending on resources available as set out in the ANGST standards practical guide. A link could be added for clarity. National policy requires Local Plans to be read as a whole.	

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						dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. 63. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS. 64. HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.			

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						65. If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date. <u>Criteria 1b</u> 66. This seeks to introduce a Local Plan policy that require new development to comply with three adopted SPDs. It is not appropriate to reference a current or future SPD within a Local Plan Policy wording as this would give SPD Local Plan policy status. The references SPDs also relate to the previous Local Plan and as such may need updating to reflect this new Plan. Any SPD should only be mentioned in the supporting text.			

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						<u>Criteria 1c</u> 67. Criteria c require all new housing development to meet M4(2), HBF note that the requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. The Government response to 'Raising accessibility standards for new homes' states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. This also may simply be impossible for conversions. There is no need for a Local Plan policy on this issue as this issue is already adequately addressed through Building Regulations. <u>Criterion 1d</u>			

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						68. This seeks to require 10% of all new major schemes to meet M(4) 3. It seems disproportionate for this to apply to sites of ten dwelling, requiring one to meet M4(3). There is also a need on a scheme of only ten dwellings. HBF are of the view that this matter should be left to Building Regulations, however if a policy were to be needed, the wording needs to differentiate between Part a) and part b) of M4(3) technical standards. M43a sets out standards for wheelchair adaptable housing, where M43b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights. Any such requirements would also need to be fully considered from a viability perspective. Experience from our membership indicate compliance with M4(3)c is ten times more expensive than compliance with M4(3) b. This matter will need also need to be fully reflected in the whole plan viability appraisal. <u>Criterion 1e</u>			

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						69. This states that “Where possible be located to meet Natural England’s Accessible Natural Greenspace Standards (ANGST) doorstep standards or future equivalent and where this is not possible developer contributes may be sought for local projects identified in the Council’s Blue and Green Infrastructure Strategy and Action Plan. It is unclear from the policy wording what an applicant would need to do to comply with this policy and as such it would be ineffective and unjustified. There is also a need for all the policies in this Plan to work together. In order to be effective and justified the Plan needs to be clearer on how this policy interacts with mandatory Biodiversity Net Gain and other nature protection policies. <u>Criterion 5</u> 70. As the plan should be read as a whole there is no need for criterion 5 which has the potential to			

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						create confusion and as such makes the plan ineffective. It should be deleted. <u>Criterion 6</u> 71. The wording of the policy gives the impression that the Council is seeking to give Local Plan policy status to the Transport Strategy which is not appropriate. Reference to other Council documents can be usefully made in the supporting text, but should not be referenced in the policy itself as this would create confusion around the status of the document referenced making the Plan unsound. <u>Criterion 7</u> 72. As the plan should be read as whole, Criterion 7 which is a repetition of criteria one is not needed. It is unclear and confusing to repeat requirements within the same policy. This is therefore unnecessary and potentially confusing. It should be deleted.			

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Savills on behalf of Bellway Homes and Merton College (ID52)	H3	N	Y	N	Y	Policy H3: Provision of New Housing 4.31. A number of draft changes are proposed to Policy H3. Bellway and Merton College's comments are set out as follows. <i>Part 1</i> 4.32. Under part (1), part (a) requires compliance with NDSS, part (c) requires all dwellings to be M4(2) compliant and part (d) requires 10% of all new dwellings to meet M4(3) requirements. Within the explanation in the Guidance Note on Changes to the Policies, it is confirmed to be demonstrated to be viable. Appendix 1 of the Aspinall Verdi Viability Assessment (August 2024) confirms that NDSS has been applied to all appraisals, and the following costings for M4(2) and M4(3): [Officer comment: Please see full representation] 4.33. Bellway object to the requirements set out, introducing the requirement for all new residential dwellings to comply with Nationally Described Space Standards. The PPG (Paragraph: 003 Reference ID: 56-003- 20150327) states <i>'that Local Authorities should consider the impact of using these standards as part of their Local Plan viability assessment.'</i> Whilst the Aspinall	Please refer to representation	The introduction of NDSS and 'accessible and adaptable' homes under the M4 standards of the Building Regulations has been tested through the evidence base (HEDNA and viability assessment) and would be reasonable and sound. The Council seeks to ensure good living standards for all, across the whole city with the evidence demonstrating an increase in the number of elderly people and people with disabilities. The intention to introduce these standards was first mentioned during the Regulation 18 stage of the Local Plan Review, in July 2023. The Council considers	Wording to be added to the explanatory text setting out that M4(3) A or B standards will be applied flexibly and determined on a case-by-case basis by virtue of context and market conditions influencing the viability to such a degree across the city.

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						Verdi Viability Assessment suggests that this is considered to be viable, the source for this cost data appears to be out of date and not representative of current build costs. 4.34. Additionally, there appears to be no justification within the evidence base for all dwellings to be M4(2) or 10% of dwellings to be M4(3) compliant. The PPG is clear that Local Planning Authorities should take into account the overall impact of such requirements on overall viability. The Aspinall Verdi Viability Assessment appears to utilise out of date information, and is not representative of current build costs. 4.35. The NPPF is clear that an efficient use of land should be made. In requiring all dwellings to be M4(2) compliant and 10% as M4(3) a greater land take is required, ultimately resulting in a lower density of development being achieved. 4.36. It is also requested that clarification is made within the draft policy that these requirements should be met, unless it has been proven to be viably or technically		for these standards to come into force once the local plan is adopted in 2026 provides a sufficient transition and notice period for developers. Furthermore, the current adopted Residential Design Guide SPD includes reference to NDSS. Reference to SPDs in point 1b of the policy is considered reasonable.	

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						unable to do so. Notably, from our experience, it can be difficult to ensure that a scheme is fully M4(2) compliant, especially where a provision of apartments are proposed.			
Jan Weston - Bartholomew (ID22)	H3					A small point – I note that significant developments are required to include 10% of properties to meet Part M4 (3) Wheelchair standard. However Appendix 6, 2.8 notes that 5% of parking provision on new residential developments needs to meet the needs of Blue Badge holders. There could be occasions when providing 10% of units to full wheelchair standard could lead to a need of more than 5%, especially one the needs of visitors to the development are factored in. Could Appendix 6 be reviewed to see if it will cover these eventualities? [Officer comment: Please see full representation for background information.]		Comments noted – this would need to be considered on a case-by-case basis but a modification could be considered to address this point	Potential modification to address this point.
Thomas Willans (ID65)	H3 Paras 6.14 - 6.20	Y	Y	N	N	Coventry's reliance on neighbouring authorities, including South Warwickshire, to address housing needs is compounded by unresolved settlement and Green Belt issues. For example, errors in settlement assessment in the SWLP (e.g., Hatton B1 and proximity to infrastructure like Hatton Station, misidentification of green belt parcels e.g. B1 South of Hatton Park when area B1 is	Reassess the safeguarded Green Belt land to ensure defensible	It is not considered appropriate to change the safeguarded designations as these depend upon the South Warwickshire Local Plan which has not yet reached a sufficiently advanced stage to	No change

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						north) may undermine the ability to deliver sustainable and coordinated development. The safeguarding of Green Belt land along Coventry's southern boundary also risks creating indefensible Green Belt boundaries or misaligned growth patterns if settlement issues in South Warwickshire are not resolved	boundaries in light of unresolved SWLP settlement issues. Strengthen collaboration with South Warwickshire to address settlement and housing allocation issues that impact Coventry's unmet needs. These issues should be addressed	enable conclusions to be drawn.	

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							before adoption of the plan. This strengthened collaboration should include evaluating the outcome of the Regulation 18 South Warwickshire Local Plan consultation.		

H4 - Securing a Mix of Housing

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Marrons on behalf of Catesby Estates (ID27)	H4	Y	Y	N	Y	Whilst it is accepted that the HEDNA provides the starting point for housing mix considerations, as drafted Policy H4 could be interpreted as too onerous for development proposals which aren't listed in part 2, including strategic sites where an alternative housing mix may be appropriate.	Policy H4 should be revised to reference the mix outlined in the HEDNA as a starting point but provide broader flexibility, noting that the location of development can lend itself to a certain element of the HEDNA mix.	The evidence shows the Council is not currently achieving its housing mix and therefore linking the requirement to the most up to date data in the HEDNA or its future equivalent, is considered proportionate, reasonable and justified. There is flexibility in the policy, which requires "a balance of house types and sizes across the city" and which includes part 2 that includes circumstances when the Council would accept developments that don't accord with the HEDNA.	No change
Tetlow King	H4	N	N	N	N	Policy H4: Securing a Mix of Housing	Refer to the previous	Noted	No change

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Planning on behalf of the West Midlands Housing Association Planning Consortium (ID63)						The WMHAPC welcomes Coventry's approach at criterion 2 which sets out various circumstances where it may not be appropriate to follow the housing mix as set out in the including viability constraints, physical constraints associated with smaller sites, locational issues etc. which would allow the opportunity for the delivery of more affordable housing in the authority area. This shows that the Council has taken a flexible approach to ensuring development is being delivered on a case-by-case basis.	representation response		
Home Builders Federation (ID21)	H4	N	N	N	Y	Policy H4: Securing a Mix of Housing <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 73. The wording of this policy merely refers back to the HEDNA. This makes it difficult to assess what the council actually are seeking in relation to the housing mix. I other Local Plans Councils have given an indication of the	Please refer to representation	The evidence shows the Council is not currently achieving its housing mix and therefore linking the requirement to the most up to date data in the HEDNA or its future equivalent, is considered proportionate, reasonable and justified.	No change

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						need or more of certain types or sizes of housing. Although some clearer steer within the policy and/or supporting text would be helpful to ensure the Plan is positively prepared justified and effective, there is also a need for flexibility in the application of policies around housing mix, particularly if the site encounters unexpected viability challenges. Changes the type, size and mix of housing can on occasions assist with improved viability of a site, and this should be an option within the policy. 74. HBF are also very conscious of the challenges that on-site BNG is presenting for some sites, and the impact of delivery BNG may have consequences for the size, type and mix of homes that can variable be provided. This is a further reason for the need for flexibility.		There is flexibility in the policy, which requires “a balance of house types and sizes across the city” and which includes part 2 that includes circumstances when the Council would accept developments that don’t accord with the HEDNA, e.g. due to viability.	

H6 - Affordable Housing

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Watkins Jones Group (ID72)	H6			N	Y	Policy H6: Affordable Housing (5) expects an element of affordable housing as part of PBSA proposals. Despite the viability scenario testing we believe that this approach will not be deliverable in many circumstances and therefore suggest that the policy includes a “subject to viability” clause to allow for all eventualities. Further, sub policy (11) refers to scenarios where affordable housing cannot be physically secured on site, not when a financial payment in lieu is the policy’s affordable housing preferred route. It should therefore be made clear that (11) applies to PBSA tenures.	suggest that the policy includes a “subject to viability” clause to allow for all eventualities. Further, sub policy (11) refers to scenarios where affordable housing cannot be physically secured on site, not when a financial payment in lieu is the policy’s affordable	The evidence base, including the viability assessment, ensures the approach to the affordable housing requirement for PBSA development is justified and sound. The policy does not allow the same ‘subject to viability’ flexibility when requiring a commuted sum on PBSA developments as it does when requiring onsite provision. Wording could be added to points 5 and 11 to reflect that all developments will be subject to viability in line with the NPPF.	Wording could be added to points 5 and 11 to clarify that the commuted sum affordable housing provision for PBSA developments is also subject to viability.

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							housing preferred route. It should therefore be made clear that (11) applies to PBSA tenures.		
Tetlow King Planning on behalf of the West Midlands Housing Association Planning	H6	N	N	N	N	<u>Policy H6: Affordable Housing</u> Criterion 3 of Draft Policy H6 proposes 25% affordable housing on sites of 10 or more dwellings (gross) located within the area identified at Appendix 9(c) on individual sites, or on 'major sites' of more than 1ha. However, this threshold does not align with the NPPF (2024), which defines at paragraph 65 that: <i>"Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).."</i> (Our emphasis).	Refer to previous representation response	The affordable housing threshold is consistent with the approach taken in the adopted local plan. The Council's approach of not asking for affordable housing in the inner-city areas is based on the evidenced in the viability assessment and is robust and justified. This evidence-based approach has allowed the council to lower the affordable housing threshold across the rest of the city and to include a stronger emphasis on delivering a set target of social housing.	No change

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Consortium (ID63)						The definition of 'major developments' is defined at Annex 2 of the NPPF which sets out that: <i>"Major development: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015."</i> (Our emphasis). The above definition of major development as per the NPPF clearly indicates that major sites are defined as sites of 10 or more dwellings or those larger than 0.5ha. The proposed policy 1ha threshold is therefore inconsistent with national policy and would result in fewer sites contributing to affordable housing delivery, reducing overall provision. In light of the above, draft Policy H6 should be revised to align with the NPPF.			

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						Another concern is that at Appendix 9(c) identifies a significant area of the inner city where affordable housing will not be sought. The WMHAPC has significant concerns with this approach as it could lead to a significant reduction in affordable housing delivery across Coventry, but particularly in areas where housing need is often most acute. The inner city often has limited housing supply, inflated rents, and the greatest need for affordable housing, making it essential that contributions are secured in these locations to create a mixed and balanced communities. Paragraph 61 of the NPPF states that “The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.” The exemption of inner-city developments from affordable housing requirements directly conflicts with this principle, potentially leaving a significant portion of the local community without access			

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						to genuinely affordable homes and again would fail to create a mixed and balanced community. Moreover, the Council should be taking proactive steps to meet the identified housing need as set out in the HEDNA, which identifies an annual requirement of 941 Social/Affordable Rental dwellings and 149 Affordable Home Ownership dwellings. Exempting a large part of the city from affordable housing obligations risks undermining these targets and exacerbating affordability issues. It is also unclear whether the decision to exempt inner-city sites from affordable housing has been subject to robust viability testing. Given the high demand for affordable housing, the Council must provide clear evidence to justify this policy approach and ensure it does not negatively impact overall housing delivery. The WMHAPC welcomes the inclusion of flexibility in affordable housing tenures within			

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						the draft policy. In particular, we support criterion 10, which recognises that while the HEDNA serves as a guide, a more evidence-based approach, incorporating engagement with the Council, Registered Providers, and the latest Homefinder data can better reflect local housing needs. We support criterion 12 of draft Policy H6 which states that a reduction in the requirements of Policy EM11 (Energy Infrastructure) may be presented for assessment in order to maximise Affordable Housing delivery. Our comments in response to draft Policy H3 also apply to criterion 14 of draft Policy H6.			
Marro ns on behalf of Rainier Real Estate	H6			N	Y	Policy H6 part 5 exempts development of Purpose Built Student Accommodation (PBSA) within the campus from the provision of a commuted sum towards 20% affordable housing provision. The supporting text to Policy H6 (para. 6.27) explains that the basis for the policy concerns PBSA competing for residential	Policy H6: Affordable Housing - Part 5 "5. On sites providing 25 bed spaces or more of Purpose Built	The Council's approach of requiring a commuted sum from PBSA development proposals which are off campus is based on the evidence in the viability assessment.	A modification could be made as proposed to add clarity and ensure that policy H6 is cross referenced to

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Ltd Re Westwood Heath (ID30)						land, “much of which is required to deliver the urban focussed spatial strategy of the reviewed Local Plan.” On which basis PBSA outside the campus is expected to contribute towards the affordable stock which is needed to retain graduates and young professionals who work in the City. However, clarification is needed in Policy H6 and Policy H10 to ensure that the policy is effective (2023 NPPF test of soundness 35(c)) in realising what the Council is seeking to achieve – to maximise PBSA provision at campus rather than at alternative locations within the City. Fundamentally, it needs to be recognised that existing Campuses may not be able to meet PBSA needs in full. The University of Warwick, for example, has explicitly stated that it may need to look beyond the campus to adjoining sites to meet its needs. H6 The University of Warwick is looking to deliver 1,200 new bed spaces “on or close to campus, either through direct development or	Student Accommodation (PBSA) outside of the Campus (or on land immediately adjacent to the Campus) as defined at policy H10, a commuted sum will be required in lieu of on-site 20% affordable housing provision.	The Local Plan states in policy H10 where PBSA should be located ie within or ‘immediately adjacent’ to campus and policy H6 states ‘outside of campus’. Agreed that modified wording could be added to ensure the policies are effectively cross referenced.	the definition in H10

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						in conjunction with private developers...” (University of Warwick SPD, adopted December 2024, page 14, emphasis added). The fact that PBSA needs to be located “within or immediately adjacent to” the campus is explicitly set out in part 1 of Policy H10. To align the Council’s policy intent set out in para. 6.27, part 1 of Policy H10, and to reflect the specific objectives of the University of Warwick to look beyond its boundaries to deliver PBSA, Policy H6 needs to be amended. The amendments proposed by Rainier Real Estate would not only exempt PBSA from affordable housing commuted sums within the campus, but also PBSA provision on land immediately adjacent to the campus. This will help to truly incentivise PBSA closest to the campus as the Council is seeking to achieve. It will have added sustainability benefits by housing students closest to campus too.			

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Home Builders Federation (ID21)	H6	N	N	N	Y	STRATEGIC POLICY, Policy H6: Affordable Housing Proportion of Affordable Housing <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 75. HBF note that the HEDNA concludes there is an annual need of 941 Social / Affordable rental dwellings for newly forming households and 149 Affordable Home ownership dwellings. This is a high level of need for affordable housing again suggests the Plan should be doing more to deliver more affordable housing, including increasing the housing requirement. <u>Proportion of Affordable Housing</u>	Please refer to representation	The approach to affordable housing provision is considered justified and sound. The viability evidence base has allowed the threshold for when affordable housing is required to be lowered across much of the city. The reference to the Affordable Housing SPD is considered reasonable and sound. BNG costs per unit were included in the construction cost assumptions and the individual residential typologies in the viability assessment. Point 8c is justified and worded flexibly to account for any changes in national policy. It safeguards the city's need for a variety of intermediate home ownership	No change

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						76. Criteria 1, again, this seeks to introduce a Local Plan policy that require new development to comply with an adopted SPDs. It is not appropriate to reference a current or future SPD within a Local Plan Policy wording as this would give SPD Local Plan policy status. The referenced SPDs also relate to the previous Local Plan and as such will need updating to reflect this new Plan. Any SPD should only be mentioned in the supporting text. 77. Criteria 3 seeks 25% affordable housing, but there is not evidence that this is viable as no whole plan viability study has been prepared. Without a Local Plan Viability Assessment, the Plan has failed to fully consider the wide range of challenges and additional costs facing developers at this time. For example, HBF information suggests that complying with the current new		products as evidenced in the HEDNA and makes clear that once any national requirement is taken into account, the remaining requirement should be a different form of affordable intermediate home ownership. The Building Safety Levy coming into force in Autumn 2026 was not included in the viability assessment and is a levy sitting outside of the planning system linked to the building control application process.	

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						part L is costing £3500 per plot. The Future Homes Standard Part L in 2025 is anticipated to cost up to £7500+ per plot. There will also be the addition of the Building Safety Levy that is coming in pay for cladding. This will be a per plot basis around the UK, and initial values are around £2000 to £3000 per plot. 78. Other factors that need to be taken into account include increasing costs of materials and labour due to inflation and the costs of mandatory BNG, which are still emerging as the off-site market is yet to be established. HBF members are reporting costs of £20-30k per off-site BNG unit. Although the initial price of statutory credits is now known this national fallback option has been deliberately highly priced to discourage their use. Whilst this intention is understandable, at present the lack of			

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						functioning local markets for off-site credits causes viability problems because HBF members experience to date suggests that any scheme that needed to rely on statutory credits would become unviable. 79. There is therefore a need to consider the viability implications of statutory BNG and there would be a further need to consider the viability implications that seeking to go further and faster than national mandatory BNG could have on the delivery of affordable housing. HBF agree that there is no reason why Coventry should deviate from DEFRA's conclusion that 10% BNG strikes the right balance between these trade-offs, but as noted in our comments on Policy ENV3 – Nature Recovery and Biodiversity Net Gain (below) the national requirement for			

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						10% BNG is mandatory, and non-negotiable. <u>Tenure</u> 80. Criterion 8 a and b requires a tenure split of 60% social affordable rent (of which at least 50% of that should be for social rent) 40% intermediate. Criterion c references national requirements for intermediate home ownership products and the remainder affordable home ownership products. This criterion of the policy need reviewing as the national policy requirements have changed. 81. The lack of a whole plan viability assessment means the policy is currently not justified and as such the plan is unsound. There is likely to be a need for additional flexibility within the policy to ensure viability, but without			

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						the whole plan viability assessment this remains unknown. <u>Housing Size Mix</u> 82. The lack of a whole plan viability assessment means the policy is currently not justified and as such the plan is unsound. There is likely to be a need for additional flexibility within the policy to ensure viability, but without the whole plan viability assessment this remains unknown. 83. Again, we would request that any current or future SPD should only be mentioned in the supporting text, and not within a Local Plan policy, as this would give SPD Local Plan policy status which is not appropriate. <u>Where a policy compliant provision is not provided</u>			

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						84. Criterion 11 attempts to allow for some flexibility to change the mix of affordable housing to improve viability. Whilst the recognition of this issue in welcome the policy does not go far enough HBF note that the policy already highlights potential concerns within the plan about the cost of the total policy asks. Criterion 12 acknowledges there may need to be a trade-off between the amount of affordable housing sought under policy H6 and the policies which are seeking to go further and faster than building regulations and the Future Homes standard. In seeking higher environmental standards sooner than the market can accommodate there is a risk in undermining wider sustainability objectives including providing housing to meet all need. The fact that the policy allowed for a downgrading of contributions being sought by policy			

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						EN11 if this would enable more affordable housing, draws into question the justification for, and deliverability of the policies in the plan when all taken together. The purpose of the whole plan viability assessment is to help ensure developer contributions in their totality do not place to great a burden on developers that development becomes unviable. 85. We have been unable to find an up-to-date viability assessment as part of the consultation documentation for this Reg 19 Plan. This should have been an integral part of the policy making process and should have been used to help inform both the amount of developer contributions that can be sought, and the split within those contributions. Without this evidence the plan is not justified and may not be			

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						deliverable, and it is therefore unsound. 86. Although HBF welcomes the need for flexibility around viability implied by Criterion 12, to be effective the opportunities for flexibility should be explicit. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. The HBF notes the significant impact that the proportion of affordable housing required can have on the viability of development and the significant challenges identified by the Viability Assessment and recommends that the Council may want to further review this policy to ensure that it is viable and deliverable.			

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						87. The HBF also notes that the costs relating to BNG and achieving net zero carbon homes may be underestimated and further work is needed to justify the costs used. In addition, the Council will also There will also be the addition of the Building Safety Levy that is coming in pay for cladding. This is expected to be introduced in later this year and is estimated to cost in the region of £2,000 to £3,000 per plot on sites of ten more units. The viability assessment will need to be updated to include this additional cost in order for the Council to consider any potential impact on the deliverability of this policy and the local plan in general. <u>Design Standards</u> 88. HBF would again request that any current or future SPD should only be mentioned in the supporting text, and			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						not within a Local Plan policy, as this would give SPD Local Plan policy status which is not appropriate.			
Savills on behalf of Bellway Homes and Merton College (ID52)	H6	N	Y	N	Y	Policy H6: Affordable Housing 4.37. Policy H6 has been amended to reflect that positive weight will be given to schemes which contribute to the delivery of house types which address the Council's long-standing need for larger house types on the affordable waiting list. It must be acknowledged that Coventry are not positively planning to meet housing needs (as set out under Policy DS1 above), which ultimately is hindering the quantum of affordable housing delivered. It is necessary to allocate more sites to meet such affordable housing needs.	Please refer to representation	The council considers its site selection and delivery strategy to be robust and judged to be sound. The evidence base shows the housing requirement can be provided within the city's boundary on brownfield land; density across the city can be increased; and the affordable housing threshold can be lowered across much of the city, thereby maximising housing and affordable housing delivery. Aligning Policies H3, H4 and H6 with the HEDNA will ensure the city's housing need requirement remains up to date.	No change

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Jan Weston-Bartholomew (ID22)	H6					One of the most prominent needs in the country, including Coventry, is the need for adequate housing and balanced development. The importance of building affordable housing units to cater to the city's existing population, along with any increased population, is critical to improve living standards to promote community cohesion. The Local Plan is an instrument that can be used to maximise the provision of all types of Affordable Housing and to make sure that it is truly affordable to local residents. When some of the housing targets are achieved through the very specific and developer led Build to Rent programme it is even more important that the Affordable Housing element of development schemes are maximised. It could be argued that a 25% Affordable Housing provision of sites with 10 or more units is insufficient to meet local housing needs. Something more ambitious could be considered	I would like the Local Plan to commit to maximising Affordable Housing much more robustly and to ensure that when developers ask for viability issues to be taken into consideration an Open Book approach is used with experienced external consultants to interrogate viability assessments.	The approach to affordable housing provision is considered justified and sound. Aligning policy with the HEDNA ensures the city's housing need is up to date. The affordable and social housing provision has been maximised through the evidence in the viability assessment, such as increased densities and a lower AH requirement threshold. The policy seeks appropriate and proportionate flexibility in light of any changes to national policy. Point 8c safeguards the city's need for a variety of intermediate home ownership products as evidenced in the HEDNA and makes clear that once any national requirement is taken into account, the remaining requirement should be a different	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						such as the London Fast Track approach for sites with 35% Affordable Housing provision and 50% where public or industrial land is used. Obviously, the eventual value of properties is lower in the West Midlands than in London but that does not mean that we cannot achieve the maximum possible for our local residents. Once the 25% provision is broken down into its different elements there is actually very little housing being built to benefit those on the lowest incomes in our community. 40% if the affordable housing is to be provided as Intermediate Housing which is usually Shared Ownership, of the 60% rented provision half can be at "Affordable Rent" – which at 80% of record high private rents is unaffordable to many leaving only the other half at Social Rent which at 50-60% of private rents is more manageable financially. On a development of 100 homes only 6-7 would be at Social Rent. Once set against the estimated annual need for 2,816 Affordable Rent/Social Rent each year only the very tip of housing need is addressed.		form of affordable intermediate home ownership. In light of the changes to the affordable housing policy, the affordable housing SPD will be updated.	

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						See https://www.coventry.gov.uk/downloads/file/44022/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna-final-report). Another concern is the affordability of properties. Some local authorities have included tiers of income in their Affordable Housing SPDs such as any shared ownership provision being designated as affordable to people in different income brackets. The Research Briefing into “What is Affordable Housing” published in July 2023 encompasses these issues and lays bare the very real issues of affordability. See https://researchbriefings.files.parliament.uk/documents/CBP-7747/CBP-7747.pdf [Officer comment - please see full representation for background information].			

H7 - Gypsy and Traveller Accommodation

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Rugby Borough Council (ID49)	H7	N/A	N/A	N/A	N	RBC reviewed the Regulation 19 documentation, our comments relate to potential opportunities to fulfil the duty to cooperate. <u>Policy H7: Gypsy and Traveller Accommodation</u> Rugby Borough Council's Gypsy and Traveller Accommodation Assessment (currently in draft and unpublished) identifies a need for 94 pitches 2024-2042. Rugby have identified potential site allocations to deliver circa 46 of those pitches, but a shortfall remains. Considering this, there may be an opportunity for Coventry to accommodate Rugby's unmet need for Gypsy and Traveller pitches from Rugby	N/A	The Council has taken a comprehensive and proactive approach to DtC. This request from RBC is included in the MoU being agreed between the Council and the HMA Authorities and a separate SoCG is being developed with Rugby.	No change

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						Borough and we have written to Coventry City Council to make this request. We understand that provision will be made for at least 6 permanent pitches for Gypsies and Travellers, and suggest that this could be increased to accommodate some of Rugby's projected unmet need. The vast majority of occupied pitches in Rugby Borough are in locations which are within 3km of Coventry's boundary. There is clearly a functional link with Coventry which influences this concentration of pitches in rural areas adjoining Coventry. Providing some of Rugby's unmet development need is consistent with the wording of this policy.			
Tyler Parkes on behalf of PCCWM (ID69)	H7	Y	Y	N	Y	In relation to Policy H7, the PCCWM made the following representation to the Regulation 18 consultation: "The proposed update of the criteria in Policy H7 of the Local Plan are noted and supported by the PCCWM. In addition, it is suggested that reference to 'safety' be expanded to include reducing crime and the fear of crime. It is also considered that the policy should make reference to recommended consultation with Design Out Crime Officers (DOCO) at the pre-application and planning application	The PCCWM considers that reference to 'safety' in Policy H7 should be expanded to include reducing crime and the fear of crime. It is also considered that the policy should make reference to recommended consultation with Design Out Crime Officers (DOCO) at the pre-application and planning application stage, the need	The policy has been informed by the GTAA as the most up to date assessment of gypsy and traveller needs. The plan is to be read as a whole and therefore wording could be added into the supporting text of policy DE1 to require housing developments to consider how they would meet the relevant 'Secured By Design'	Potential modification to supporting text of policy DE1 to require housing developments to consider how they would meet the relevant 'Secured By Design'

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						stage, the need for all proposals to meet Secured by Design principles and the need for a management plan to ensure crime prevention measures are maintained.” The Consultation Statement does not acknowledge this representation, nor is it reflected in the policy itself. However, whilst the PCCWM favours the principle of a policy which supports Gypsy and Traveller Accommodation, nevertheless he considers that further consideration should be given to his recommendations in the interests of reducing crime and the fear of crime accordingly, as set out in the justification in the representation of the PCCWM regarding Policy H13.	for all proposals to meet Secured by Design principles and the need for a management plan to ensure crime prevention measures are maintained. Policy H7 should therefore be amended by the inclusion of a clause such as: 'All proposals will be expected to demonstrate how the relevant 'Secured by Design' principles have been met including the outcome of consultation with Design Out Crime Officers (DOCO) at the pre-application stage and preparation of a management plan to demonstrate how the crime prevention measures will be maintained.	principles (similar to point h of Policy HMO4 of the Council's HMO DPD).	principles (similar to point h of Policy HMO4 of the Council's HMO DPD).
Environment Agency (ID15)						[Officer comment: please refer to full representation for further information].	We note Policy H7 refers to 'adequate sewerage connections'. As outlined previously, your Council may wish to include reference to the foul drainage hierarchy to provide clarity.	This is a Building Regulations document and doesn't need to be repeated in planning policy.	No change

H8 - Specialist Housing including specialist housing with elements of Care, Older Persons accommodation and hostels

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
The Planning Bureau Ltd on behalf of McCarthy Stone & Churchill Living (ID64)	H8	Y	N	N	Y	We welcome Policy H8 as a supportive policy encouraging the delivery of Older Persons' Housing (OPH). We note that the HEDNA (November 2022) shows a shortfall by 2032 of 612 market OPH with support and 360 market OPH with care. [Officer comment: See HEDNA table 4.6 in full representation]. Policy H8 does however, require, where relevant, 10% of proposed dwellings to meet M4(3) standards. It is common for Local Authorities to conflate the needs of 'wheelchair users'	Recommendation The requirement for OPH to provide 10% of dwellings meeting M4(3) standards should be removed unless this is shown to be justified through the Local Plan Viability Report.	The evidence in the HEDNA is clear in showing a need for OPH and a separate need for M4 housing. As a result, the policy has not conflated OPH with M4 standard housing. The requirement for all dwellings to be M4(2) and 10% to be M4(3) is the same requirement as in policy H3 for general housing. A modification could be made to policy H8 to state M4(3) standards will only be applied to major developments as in policy H3. OPH was not included in the viability assessment due to the complexities of a range of different 'products' and	Modification could be made to the explanatory text stating that M4(3) A and B standards will be applied flexibly and determined on a case-by-case basis, given context and market conditions influence the

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						with the needs of older people in the community as has been the case here. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable and accessible housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing. Older people's housing and particularly extra care housing should therefore be incorporated into the emerging Local Plan separately to adaptable and accessible housing and not confused with it.		and an evolving market, and instead result, the policy is worded flexibly in part 4 and therefore considered sound. The wording in Part 4 states: "<u>where relevant, proposals should</u>" meet the M4 standards asked for. M4(2) and M4(3) costs for general housing are factored into the viability assessment in construction costs assumptions and residential typologies. The evidence in the viability assessment, means the requirement for A or B of the M4(3) standards is not specified and is intended to be decided on a case-by-case basis.	viability across the city. A modification could be made to policy H8 to state M4(3) standards will only be applied to major developments as in policy H3.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. This is an area that does not appear to have been tested in the Viability Assessment for OPH, despite our previous response, and the PPG is clear that requiring enhanced levels of accessibility must be tested through the viability testing process¹. It is therefore not possible to show whether this is viable for this typology. M4 (3) Housing has a significant cost implication as modifications are required with respect to fixtures and fittings, services and			

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						controls and room dimensions that are around 30% larger than M4 (2) housing. These additional costs impacts the ability to deliver schemes and affects the affordability of market dwellings, all additional factors that should be considered through a viability study. It is not right to purely rely on a viability study submitted with a planning application as Paragraph 008 of the PPG Viability requires that when a viability assessment is submitted at the development management stage, reference is taken from the plan wide viability assessment underpinning the policy requirement and the applicant is required to set out what changes have taken place since the plan wide viability assessment was undertaken.			

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						If older person's housing is found to be not viable M4 (3) requirements must be removed. 1. https://www.gov.uk/guidance/housing-for-older-and-disabled-people (paragraph 009)			
Home Builde rs Federa tion (ID21)	H8	N	N	N	Y	Policy H8: Specialist Housing including specialist housing with elements of Care, Older Persons accommodation and hostels <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 89. Criterion 4 requires all dwellings to meet M(4) 2 and 10% to meet M4(3). There is a need for the policy to be clear on the a distinction has been made in	Please refer to representation	The evidence in the HEDNA is clear in showing a need for OPH and a separate need for M4 housing. As a result, the policy has not conflated OPH with M4 standard housing. The requirement for all dwellings to be M4(2) and 10% to be M4(3) is the same requirement as in policy H3 for general housing. A modification could be made to policy H8 to state M4(3) standards will only be applied to major developments as in policy H3.	Modification could be made to the explanatory text stating that M4(3) A and B standards will be applied flexibly and determined on a case-by-case basis, given context and market

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						the policy between M4(3)a wheelchair adaptable housing and M4(3)b wheelchair accessible housing. The whole plan viability assessment should be explicit on what costs it has been applying when considering M4(3)a or M4(3)b as the latter can only be sought on affordable housing where the Council has nominations and is considerably more expensive than the former.		OPH was not included in the viability assessment and as a result, the policy is worded flexibly in part 4 and therefore considered sound. The wording in Part 4 states: “<u>where relevant</u>, proposals <u>should</u>” meet the M4 standards asked for. M4(2) and M4(3) costs for general housing are factored into the viability assessment in construction costs assumptions and residential typologies. The evidence in the viability assessment, means the requirement for A or B of the M4(3) standards is not specified and is intended to be decided on a case-by-case basis.	conditions influence the viability across the city. A modification could be made to policy H8 to state M4(3) standards will only be applied to major developments as in policy H3.
Jan Weston-	H8					I would like the Local Plan to give further thought to different types of housing provision for older people. The “old fashioned” sheltered housing	More work could maybe be carried out to look at what older people want to (& expect to provide a range	The policy wording is broad, seeking to encompass and encourage all types of specialist care and older person housing. The Local Plan now	No change

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Bartho lomew (ID22)						schemes have limited appeal. Whilst demand is still strong for very good schemes or very located ones up and down the country councils are struggling with hard to let properties. [Officer comment: Please see full representation for background information].	of housing solutions). One possible housing option for a minority of people could be co-living, although with rolling tenancies rather than the 12-month suggested for younger people. Adult social care is a difficult area for local and national government to work through but it is the key for many people and for housing policy but there is little mention of it in the Local Plan.	includes a separate policy on co-living to show specific support for other and emerging housing types.	

H9 - Residential Density

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Stantec on behalf of SEGRO (ID58)	H9			N	Y	POLICY H9: RESIDENTIAL DENSITY 4.1 SEGRO support Policy H9 for residential development to make the most effective and efficient use of land as this reflects the objective of Section 11 of the NPPF for planning policies and decisions to promote an effective use of land in meeting the need for homes whilst also achieving appropriate densities. However, SEGRO consider that if this aspiration is to be achieved then the Policy should be amended to reflect that the densities in Part 3 of the Policy should be a minimum and the permissible densities of each development site should be determined on a site-by-site basis. 4.2 The consequence of this change would mean that the Policy would not set a limitation on sites from delivering higher densities where it is appropriate and suitable to do so, and those sites would be able to provide a greater contribution towards meeting the Council's housing land requirements. In view Policy H9 can then be considered		The policy is planned positively and reasonably by not setting explicit maximum or minimum density figures. The policy seeks the best use of land whilst understanding that many factors can influence density on a site. The policy maximises housing and affordable housing delivery by increasing the density expectations across the city compared to the adopted local plan	No change

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Respo ndent / organi sation / agent	Secti on	Compl ies with Duty to Coope rate Y/N	Legally Compl iant? Y/N	Sound Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						to be 'consistent with national policy' and in accordance with NPPF paragraph 35. 4.3 We consider the Site is deliverable housing allocation. We are aware that the Flood Maps for Planning (the Flood Zones) are expected to be updated in March 2025 (they have not been made publicly available at this time) and once available a further assessment of the site to inform the development will be carried out. 4.4 SEGRO intend to enter in to a Statement of Common Ground with Coventry City Council in relation to the availability and deliverability of this Site, ahead of a future Local Plan Examination. [Officer comment: See full representation for details]		and introduces a new transition zone.	
Home Builde rs Federa tion (ID21)	H9	N	N	N	Y	Policy H9: Residential Density <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 90. The policy and supporting text may need updating to reflect the implications of BNG. This will impact on the density of housing schemes	Please refer to representation	The approach to density is considered positive and proportionate by not setting explicit minimum or maximum density figures. The policy seeks the best use of land whilst	No change

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Respo ndent / organi sation / agent	Secti on	Compl ies with Duty to Coope rate Y/N	Legally Compl iant? Y/N	Sound Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						that can be provided, as land used for on-site BNG is not available for housing. 91. HBF are concerned that the deliverability of high and super high density residential development in Coventry will be dependent upon the viability of brownfield sites and the demand for high density city centre living post Grenfell and post Covid-19. It is important that delivery of the housing requirement in Leicester does not rely overly ambitious and un-realistic intensification of dwellings within the City, that results in any under-provision and/or under delivery of housing numbers.		understanding that many factors can influence density on a site. Each case will be determined on its own merits and proposals will need to comply with the plan as a whole, which includes policies on amenity space, BNG, etc. Point 2 of the policy requires proposed densities to be informed by a site's local character and context. The Local Plan identifies a variety of housing land within all density areas of the	

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								city and is not overly relying on dense city centre schemes for housing delivery.	
Savills on behalf of Bellwa y Homes and Merto n Colleg e(ID52)	H9	N	Y	N	Y	Policy H9: Residential Density 4.38. It is noted that Policy H9 has been amended to confirm that density should be informed by a site's local character and context. However, it is noted that part (3) suggests that new developments should seek to deliver certain densities, including 35dph for greenfield sites and 45dph for brownfield sites. 4.39. Part (3) should be amended to confirm that these densities are either an approximate or a minimum, and not a maximum, as it is unclear from the current wording.	Please refer to representation	The approach to density is considered positive and proportionate by not setting explicit minimum or maximum density figures. The policy seeks the best use of land whilst understanding that many factors can influence density on a site. Each case will be determined on its own merits and proposals will need to comply with the plan as a whole, which includes	No change

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								policies on amenity space, BNG, etc. Point 2 of the policy requires proposed densities to be informed by a site's local character and context.	
KOGG/ Merle Gering (ID32)	H9	N		N	Y	The updated density policy H9 is supported particularly H9 (1) which puts the onus on developers to make efficient land, something not included in all plans.		Support for the policy is noted.	No change

H10 - Student Accommodation

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The Coventry Society- Tim Brown (ID10)	H10	Y	Y	N	Y	1. <u>Introduction</u> Our interest centres mainly on the impact of an oversupply of purpose built student accommodation (PBSA). We welcome the debate generated by the Regulation 18 and Regulation 19 consultations. In particular, we acknowledge the Council's recognition that the student housing market has changed considerably since 2016/17 when the current Local Plan was drawn up and approved. We also recognise the usefulness of the independent report on student accommodation by Cushman & Wakefield in 2024. 2. <u>Student Housing Provision</u>	Policy H10.1: The policy is not sufficiently specific. There is no definition of 'immediately adjacent'. 'Exceptional circumstances' are not defined. PBSA development must be located within the University of Warwick Campus or the Education and Enterprise area of the City Centre	Responses to the points raised in '3. Our view': Applications for change of use from PBSA to other shared, serviced or short term let accommodation will be determined on their own merits. Imposing restrictions on certain proposed uses is not considered reasonable with no evidence to justify it. The monitor and manage approach is considered to be the most reliable way to determine the PBSA needs of the city as it will provide	Some further clarification could be added in to supporting text where needed or in the glossary to clarify the term 'immediately adjacent'.

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						<i>2.1. Current position</i> Our key point is that there is an oversupply of PBSA primarily in the city centre. According to Cushman and Wakefield, there were in 2023/24, nearly 25,600 PBSA units (with a further 2,970 units in the development pipeline in March 2024). Oversupply has been highlighted for a number of years e.g. - Higher Education Policy Institute (HEPI) identified in August 2023 that “in Coventry there will be an extra 1,136 beds in 2023/24 in a market that already has a surplus estimated at 6,000”¹ and the HEPI update in February 2024 repeated that for 2023/24 Coventry is “over-supplied” and that Coventry University will be downsizing by 30 per cent² - By February 2025, we are aware of at least six recent requests / planning applications by PBSA	(as defined in policy CC1 (part E)). Proposals must be accompanied by evidence of need for additional student accommodation and support from the universities in the form of a nominations agreement. H10.2: Given the over-supply of PBSA, a monitor and manage approach is inappropriate. We believe that proposals outside	the most up to date data. If a need is not identified then the policy is worded so that a proposal would be refused unless built on campus. The word ‘immediately’ was purposefully included before ‘adjacent to campus’ to provide clarity that it refers to those sites that physically share a common border with / adjoin the campuses.	

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						owners and managers to vary planning permissions by, for instance, a more flexible use to include serviced short-term accommodation - In the case of an application for Axo Student Living Scheme in Paradise Place, the supporting planning statement indicated that the vacancy rate in 2023/24 was 37% (i.e. 658 units occupied and 382 rooms vacant) - A further example is Manor Park Court where Erec Estates have applied for a change of use for three years of all 79 units for flexible short-term residential use – the application states that occupancy by students is low and not at a sustainable level - Cushman & Wakefield's independent report summary (paragraphs 1.16 – 1.18) provides further information on the impact of over-supply on the behaviour of providers e.g. discounting of rents such as cashback at the time of bookings, free bus passes to Warwick University, referral payments, and group booking discounts.	our suggested areas in H.10.1 should normally not be supported. PBSA proposed outside of the areas identified in H.10.1 will not normally be supported, unless exceptional circumstances apply. These include a replacement for an existing PBSA that is unsuitable because of design and layout, or because the site of an existing PBSA is required for other university uses		

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						2.2. <i>Future prospects</i> Cushman & Wakefield use student to bed ratios to assess current and future prospects. Their evidence is summarised below: <table><tr><td></td><td>Local student to bed ratio</td><td>Nationally observed student to bed ratio</td><td>Comment</td></tr><tr><td>2021/22</td><td>1.7:1</td><td>2.12:1</td><td>Nationally observed ratio is assumed to be a satisfactory market figure</td></tr><tr><td>2030/31</td><td>1.46:1</td><td></td><td>Assumption of no</td></tr></table>		Local student to bed ratio	Nationally observed student to bed ratio	Comment	2021/22	1.7:1	2.12:1	Nationally observed ratio is assumed to be a satisfactory market figure	2030/31	1.46:1		Assumption of no	H10.4 and 10.5: Clarity required on ‘predominantly studio ratio’ and ‘predominantly cluster units of no more than 8 units’ We suggest the use of nationally recognised room types and building configuration. PBSA proposals should comprise ensuite accommodation in a cluster of no more than 8 individual rooms / units.		
	Local student to bed ratio	Nationally observed student to bed ratio	Comment																		
2021/22	1.7:1	2.12:1	Nationally observed ratio is assumed to be a satisfactory market figure																		
2030/31	1.46:1		Assumption of no																		

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						<table><tr><td></td><td></td><td></td><td>increase in student numbers and development pipeline schemes are completed</td></tr><tr><td></td><td>1.65:1</td><td></td><td>As above but no development pipeline schemes are completed</td></tr></table>							increase in student numbers and development pipeline schemes are completed		1.65:1		As above but no development pipeline schemes are completed		either an in-room bathroom and shared kitchen or studios with an in-room kitchen and bathroom. H10.8: We do not believe that the proposed policy meets the scale of the issue of oversupply and likely proposals for short-term serviced accommodation. Proposals for change of use of part of an existing PBSA scheme to another residential use must (a) demonstrate that there is a demand		
			increase in student numbers and development pipeline schemes are completed																		
	1.65:1		As above but no development pipeline schemes are completed																		
						These two scenarios for 2030/31 indicate that there will still be oversupply issues.															
						They, in addition, suggest that there are two sub-markets – Coventry City Centre / Coventry University															

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						and Warwick University. The data suggests that Warwick University is under-supplied with a local student to bed ratio in 2021/22 of 2.6:1 and forecasts for 2030/31 of between 2.5:1 and 2.01:1 depending on assumptions made. In the case of Coventry City Centre / Coventry University, the 2021/22 local student to bed ratio was only 1.2:1, while by 2030/31 the ratio range is forecasted to be between 1.1:1 and 1.5:1. Their conclusion is that there is scope for additional development at the University of Warwick but there will continue to be a surplus in the city centre. However, as Cushman & Wakefield point out elsewhere in their report, PBSA providers are providing incentives for Warwick University-based students to locate in the city centre, and there is evidence that students may favour the additional facilities and services in a central location (which was discussed during the University of Warwick SPD consultation in summer 2024).	for such a use, (b) the new residential use must be self-contained and segregated from the student accommodation Proposals for the conversion or redevelopment of difficult-to-let PBSA schemes to another residential use will be supported, but evidence must be submitted that there is a demand for the new residential use		

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						Therefore, we believe that caution is needed in assuming that there are two separate sub-markets. 3. <u>Our View</u> Our overall concern is the impact of an oversupply of PBSA. <u>Firstly</u>, oversupply is resulting in under-occupation of existing schemes leading to providers requesting a change of use to a more flexible approach serviced short-term accommodation. However, little or no evidence is supplied to show that there is a demand / need for such accommodation. Local plan policies should, therefore, require robust evidence to assess such requests. <u>Secondly</u>, given the scale of over-supply and the existing and future high vacancy rates on some existing PBSA schemes , the local plan should encourage their reuse / redevelopment for other residential uses subject to evidence that there is a demand / need. The draft local plan makes			

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						reference, for example, to build for rent and co-living (see policies H.12 and H.13). Furthermore, without such actions, a likely scenario is that some schemes will be mothballed and the physical fabric will deteriorate leading to a worsening of the townscape and built environment. An additional benefit of reuse/redevelopment is that this will encourage tenure diversification (especially in the city centre where residential accommodation is dominated by student housing). Diversification of tenure is a theme within the proposed housing policies in the local plan. <u>Thirdly</u>, we believe that the monitor and manage approach is inappropriate given the scale of over-supply³. A pro-active stance is required to tackle existing over-supply and prevent further PBSA units being developed unless there are exceptional reasons such as the replacement of poorly designed and low quality accommodation with better quality provision. We also therefore recommend the			

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						deletion in appendix 8 of the monitoring statement for policy H.10. <u>Fourthly</u>, in relation to the Warwick University 'sub-market, we have already expressed our concern over the use of this term. We, nevertheless, acknowledge that the University has a robust plan for growth as evidenced by our involvement as a consultee in the University of Warwick SPD during 2024. However, we believe that some existing and possible future PBSA schemes (which are referred to in the SPD as on the 'collar of the campus' but with unfortunately no definition of this term) are inappropriate e.g. • Conversion and / or redevelopment of sites on Westwood Business Park when the Local Plan highlights the shortage of land for business and industrial uses⁴ • Schemes on and around the A45 Fletchamstead Highway (such as Burnsall Road) which are poorly located for the University of Warwick.			

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						We also are sceptical whether there are other suitable sites on the 'collar of the campus' that might become available without impacting negatively on existing uses such as residential neighbourhoods. Furthermore, the University of Warwick SPD section on residential accommodation states that there are a "number of locations within the SPD boundary where student residences could be considered". We suggest that this presents an opportunity for the University to collaborate with PBSA developers on potential schemes. An example of this would be the redevelopment at higher density of residential accommodation on the Westwood Campus part of the University of Warwick site.			
Watkin Jones Group (ID72)	H10			N	Y	The Policy does not make a clear and justified case for the locational based approach to student accommodation. We believe that the locational area is too tightly drawn ("immediately adjacent") which is not clearly supported by evidence. The Proposals Map should have clear reference to what is meant	Exceptional circumstances" (1) is not required and is too high test based upon the evidence available.	The combination of the exceptional circumstances test and preferred locational approach is considered appropriate given the evidence is clear	Points 3 and 4 could be reworded to make them better comply with NPPF

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						by “campus”, or ideally a wider alternative area based upon reasonable journey times to campus. The reader should not be left to refer to other policy documents (<i>“the areas are as per the adopted Warwick University SPD, and the University and Enterprise Area of the City Centre, or future adopted university masterplan Supplementary Planning Document.”</i> – see para 6.47). Further, “Exceptional circumstances” (1) is not required, and is too high test based upon the evidence available. It should be adjusted to a “preferred location”. It is not clear what need evidence is required as part of (2a), and therefore more guidance is required for the policy to be effective. The Plan does not set out what the two universities are demonstrating in terms of need (2b). The Key Report states (p13) “The City Council should engage the City’s universities in a more active role in the planning process” which we would assume means plan-making, not that applicants need to engage during development management. Section 5 of this evidence does not suggest that the universities	It should be adjusted to a “preferred location”. It is not clear what need evidence is required as part of (2a), and therefore more guidance is required for the policy to be effective. Sub-policy (4) is not clearly written (therefore not effective) and should be rewritten to reflect the Council’s evidence base anticipated for the plan period at the time of writing the Local	and robust about the over provision of PBSA in Coventry and shows the city would still be at saturation point even if none of the current development pipeline schemes were completed. A strong policy response is therefore justified. The evidence needed in part 2a is based on the monitor and manage approach, to be published regularly by the Council. Including part 2b is considered appropriate as it is included as an “or” to part 2a and it ensures positive consideration is given when a university	effective requirement.

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						support the locational based policy. Such a policy would essentially prevent direct-let PBSA from coming forward. In WJG experience, it is unlikely that a formal agreement with a university would be received to evidence a need for more student accommodation, and in many cities, universities have naturally been reluctant to formally support applications for PBSA to protect their own interests/assets. No evidence to suggest that there is no need for PBSA so why should design flexibility (reconfiguration) be required – not for any other use in the plan (3). This is an unnecessary waste of an applicants' time and resources and is not justified. The policy should be more focused with ensuring that the proposed PBSA is a high quality product to ensure that it does not suffer from market failure. If the student accommodation market becomes more challenged over the plan period, then it is far more likely that older properties will suffer.	Plan. We suggest a statement along the lines of "Proposals should comprise predominantly cluster bedrooms. Where studios dominate the overall mix, then evidence of need for the studios should be provided." It is equally not clear what is expected from (6) and should therefore be further justified for it to be effective and ultimately to be found sound.	supports a PBSA development, such as an innovate product to support their growth. The requirement in point 3 for flexibility in design and in point 6, which 'encourages' design innovation and high quality affordable products, are considered reasonable because the evidence shows Coventry has such a significant surplus of PBSA that the market cannot absorb and given the consistent need for affordable accommodation. Therefore, future safeguards are required to ensure new	

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						Sub-policy (4) is not clearly written (therefore not effective) and should be rewritten to reflect the Council's evidence base anticipated for the plan period at the time of writing the Local Plan. We suggest a statement along the lines of "Proposals should comprise predominantly cluster bedrooms. Where studios dominate the overall mix, then evidence of need for the studios should be provided." It is equally not clear what is expected from (6) and should therefore be further justified for it to be effective and ultimately to be found sound.		accommodation can be easily adaptable to meet general housing standards. Coventry University campus area is shown in Appendix 9f, but Warwick University campus is referred to as the Warwick University Campus Masterplan SPD as it straddles two Local Authority areas.	
Turley on behalf of the University of Warwick (ID68)	H10	Y	Y	N	Y	The adopted SPD for the University of Warwick states that the University currently provides accommodation for c7500 students on campus (as of February 2024). The University's aspiration is to continue to investigate the increase of its stock of student accommodation and renew existing accommodation, with a view to ensuring that at least the current ratio of on/ immediately adjacent to campus accommodation to students is maintained. The number of students attending the	The University consider that Policy H10 needs to be amended to make it a sound policy. As currently drafted it is unclear whether parts 3 onwards relate to on campus student	The policy has been written to accord with the evidence base. It is agreed a definition could be added to define 'immediately adjacent' to clarify this means sharing a common boundary. It is also agreed that support does not need to be in the form of a	Modification to define 'immediately adjacent', clarification on nomination agreements, more flexible wording on the types of

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						University is expected to grow by the year 2033. The University's aspiration is to increase the number of student bed spaces serving the University by c1200 by 2033, either within or immediately adjoining the campus. In the previous round of consultation on the Local Plan, the University made recommendations on the proposed amendments to Policy H10, noting support for a policy which requires new student accommodation to be within and within easy reach of, the campus, but suggesting that the defined '15 minute walk' as proposed, was removed. It is encouraging that paragraph 6.47 states that for the purposes of 'campuses' within Policy H10, for the University of Warwick, this is the area as defined in the adopted University of Warwick SPD. It is also welcomed that the reference to '15 minute walk' has been removed.	accommodation development as well as 'other' locations. It is suggested that Policy H10 be amended as follows (additional text in red): Policy H10: Student Accommodation 1. PBSA development must be located within or immediately adjacent to the University of Warwick Campus or Coventry University Campus, unless exceptional	nomination agreement. In terms of the adaptability to other uses point it is not understood why this cannot apply to all forms of PBSA regardless of where it is located as this is considered a more sustainable approach. In terms of point 3 on exemptions for the University of Warwick campus, the Council does not feel it appropriate to treat one university differently to another. The policy on studio ratios (point 4) and the predominance of cluster flats (point 5) was developed in accordance with the evidence base but the comments are noted in	accommodation so that it reflects the needs of the universities, and amendment to point 6 to clarify good design relates to all products.

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						However, the University consider that the policy as currently drafted is not fully clear and should be amended at a number of points. Part 1 of the Policy states that “PBSA development must be located within or immediately adjacent to the University of Warwick Campus or Coventry University Campus, unless exceptional circumstances demonstrate otherwise”. There is no definition of what ‘immediately adjacent to the campus’ means and the University consider that this needs to be defined. Part 2 a and b of the policy relates to proposals outside of the locations identified in part 1 (within or immediately adjacent to campus). However, it is not clear as to whether parts 3,4 and 5 relate to all PBSA proposals whether within/immediately adjacent to campus or in other locations. If it is intended that these parts of the policy relate to all proposals, then the University	circumstances demonstrate otherwise. [Footnote/text definition/glossary to be added to define what is meant by ‘immediately adjacent’] 2. Purpose Built Student Accommodation (PBSA), proposed outside of the areas identified in point 1, whether new build or conversions, will be delivered in line with the Council’s PBSA monitor and	terms of the level of policy intervention in the market and a modification could be considered in this regard. The policy on no more than 8 units per cluster has been included to avoid overcrowding and encourage design, and linked to the point on good design the Council considers an amendment to policy H10 point 6 would be expedient as currently this specifies ‘high quality affordable products’ whereas this should relate to all products.	

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						consider these requirements to be inappropriate for proposals within the campus. Any student accommodation built within the campus should not be required to demonstrate its adaptability to general housing. The campus location means that the only use of student accommodation would be as student accommodation. Provision of general housing within the campus would not be supported or considered appropriate by the University. Parts 4 and 5 of the policy refer to the type of accommodation proposed, requiring that proposals for studio accommodation be assessed against evidence and requiring that proposals must comprise predominantly cluster units. The University is supportive of a range of types of accommodation being provided. However, it is considered inappropriate for parts 4 and 5 of the Policy to be applied to new student accommodation within the campus, provided by the University. The	manage approach and will only be considered appropriate where: a) The PBSA monitor and manage approach demonstrates evidence of need for additional student accommodation; or b) There is support from one of the City's universities that evidences a need for additional student accommodation [Footnote to be added to confirm		

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						University monitor and manage its own accommodation and know what type of accommodation is required and desired by students at a particular time. This includes cluster flats of more than 8 units. Therefore the University should not be restricted by part 5 of the policy which limits cluster units to no more than 8 per cluster. Part 2a of the Policy refers to PBSA proposals in locations not within or adjacent to the campus, will only be considered appropriate if the monitor and manage approach demonstrates need for additional accommodation and there is support from one of the city's universities that evidences such a need. It is unclear whether part 2b is essentially requiring a 'Nomination Agreement' to be in place with one of the Universities to demonstrate this 'support'. The University of Warwick does not currently enter in Nomination Agreements with private PBSA providers prior to developments being built, so would raise concern if this is the intention of this part of the Policy. Clarification on this point is requested.	such support does not need to be a Nomination Agreement]. 3. Proposals (other than those within the University of Warwick Campus) must provide evidence to show adaptability to other uses by being designed in such a way that it can be capable of being re-configured through internal alterations to meet NDSS standards to meet general housing needs in the future.		

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							4. Developments (other than those within the University of Warwick campus) that comprise a predominant studio ratio will be considered in line with the most up to date available evidence. 5. Proposals (other than those with the University of Warwick campus) should comprise predominantly cluster units of no more than 8 units per cluster.		

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							6. Design innovation will be encouraged within the sector, particularly in high quality affordable products, in line with the design standards set out in the Residential Design Guide SPD. 7. To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement. 8. Where a change of use is proposed		

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							to part of an existing student accommodation block to another residential use, the residential use must be self-contained and segmented from the student accommodation		
Tyler Parkes on behalf of PCCWM (ID69)	H10	Y	Y	N	Y	In relation to Policy H10, the PCCWM made the following representation to the Regulation 18 consultation: “The PCCWM supports the rewording of Policy H10: Student Accommodation to ensure that for HMO proposed conversions, these will be assessed in line with the HMO DPD (upon which the PCCWM has made representations and wishes to appear at the forthcoming Examination). However, the PCCWM considers that specific reference should be made in Policy H7 to the need to considers that there should be clear standards	The PCCWM considers that the policy should make reference to consultation with Design Out Crime Officers (DOCO) at the pre-application and planning application stage, the need for all proposals to meet	Wording to be added into the supporting text of policy DE1 to require housing developments to consider how they would meet the relevant ‘Secured By Design’ principles (similar to point h of Policy HMO4 of the Council’s HMO DPD). This is considered to be the most appropriate place as the	Wording could be added into the supporting text of policy DE1 to require housing developments to consider how they would meet the relevant ‘Secured By

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						against which such applications are considered. These standards should include adequate provisions to design out crime. The policy should make reference to consultation with Design Out Crime Officers (DOCO) at the pre-application and planning application stage, the need for all proposals to meet Secured by Design principles and the need for a management plan to ensure crime prevention measures are maintained.” The Consultation Statement does not acknowledge this representation, nor is it reflected in the policy itself. However, whilst the PCCWM favours the principle of a policy which supports Student Accommodation, nevertheless he considers that further consideration should be given to his recommendations in the interests of reducing crime and the fear of crime accordingly, as set out in the justification in the representation of the PCCWM regarding Policy H13.	Secured by Design principles and the need for a management plan to ensure crime prevention measures are maintained. Policy H10 should therefore be amended by the inclusion of a clause such as: 'All proposals will be expected to demonstrate how the relevant 'Secured by Design' principles have been met including the outcome of consultation with Design Out Crime	plan is to be read as a whole.	Design' principles (similar to point h of Policy HMO4 of the Council's HMO DPD).

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							Officers (DOCO) at the pre-application stage and preparation of a management plan to demonstrate how the crime prevention measures will be maintained.		
Home Builders Federation (ID21)	H10	N	N	N	Y	Policy H10: Student Accommodation <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 92. If the Council wish to provide additional advice on the interpretation of any policy, this should be done through a Supplementary Planning Document, which is prepared and consulted on after the Local Plan policy has been adopted. It cannot be	Please refer to representation	The reference to standards in existing SPDs is considered reasonable and a common approach.	No change

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						done through trying to give Local Plan policies status to an existing SPD, as suggested by Criterion 6, especially as the existing SPD hangs from the adopted policies in the Local Plan, which will be replaced when this new Local Plan is adopted. Supplementary Planning Documents should by definition be supplementary to the Local Plan.			
KOGG/Merle Gering (ID32)	H10	N		N	Y	Policy H10 is supported where it can be shown there is genuine demand for PBSA. Recently, owners have applied for permission to rent to non students because demand has been very weak.		Comments are noted.	No change
Stride Treglown on behalf of Coventry University	H10: 6.4 3-6.4 7	Y	Y	Y	Y	In relation to accommodating the growth ambition of the University Group, the policy framework relating to student accommodation is likely to change. Since the substantive drafting of the Draft Local Plan prior to its Adoption in December 2017, the number of Purpose-Built Student Accommodation (PBSA) study bedrooms in and around the City Centre has been significant. The University Group acknowledges that the importance	The University Group therefore supports a more nuanced approach which allows university controlled student and staff accommodation to	The Council would welcome further collaboration with the university and on its accommodation intentions. PBSA on campus and that which is supported by the universities in any location	Definition of “immediately adjacent” to be added into the supporting text or the glossary.

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(ID61)						of catering for young people and professionals (including graduate recruitment) is referenced in paras 3.1, 6.27, 6.55 and 6.59 of the Reg 19 Local Plan. The University Group will be pleased to share its current views on student accommodation distribution and delivery within the City, and to work with the Council to investigate opportunities for new forms and models of accommodation to come forward which address the needs of its students and staff. New business models could include Co-living and Build to Rent accommodation managed by the University Group. These would not specifically be models available to non-university stakeholders and therefore not related to general housing growth but meeting a changing need in a particular and defined housing group (in this case, Students and visiting University Group staff). The University Group therefore encourages the City Council to adopt the same principles to PBSA controlled under new occupational models – such as	be considered on its merits and where there is a clear demonstrable need at the time of any formal planning application: the University Group is unlikely to continue to compete in a competitive private sector dominated PBSA market when it is seeking to deliver bespoke solutions to its students and staff. This representation is made in the interests	is strongly supported in the policy and should give the university comfort that it's growth on campus will be supported by the council. Regarding the flexibility the university is seeking in its student and staff accommodation, Policy H10 relates to student accommodation only. If the university was to apply for another form of residential accommodation, this would be assessed on its own merits and against all relevant local plan policies within the planning balance. The responses to Policies H12 and H13 address the	

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						Co-living and Build to Rent, where the accommodation is controlled and managed by the University Group. The University Group therefore supports a more nuanced approach which allows university controlled student and staff accommodation to be considered on its merits and where there is a clear demonstrable need at the time of any formal planning application: the University Group is unlikely to continue to compete in a competitive private sector dominated PBSA market when it is seeking to deliver bespoke solutions to its students and staff. However, the University Group needs to be agile and flexible in its approach over a long time frame, such as the lifetime of the Local Plan, as a response to future market forces or other external factors may be required. The reference to “directly accessible” requires clarification. In this regard, consideration should be given to a defined University Campus Masterplan area (see suggested Policy CC2). This would also	supporting a positive, justified, effective and responsive plan. In this instance, the representation targets greater flexibility in relation to Build to Rent and Co-Living rather under Policies H12 and H13. The representation supports ongoing discussions between the University Group and Council to better inform the evolution of Local Plan policy in relation to student	university’s comments on co-living and build to rent accommodation for staff managed by the university. The policies ensuring co-living and BtR are assessed in a consistent manner across the city, regardless of the provider, in the interest of potential occupiers and to meet the identified need in the city. Applications to change planning permissions / building uses whether in full or in part to provide dual occupancy / flexibility of buildings, is not objected to in principle subject to the appropriate safeguards that allows both uses to comply with the aims of	

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						enable the University Group to develop its masterplan ambitions within such a defined area which would align with the initiatives generated by the Adopted Estate Strategy: the Masterplan being developed in collaboration with the City Council as referenced in para 8.15 and Policy CO1 (pp83 – 84). The University Group understands that the City Council commissioned a PBSA Study in 2024 and that Policy H10 draws upon the findings of the same. In this context, the University Group remains committed to ensure that all students are provided with the highest quality PBSA within the City. The potential for growth and development of PBSA will be monitored and the University Group will maintain dialogue with CCC as the needs develop. In line with responses presented elsewhere within this representation, the University Group would be keen to explore opportunities with the Council to inform a Council controlled monitor and manage approach to PBSA (including new models of university managed accommodation such as Co-	needs and management regimes across the City.	the Local Plan, set out in Part 8 of the policy. Coventry University campus area is shown in Appendix 9f, but Warwick University campus is referred to the Warwick University Campus Masterplan SPD as it straddles two Local Authority areas.	

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						living or Built to Rent). This will enable the Council to recognise the University Group's growth plans and ambitions whilst ensuring that this does not undermine the Council's strategy to achieve a balanced housing market. The University Group is prepared to share information relating to student accommodation surveys and management arrangements run by FutureLets, the commercial arm of the University Group responsible for its controlled accommodation. The analysis undertaken by the University Group will help evidence ongoing demand for university-controlled accommodation and the reasons why students might seek private sector accommodation in the City: including preferences and bespoke needs associated with short-term duration leases. The ANUK Code and UUK Code of Practice provide clear guidelines on the safe and effective management of buildings, which could be considered by the council as many of these points support the delivery of inclusive, and safe			

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						communities. It is important that buildings are effectively managed with 24/7 support for students to ensure that buildings are safe and students have a point of contact throughout the day. Shared spaces to study, relax and spend time away from a flat or studio and access to outside space are equally important in buildings to support these communities and it is expected that amenities such as laundry are included in the design as standard, with many PBSA accommodation buildings also providing gyms, and workout spaces. There has been an increase of students with dependants requiring accommodation which is not met through PBSA accommodation. Consideration of the effect of partially occupied buildings in the city should form part of the evidence base to inform policy. The University Group considers that it is better to have full vibrant buildings with a strong sense of community and a positive environment or dual occupancy buildings where there are both young professionals and students occupying. How this impacts each group and their requirements on			

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						the space and use of the building, particularly in relation to the shared community spaces can be both a design and management challenge. Warwick and Coventry students currently both occupy spaces in the city. With a policy emphasis towards 'located next to the edge of campus' this could impact on scheme viability and occupancy levels. Affordability is key to many students and the University Group is now starting to see a drop in prices and increase in offers to students to secure accommodation which makes PBSA accommodation more affordable. However, this does need to be balanced with the quality of the accommodation and how the buildings are managed and students supported. Reasonable adjustments and the mix of accommodation needs will always be considered in any PBSA scheme, or other approach to support the needs of the emerging and changing Student population supported by the University Group. It is important that the needs of graduates / young			

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						professionals wishing to remain in the City after attending university are supported by appropriate and flexible accommodation models. This is a One Coventry Objective. There also needs to be greater collaboration between the Council and public transport operators to support accessibility provision to PBSA schemes. The Council has often collected developer contributions arising from PBSA and there needs to be greater transparency of scheme delivery to improve active travel connectivity to these sites.			
Stride Treglown on behalf of Coventry University (ID61)	6.47	Y	Y	Y	Y	In order to accurately cross-reference the suggested new Policy CC2 as advocated by the University Group, para 6.44 should refer to the introduction of a Policy CC2 and the associated defined boundary of the University Group Campus. The extent of the University Group's landholding extends beyond the University and Enterprise character area of the City Centre.	In order to accurately cross-reference the suggested new Policy CC2 as advocated by the University Group, para 6.44 should refer to the introduction of a Policy CC2 and the	An additional policy CC2 is not considered necessary as the university is already developing a masterplan and the local plan provides the hook to this. The council welcomes further collaboration with the university.	No change

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							associated defined boundary of the University Group Campus. The extent of the University Group's landholding extends beyond the University and Enterprise character area of the City Centre.		

H11 - Homes in Multiple Occupation (HMOs)

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Tyler Parkes on behalf of PCCWM (ID69)	H11	Y	Y	N	Y	It is noted that this policy has been retained to provide a policy link to the HMO DPD, although Policy H3 has not been updated to ensure that the Local Plan and the HMO DPD are appropriately cross referenced. Representations were made on behalf of the PCCWM through the Examination process on the HMO DPD. This led to some changes to the approach which should be incorporated into the final adopted version. According to the latest LDS, the HMO DPD is due to be adopted in Q1 of 2025. Subject to this taking place, the following policy in the consultation draft would be broadly acceptable: “Homes in Multiple Occupation 6.48 The Council has a separate Homes in Multiple Occupation (HMO) Development Plan Document and applications for HMOs must be considered in accordance with this. Policy H11: Homes in Multiple Occupation (HMOs) All applications for Homes in Multiple Occupation (HMOs) will be determined in accordance with the Council’s Homes in Multiple	Policy H11 should be applied to ALL HMO applications.	The comments seem to have confused the Article 4 Direction with the HMO DPD. The HMO DPD relates to all new HMOs when planning permission is required regardless of where they are in the city. The A4 only relates to designated wards of the city and requires planning permission for all HMO proposals whether large or small.	No change

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						Occupation Development Plan Document alongside other policies in the adopted Local Plan.” Notwithstanding, the DPD Examination was not able to consider one of the PCCWM’s comments which was that the control over HMOs should apply across the whole city, not just part of the city as shown below. This could not be considered through the HMO DPD Public Examination process as the accompanying Article 4 Direction was consulted upon and established separately and in advance of the hearing sessions of the HMO Public Examination (held in January 2024). As drafted, Policy H11 reads as if ALL HMO planning applications will be determined in accordance with the policy when this is not the position as swathes of the city are not subject to the policy. The policy approach towards HMO’s set out in the DPD is not the issue, it is the fact that it is only implemented in part of the city. The new local plan should be clear that Policy H11 should be applied to ALL HMO applications city-wide and until the Article 4 Direction is changed accordingly, Policy H11 is unsound on this basis. Unless this happens, it is likely that the issues associated with concentrations of HMOs will spread into the other parts of the city. Indeed, a district-wide approach is an increasingly typical approach taken in other authority areas.			

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Joscely ne Bigha m (ID23)	H1 1 and para 6.4 8	N	N	N	N	Longford Ward should be included within the HMO Article 4 designated area. Located in Coventry Northeast, it experiences similar issues to Foleshill. It appears as if properties are being converted with the intention of changing the use to small HMO (3-6 people, C4) later on. There also seems to have been an increase in planning applications for side extensions, etc. The removal of family homes and an increase in short term lets is having an impact on social cohesion and increasing levels of transience. HMOs are unsuitable accommodation for young families. Locally, HMOs appear to be associated with an increase in levels of fly tipping, demand for on-street parking, etc.	Look at including Longford Ward within the HMO Article 4 designated area.	The Local Plan review is not considering changes to the Article 4 Direction, which is imposed on those wards evidenced to have the highest concentration of HMOs.	No change

H12 - Build to Rent

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Home Builders Federation (ID21)	H12	N	N	N	Y	Policy H12 – Build to Rent <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 93. HBF have provided in detailed comments on NDSS in our response to Strategic Policy H3: Provision of New Housing. They are not repeated here. Please see representation in Policy H3	Please refer to representation	Please refer to response in H3.	No change
Stride Treglown on behalf of Coventry	6.49-6.73	Y	Y	N	Y	As referenced elsewhere in the University's representation to the Reg 19 Submission Plan, the University Group is developing its long-term strategy for student accommodation. The growth in private sector PBSA delivery in recent years has influenced the direction of travel and the University Group is considering new models which offer a differentiated	The University Group is therefore requesting that the City Council looks to a more flexible	The council supports further collaboration with the University. The requirements / standards listed in the policy are appropriate and are justified	No change

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university (ID61)						approach to meeting the needs of both domestic and international students and staff. Options for future delivery of university-controlled accommodation are likely to be focused on non-traditional models, including co-living and Build to Rent alternatives. A University Group co-living or Build to Rent model will not be managed within the standard “open market” parameters of three or more years tenancies, but on one or more academic semesters or on a short-term basis for visiting students or staff. As such, the University Group objects to the current drafting of Policy H12 1e. Greater flexibility should be accommodated within the provisions of the policy: the University’s objection will be withdrawn if the words “Unless controlled by Coventry University Group,” are inserted at the start of sub-section e. The details of such a bespoke University Build to Rent model are yet to be determined or finalised, however flexibility is the key to enable the University Group to meet the bespoke needs of individuals under their pastoral care. As such, the University Group would	arrangement, where such accommodation is available and part of the transient student needs during their studies, and where visiting staff/lecturers can take advantage of short-term University Group controlled accommodation where pastoral care is provided by their employer: as a permanent,	through the evidence base. They are for the protection of tenants’ amenity and to ensure proposals meet the long term identified need and would not simply become short term / hotel type accommodation. Build to rent is a specific housing model and responds to a specific need in the market. The council needs to ensure a consistent approach is taken when assessing BtR, therefore including wording “unless controlled by Coventry University Group” would be inappropriate. Any type of residential application submitted by the university would be considered on its own merits against relevant local plan policies.	

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						wish to engage with the Council to discuss future options linked to bespoke accommodation needs in a way which can continue to be controlled by the University Group and in a manner where such accommodation does not form part of the traditional housing delivery targets set by Government. Whereas the Reg 18 Issues and Options Consultation Draft Local Plan referenced the opportunities for Co-Living and Build to Rent being part of the solution which retains graduates in the City and delivers homes for the younger generation, this has been omitted in the Reg 19 text. The University Group objects to the current drafting and requests that this is re-inserted into the supporting text of Policy H12 and H13. The University Group is therefore requesting that the City Council looks to a more flexible arrangement, where such accommodation is available and part of the transient student needs during their studies, and where visiting staff/lecturers can take advantage of short-term University Group controlled accommodation where pastoral care is provided by their employer: as a permanent, responsible	responsible organisation which has a long-term duty of care over its student (and staff) within controlled accommodation , management safeguards are in place to ensure appropriate living standards and pastoral care is available. This representation is in the interests of supporting a	Coventry's low graduate retention rate is mentioned in the housing background paper, and the HEDNA (informed by the Centre for Cities report). The reference to Coventry University may be an error in place of referring to Coventry as a whole.	

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						organisation which has a long-term duty of care over its student (and staff) within controlled accommodation, management safeguards are in place to ensure appropriate living standards and pastoral care is available. The University Group would welcome a conversation with the City Council to discuss and receive clarification on how the council reached the conclusion that the University Group (Coventry University) has a low graduate retention rate in the city. Discussions on this topic extend wider than the consultation on the Local Plan and as such separate engagement on this topic would be helpful. The University Group is keen to explore opportunities for bespoke Co-Living or bespoke Build to Rent schemes specifically for the needs of university students (and staff). The repurposing and/or redevelopment of one or more sites within the University Group estate may be explored during the drafting of the Local Plan and ongoing engagement with the Council is supported in this context.	positive, justified, effective and responsive plan. The suggested approach offers a tailored policy solution to address socio-demographic pressures and the opportunities to meet specialist housing needs through university controlled new housing models. To seek ongoing collaboration with the Council to share best		

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						Redevelopment of a University Group controlled site could likely result in relocations of academic or R&D uses elsewhere within the estate. The University Group acknowledges that the Local Plan states (para 6.70) that student accommodation is the most comparable residential model to co-living: it is for this reason that the University Group are keen to explore co-living models to meet specialist student, staff and researcher requirements over the life of the Local Plan as an alternative to traditional private sector PBSA schemes across the City Centre. The reference to a minimum of three month tenancies would broadly equate to a university semester, and therefore provides a sound basis for occupation.	practice while potentially benefitting from empirical research undertaken locally by the University Group.		

H13 – Co-living

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Watkins Jones Group (ID72)	H13			N	Y	Watkin Jones is actively pursuing co-living schemes in core cities across the UK, noting that Co-Living has played an important role in attracting and retaining talent and supporting economic development. Whilst co-living development can significantly contribute to flexible and affordable housing stock, co-living is considered to constitute a Sui Generis use and thus on-site affordable housing policy requirements are not typically considered applicable to such schemes. The Policy should make an allowance for the consideration of development viability in each instance, including a financial payment in lieu option. We note that the evidence base recommended “targeting a rate of 25% affordable housing (as in the draft policy). We would recommend that this is maintained at a higher rate than for build-to rent in order to encourage the delivery of larger unit types in this sector”. This suggests that this is a negatively prepared policy choice that seeks to penalise less preferred tenures of		The approach to co-living and affordable housing is considered robust and proportionate having been tested as part of the viability assessment. Part 11 of policy H6 allows for flexibility if schemes are not viable for affordable housing. The requirement for NDSS, unit sizes and amenity space sizes are informed by the HEDNA and other comparable local authority policies and are included to ensure high quality accommodation is provided that protects tenants’ amenity.	Modification to include missing text at 1.g as set out in CCC response column

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						accommodation which equally contribute towards the Council's housing need. It is clear that a lower level of affordable housing could be expected, and thereby justified in co-living proposals. In respect of sub-policy (1)(a) space standards / minimum unit sizes, each co-living scheme should be considered on its own merits in terms of space standards as this varies depending upon the scheme's scale and the specific nature of locations. This greater level of flexibility would facilitate a wider range of residential accommodation to be delivered within the City to support additional choice both in the type of offer, and the cost of accommodation. We do not believe that there should be minimum unit sizes as this unnecessarily restricts the market through delivering innovative design across a scheme, and the ability to offer more affordable price points. If the Council requires minimum unit size, we believe the figure should start at 18 sqm based upon schemes already operating successfully in the UK. Further, the whole premise of co-living is based on smaller units in		The policy's requirement for a concierge or onsite personnel is considered reasonable and proportionate and in line with the recommendations in the HEDNA and other local authority policies. Both London's and Birmingham's co-living policies consider a concierge or onsite personnel to be an essential part of Co-living schemes. The Council notes, however that in Point 1(g) some text is missing. This should say: i) Direct access to a communal kitchen that does not require any residents to travel between different floors and which has adequate facilities for a	

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						return for higher levels of shared space and better service/ affordability. Therefore, setting a higher bracket for room sizes will either prevent development from being viable, or lead to decreased affordability for local residents. In terms of shared amenity, this should be at a minimum of 3 sqm per bedroom for the policy to be effective (Policy H13(1)(f) relates). Based upon limited experience the Council offer no justification for the approach. We do not believe that the kitchen standards (Policy H13(1)(h) relates) are necessary or justified, as this minimum standard will again affect affordability, and we do not support the statement that kitchens should not be shared by more than 8 private bedrooms. Equally, we do not support the statement that shared kitchens should not be on different floors from private bedrooms. Co-living schemes advocate much more centralised kitchens within a building to promote the wider 'community' aspect and provide better quality cook stations in a larger setting. The areas quoted mean that cooking and eating are all done locally and do not allow for a more social centralised environment, which is the main point/advantage of the co-living product.		maximum of 8 bedrooms and adequate space for residents to store food and cooking and eating utensils and to prepare meals at times of relatively high demand; ii. Outside communal amenity space (roof terrace and/or garden); iii. internal communal amenity space (dining rooms, lounges, workspace); and iv. laundry and drying facilities	

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						Many schemes therefore cater for far more than 8 bedrooms to build community and we strongly suggest that this upper limit is omitted as there is no evidence to suggest that residential amenity is harmed by larger kitchens – indeed the reverse is true. The concept is quite different to a PBSA cluster approach. Finally, not all co-living schemes will provide concierge or on-site personnel (Policy H13(1)(d) relates), and there is not evidence provided that justifies this in all co-living schemes. It is notable that this is not a requirement for PBSA (or Build to Rent) which is often the Council's reference point for co-living. Again this adds additional costs to residents that is unnecessary.			
Tyler Parkes on behalf of PCCWM (ID69)	H13	Y	Y	N	Y	In relation to Policy H13, the PCCWM made the following representation to the Regulation 18 consultation: "The PCCWM supports the principle of a Policy which supports Co-Living in Coventry and considers that there should be clear standards against which such applications are considered. These standards should include adequate provisions to design out crime.	The policy should make reference to consultation with Design Out Crime Officers (DOCO) at the pre-	Crime prevention is considered in point 1j of the policy, which requires a management plan to be submitted with any application and point G of supporting paragraph 6.71 states 'crime prevention and anti-social behaviour measures'	Wording to be added into the supporting text of policy DE1 to require housing developments to consider how they

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						The policy should make reference to consultation with Design Out Crime Officers (DOCO) at the pre-application and planning application stage, the need for all proposals to meet Secured by Design principles and the need for a management plan to ensure crime prevention measures are maintained.” The justification for this is set out in the response of the PCCWM to Question 34 of the Issues and Options Consultation and applies equally to policies H7 and H10 and is repeated here for consistency, particularly as the Consultation Statement does not acknowledge this representation either: “... Secured by Design (SBD) and Designing Out Crime (DOC) are the most sustainable and therefore the most cost-effective of all crime reduction interventions, with little or no evidence of displacement of crime and far more likely to lead to benefits to surrounding areas. Over the past two decades, independent, academic assessments have demonstrated that developments which attain the Secured by Design (SBD) award maintain long term, sustainable reductions in recorded crime. The flagship project, ‘The Four Towers’ at Duddeston Manor in nearby Birmingham has	application and planning application stage, the need for all proposals to meet Secured by Design principles and the need for a management plan to ensure crime prevention measures are maintained. Policy H13 should therefore be amended by the inclusion of a clause such as:	are to be included in the management plan. As the plan is to be read as a whole, wording could be added into the supporting text of policy DE1 to require housing developments to consider how they would meet the relevant ‘Secured By Design’ principles.	would meet the relevant ‘Secured By Design’ principles (similar to point h of Policy HMO4 of the Council’s HMO DPD).

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						maintained a 98.7% reduction (as based on the figures for 1988) in domestic burglary for over 20 years, whilst reductions in other property crime categories replicate the research findings of others. Policies which support the need for development to be SBD would accord with the requirements of the NPPF. The 'broken windows theory' links disorder and incivility within a community to subsequent occurrences of serious crime. Any visible signs of crime and civil disorder, such as broken windows, vandalism, loitering, public drinking, and transportation fare evasion, can create an urban environment that promotes even more crime and disorder (Wilson & Kelling, 1982). The PCCWM has evidence that where there is a lack of maintenance, this can quickly lead to a spiral of decline/neglect if not addressed quickly and effectively. The PCCWM believes the need to design out crime and ensure its continued maintenance in all new developments and redevelopments is a cornerstone to successful sustainable communities including Co-living. (PBSA & HMOs)	'All proposals will be expected to demonstrate how the relevant 'Secured by Design' principles have been met including the outcome of consultation with Design Out Crime Officers (DOCO) at the pre-application stage and preparation of a management		

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						Examples of crime prevention initiatives of particular relevance to such developments include the need for: ☐ Adequate lighting for internal and external communal areas and access(es). ☐ Doors into internal private spaces to be of external access door standard to provide safe and secure areas for individuals in their homes reducing opportunities for theft, intimidation, violence, disorder and fear of crime. ☐ Controlled and regulated access into the properties, including into any separate buildings within the shared communal outdoor space to reduce the risk of unauthorised entry with associated opportunities for crime. Without such requirements, the PCCWM is concerned that Co-living, which the Issues and Options acknowledges is 'such a new model', may be an unsuccessful approach to providing housing that could help retain graduates in the City and deliver much needed homes for the younger generation, also to take the pressure off the number of HMOs coming forward. It is suggested that all Co-living proposals should be expected to demonstrate how the relevant 'Secured by Design' standards principles have been met including	plan to demonstrate how the crime prevention measures will be maintained.		

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						the outcome of consultation with Design Out Crime Officers (DOCO) at the pre-application stage and preparation of a management plan to demonstrate how the crime prevention measures will be maintained. Furthermore, it is considered that the specific Co-living policy should ensure that there is no over-concentration of Co-living units at the neighbourhood/street level, as affecting individual residents, to support a better balance and integration of Co-living occupancy within a residential area, reducing the potential for crime and disorder, and enhance community safety.” For these reasons, the PCCWM considers that further consideration should be given to his recommendations in the interests of reducing crime and the fear of crime accordingly and it is extremely disappointing that this has not been incorporated.			
Stride Treglown on behalf of	6.49-6.73	Y	Y	N	Y	As referenced elsewhere in the University’s representation to the Reg 19 Submission Plan, the University Group is developing its long-term strategy for student accommodation. The growth in private sector PBSA delivery in recent years has influenced the	The University Group is therefore requesting that the City	The council supports further collaboration with the University.	No change

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Covent ry Univer sity (ID61)						direction of travel and the University Group is considering new models which offer a differentiated approach to meeting the needs of both domestic and international students and staff. Options for future delivery of university-controlled accommodation are likely to be focused on non-traditional models, including co-living and Build to Rent alternatives. A University Group co-living or Build to Rent model will not be managed within the standard “open market” parameters of three or more years tenancies, but on one or more academic semesters or on a short-term basis for visiting students or staff. As such, the University Group objects to the current drafting of Policy H12 1e. Greater flexibility should be accommodated within the provisions of the policy: the University’s objection will be withdrawn if the words “Unless controlled by Coventry University Group,” are inserted at the start of sub-section e. The details of such a bespoke University Build to Rent model are yet to be determined or finalised, however flexibility is the key to enable the University Group to	Council looks to a more flexible arrangement, where such accommodation is available and part of the transient student needs during their studies, and where visiting staff/lecturers can take advantage of short-term University Group controlled accommodation where pastoral care	The requirements / standards listed in the policy are appropriate and are justified through the evidence base. They are for the protection of tenants’ amenity and to ensure proposals meet the long term identified need and would not simply become short term / hotel type accommodation. Co-living is a specific housing model and responds to a certain need in the market. The council needs to ensure a consistent approach is taken when assessing co-living, therefore including wording “unless controlled by Coventry University Group” would be inappropriate. Any type of residential application submitted by the university	

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						meet the bespoke needs of individuals under their pastoral care. As such, the University Group would wish to engage with the Council to discuss future options linked to bespoke accommodation needs in a way which can continue to be controlled by the University Group and in a manner where such accommodation does not form part of the traditional housing delivery targets set by Government. Whereas the Reg 18 Issues and Options Consultation Draft Local Plan referenced the opportunities for Co-Living and Build to Rent being part of the solution which retains graduates in the City and delivers homes for the younger generation, this has been omitted in the Reg 19 text. The University Group objects to the current drafting and requests that this is re-inserted into the supporting text of Policy H12 and H13. The University Group is therefore requesting that the City Council looks to a more flexible arrangement, where such accommodation is available and part of the transient student needs during their studies, and where visiting staff/lecturers can take advantage of short-term University Group controlled accommodation where	is provided by their employer: as a permanent, responsible organisation which has a long-term duty of care over its student (and staff) within controlled accommodation, management safeguards are in place to ensure appropriate living standards and pastoral care is available.	would be considered on it under its own merits against relevant local plan policies. Coventry's low graduate retention rate is mentioned in the housing background paper, and the HEDNA (informed by the Centre for Cities report). The reference to Coventry University may be an error in place of referring to Coventry as a whole.	

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						pastoral care is provided by their employer: as a permanent, responsible organisation which has a long-term duty of care over its student (and staff) within controlled accommodation, management safeguards are in place to ensure appropriate living standards and pastoral care is available. The University Group would welcome a conversation with the City Council to discuss and receive clarification on how the council reached the conclusion that the University Group (Coventry University) has a low graduate retention rate in the city. Discussions on this topic extend wider than the consultation on the Local Plan and as such separate engagement on this topic would be helpful. The University Group is keen to explore opportunities for bespoke Co-Living or bespoke Build to Rent schemes specifically for the needs of university students (and staff). The repurposing and/or redevelopment of one or more sites within the University Group estate may be explored during the drafting of the Local Plan and ongoing engagement with the Council is supported in	This representation is in the interests of supporting a positive, justified, effective and responsive plan. The suggested approach offers a tailored policy solution to address socio-demographic pressures and the opportunities to meet specialist		

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						this context. Redevelopment of a University Group controlled site could likely result in relocations of academic or R&D uses elsewhere within the estate. The University Group acknowledges that the Local Plan states (para 6.70) that student accommodation is the most comparable residential model to co-living: it is for this reason that the University Group are keen to explore co-living models to meet specialist student, staff and researcher requirements over the life of the Local Plan as an alternative to traditional private sector PBSA schemes across the City Centre. The reference to a minimum of three month tenancies would broadly equate to a university semester, and therefore provides a sound basis for occupation.	housing needs through university controlled new housing models. To seek ongoing collaboration with the Council to share best practice while potentially benefitting from empirical research undertaken locally by the University Group.		

Overarching comments (non-policy)

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Stephen McNaught (ID59)	Table 6.1		N	N	Y	Pease see Gerald Kells report. The total figure should be 35,693 and should be uplifted by 4,200 to accord with his conclusions on windfall and purpose built student accommodation.	Please see Gerald Kell's report. This says: Based on the qualitative and quantitative (historic trends) evidence the report considers a windfall allowance of 400 dpa fulfils the NPPF test of compelling evidence. This would add 2,800 dwellings to the supply over the Plan Period. The report also considers there is both qualitative and quantitative evidence of future PBSA windfalls and a reasonable allowance would be 200 dwelling equivalents per annum, adding a further 1,400 dwellings to the supply	The Gerald Kell's report uses the new SM in its calculations, however the Local Plan has been prepared and will be examined against the 2023 NPPF. The evidence base demonstrates the site selection and windfall strategy and PBSA provision	No change

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							over the Plan Period (i.e. houses released from being student accommodation.) Using the NSM, 27,760 dwellings would be required over the Plan Period. 31,493 dwellings are identified in the Plan but in my view that should be increased by 4,200 based on the evidence on Supply, making 35,693 dwellings. This leaves an excess supply of 7,933 dwellings.	to be robust and sound.	
KOGG/Merle Gering (ID32)	Table 6.1	N		N	Y	The windfall allowance in Table 6.1 should be adjusted to 5,600 and an additional line put in for windfall PBSA development amounting to 1,400. This would change the total to 35,263. 5.6 given the excess, allocations should be removed which fail other tests in the NPPF and Local Policy that would reduce the overall figure.	The windfall allowance in Table 6.1 should be adjusted to 5,600 and an additional line put in for windfall PBSA development amounting to 1,400. This would change the total to 35,263. 5.6 given the excess, allocations should be removed which fail other tests in the NPPF and Local Policy that	The evidence base shows the windfall site selection strategy is robust and sound.	No change

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							would reduce the overall figure.		
Savills on behalf of Bellway Homes and Merton College (ID52)	Housing Economic Land Availability Assessment (HELAA) (2024)	N	Y	N	Y	Housing Economic Land Availability Assessment (HELAA) (2024) 5.1. As Coventry will be aware, Land at Rookery Farm was submitted through the Call for Sites for a residential led, mixed use development of circa 1,200 dwellings. Located between the Coundon Wedge Country Park and the Coundon Hall Park and play area, the opportunity exists to connect and enhance the local green network. 5.2. There are no major constraints within the site. There are small areas of woodland within the site but there are no TPOs or other protected trees or hedgerows. There are a small number of listed buildings and features at Coundon Lodge and Alveston Cottage on the eastern boundary of the site.	Please refer to representation	The Council considers the findings of the Green Belt Technical Update Study, which demonstrates the Green Belt areas in the city continue to serve Green Belt purposes very well, is robust and no further Green Belt release is proposed. The limited green belt the city has is predominantly	No change

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						5.3. The site is in Flood Zone 1 and is therefore there at lowest risk of fluvial flooding. There are no Public Rights of Way within the site. 5.4. On this basis, the location of the site is continued to be considered appropriate for further strategic-scale, residential-led development, through forming a logical addition to Coventry. This location can provide access to the strategic and local road network, including public transport provision, such that the development would be well connected to Coventry City Centre, and the wider West Midlands. 5.5. An updated HELAA was published in November 2024. Land at Rookery Farm, Coventry was assessed under site reference BAB-011-24. As explained in the assessment, the site could have a capacity of 1,200 but in applying certain densities, between 1,530 – 1,785 dwellings.		Ancient Arden landscape. The evidence base shows the city can accommodate its housing supply within its boundary on brownfield land.	

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						5.6. Ultimately, the assessment of the site in the HELAA dismisses the site because the claim that the housing need can be delivered on brownfield sites, thus suggesting that the site can be considered to be unsuitable and not contribute to the housing land supply. Please refer to our concerns above under Policy DS1 around how Coventry proposed to meet its housing needs. 5.7. As explained within these Representations, Bellway and Merton College consider that the strategy applied by Coventry in the Local Plan Review to be unsound. This site remains to be readily available, and could substantially help meet Coventry's housing and potentially some of the unmet employment needs. 5.8. It is duly requested that Coventry reconsider the strategy to meet the needs of development, and reconsider this site. This site would make a significant and meaningful contribution to meeting			

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						Coventry's housing needs, and especially affordable housing needs – particularly in light of the significant failure of Coventry to meet the five year housing land supply requirements.			

Chapter 7 – Retail and Centres

Policy R2 - Coventry City Centre – Development Strategy

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Tyler Parkes on behalf of PCCWM (ID69)	R2	Y	Y	N	Y	The PCCWM notes the removal of Part 2 of Policy R2 given the City Centre Area Action Plan is adopted. However, he reiterates his representation to the Regulation 18 consultation that: “..it will be important to ensure that review of the AAP includes appropriate reference to the need to design out crime due to its specific importance within city centres and new developments. This should include the security of staff, the buildings and the sites themselves, which need to be taken into account from the outset of the design process. It is suggested for continuity that reference is added into Policy R2	Amend clause i. of Policy R2 to read as follows: i. Providing an attractive, safe and secure environment for pedestrians, cyclists and motorists, including integration of ‘Secured by Design’ and ‘Park Mark’ principles. (Suggested changes in bold and underlined). Introduce a specific evening economy policy.	CCC consider that Policy R2 is no longer required due to it being largely aligned with Policy CC1. Therefore, CCC propose to delete Policy R2. However,	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						to ensure that the Local Plan and the AAP are appropriately cross referenced.” The PCCWM notes that there are no plans to designate primary or secondary retail frontages outside the city centre for the reasons given in paragraph 7.15 of the consultation draft and that a separate policy to limit the concentration of sui generis uses dominating shopping frontages in appropriate centres is no longer proposed as set out in the Consultation Statement. The PCCWM objects and requires the strengthening of clause i. to read as follows: i. Providing an attractive, safe and secure environment for pedestrians, cyclists and motorists, including integration of ‘Secured by Design’ and ‘Park Mark’ principles. (Suggested changes in bold and underlined). Furthermore, it also noted that clause l. continues to refer to the importance of ‘Continuing to develop a vibrant and attractive nighttime economy.’ In this respect, the PCCWM		Policy DE1 contains multiple references to safety and security, legibility and accessibility. CCC also consider that the supporting text of Policy DE1 could be strengthened to include the following text at Para 10.6 this reflects the Government	

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						made the following representation to the Regulation 18 consultation: “The PCCWM acknowledges that there are benefits and disbenefits of a vibrant and mixed evening and night-time economy, confirming that this can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained, but it can also have negative impacts on local residents and the local environment needs to be carefully managed. The PCCWM considers it prudent to include a specific evening economy policy within the Coventry Local Plan as specific issues are not necessarily covered elsewhere in the Plan. In doing so, the aim is to reduce crime, the fear of crime, anti-social behaviour and potential disturbance to existing businesses and people. If crime, or the fear of crime is not addressed, people will not feel safe, are unlikely to use the entertainment/night-time facilities, with potential of an economic spiral of decline. Bars, restaurants and shops will close and be boarded		’s strategy for countering terrorism...I insert additional text here to read: Applicants are advised to contact Police Architectural Design Officers at the earliest possible stage.	

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						up, resulting in less people being attracted to the area, leading to the closure of more premises and companies going out of business. Such a policy would deliver economic, social and environmental sustainability.” The representation continued to detail the issues for a policy to consider. However, the Consultation Statement does not acknowledge this representation and there is no discussion on why no specific evening economy policy is proposed, particularly in the current absence of any policy in the consultation draft to reduce crime or the fear of crime. The PCCWM therefore continues to OBJECT to the omission of a specific evening economy policy.			
Stride Treglown on behalf of Coventry	R2: 7.1 1-7.1 3	Y	Y	Y	Y	In relation to retail uses within City Centre frontages, this policy is relevant to the University Group only in the context that it has delivered a number of ground floor active retail (food and beverage uses) within its estate. While these are technically not part of defined retail frontages, the University Group currently controls and could support further sui generis uses within this	Policy R2 appears to replicate a significant proportion of Policy CC1 and therefore it is suggested that Policy R2 should focus on defined retail frontages and corridors within the central retail hub of the City Centre, rather than cover wider	Comments noted. CCC propose to remove policy R2, as it largely replicates Policy CC1.	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
University (ID61)						estate: these would tend to be part of refurbished or mixed use academic or student support buildings and could include uses such as cafes, licensed premises, hot food units and performance venues. Such uses will be included within a building linked to demonstrable need (deficiency in provision generated by survey results for example) or as part of a repurposing strategy for a building or buildings linked to the Campus Masterplan. The acknowledgement that the integration of the University Group (and by implication, its ancillary facilities) are referenced within Policy R2 is supported. Notwithstanding this, Policy R2 appears to replicate a significant proportion of Policy CC1 and therefore it is suggested that Policy R2 should focus on defined retail frontages and corridors within the central retail hub of the City Centre, rather than cover wider aspects of development as covered by Policy CC1.	aspects of development as covered by Policy CC1. This representation is in the interests of supporting a justified and effective plan which offers clarity as to the relationship between similar policy approaches (CC1 and R2).	Given the changing nature of retailing, particularly in city centres, CCC consider that Policy R2 is no longer required and that Policy CC1 provides the necessary policy steer for the city centre area, including that of retail.	

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Natural England (ID37)	R2					Natural England generally accepts the rationale behind the policies within your plan. We would express additional support for the following elements. <u>Policy R2: Coventry City Centre – Development Strategy</u> 1. A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes; h. Accessible for all; i. Providing an attractive and safe environment for pedestrians, cyclists and motorists; j. Provide a high-quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure; ; p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for de-culverting wherever possible.		Comments noted. CCC propose to remove policy R2, as it largely replicates Policy CC1. Given the changing nature of retailing, particularly in city centres, CCC consider that Policy R2 is no longer required and that Policy CC1 provides the	No change

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								necessary policy steer for the city centre area, including that of retail and the comments made as part of this representati on.	

Policy R5 - Retail Frontages and Ground Floor Units in defined centres

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Tyler Parkes on behalf of PCCWM (ID69)	R5	Y	Y	N	Y	Whilst the PCCWM did not make any representations to the Regulation 18 consultation regarding this policy, nevertheless he considers that there is a case for specific policy reference to Gambling and Alternative Financial Services on the following lines: “proposals for all pay day loan shops, pawnbrokers, and gambling uses will take full account of any issues concerning community safety, crime, and disorder and will, where necessary, seek advice from the police and other safety organisations.” The Consultation Statement suggests, albeit in relation to Policy R2, that no justification has been made to justify such an addition to policy on the grounds that ‘In terms of gambling uses, the national picture shows a decline in high street	Introduce a specific policy reference to Gambling and Alternative Financial Services	As stated in the 2024 Retail and Centres Study the evidence shows that high street betting shops and associated establishments are declining due to rising costs and are moving to online provision. Therefore, a specific policy	No change

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						establishments due to online presence.’ However, the PCCWM considers that the justification arises from crime and safety issues that can, and does, occur in relation to such uses. The PCCWM therefore recommends the inclusion of a specific policy reference to Gambling and Alternative Financial Services.		purely for gambling establishments is in CCC opinion not necessary. Furthermore, given the SUI Generis use class, any change of use would require planning permission and as is established practice, the police would be consulted and an decision made based on all the available evidence and	

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								due development management processes. Therefore, a specific policy for sui-generis uses, which are numerous, would not be proportionate for a Local Plan.	

Policy R6 - Restaurants, Bars and Hot Food Takeaways

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Tyler Parkes on behalf of PCCWM (ID69)	R6	Y	Y	N	Y	The PCCWM made the following representation to the Regulation 18 consultation: “The PCCWM supports the proposed changes to Policy R6 but considers the justification to the policy should reference issues relating to hot food takeaways to include crime and fear of crime.” However, it is noted that neither the policy nor the justification for the policy includes reference to issues of crime and fear of crime in relation to hot food takeaways. Nevertheless, the justification arises from crime and safety issues that can, and does, occur in relation to such uses. The Consultation Statement does not acknowledge this representation, concluding that other than the inclusion of reference to the adopted Hot Food Takeaway SPD, the	The PCCWM considers that there is a case for specific policy reference on the following lines: 2. Proposals within defined centres will be permitted provided they: c. are in accordance with the emerging Adopted Hot Food Takeaway Supplementary Planning Document and any subsequent replacement, and promote a safe and secure environment which deters antisocial behaviour, crime and reduces the fear of crime	Comments noted. CCC considers the policy wording and SPD remain relevant and fit for purpose.	No change

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						policy remains fit for purpose with no further change. The PCCWM acknowledges that clause c. of Policy R6 states that proposals will need to accord with the Adopted Hot Food Takeaway SPD, which includes the following requirement: “In order to protect the amenities of nearby residents by promoting a safe and secure environment which deters anti-social behaviour, crime and reduces the fear of crime, proposals for hot food takeaways should provide evidence that crime and security matters have been taken into consideration and appropriately addressed. Advice can be sought from the West Midlands Police at the preapplication and planning application stages. Where appropriate, mitigation measures may be sought (as conditions), such as installation of lighting or CCTV.” Nevertheless, the PCCWM is concerned that without explicit reference to such matters in			

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						the policy itself, issues relating to crime and fear of crime are unlikely to be fully taken into account in the assessment and determination of planning applications and attributed little weight in the planning balance, particularly in the current absence of any policy in the consultation draft to reduce crime or the fear of crime.			

Chapter 8 – Communities

Policy CO1 - New or improved social, community and leisure premises

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legal Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Stride Treglown on behalf of Coventry University (ID61)	CO 1: 8.1 2-8.1 8	Y	Y	N	Y	The preamble to Policy CO1 makes passing reference to the University Group in para 8.15. This general statement acknowledges that “the Council will continue to work with both universities to enable on-going development of their masterplans”. The reference to University Group Masterplans in Policy CO1.3 is also supported. These key principles support, and justify (in part) the	The University Group objects to the wording in para 8.21. Such an objection would be removed if the Council were to amend the word “education” with the word “school”: the second part of a paragraph referring to the delivery of school places.	The intention of para 8.21 is to provide justification to the overall policy approach in CO1. The Council maintain that by including the word ‘education’ captures all educational facilities and not just schools. We can see	No change.

Local Plan Review

Regulation 19: Summary of Representations

Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						suggestion made by the University Group to suggest a new Policy CC2 Coventry University Group Campus as part of the suite of City Centre policies of the Local Plan. The University Group objects to the wording in para 8.21. Such an objection would be removed if the Council were to amend the word “education” with the word “school”: the second part of a paragraph referring to the delivery of school places.	This representation is in the interests of supporting a positive, justified and effective plan which offers clarity as to the positive impacts generated by utilising and unlocking the potential of the University’s estate within the City Centre (cross reference to CC1 and new Policy CC2 is advocated).	no reasonable justification for excluding Coventry (and other Universities) University educational facilities from this overall policy approach given the Council must help to protect social and community facilities and provide a robust policy approach when such facilities are proposed to be re-used or redeveloped.	

Policy CO2 - Re-Use of or Redevelopment of Facilities

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
NHS Property Services (London Office) (ID41)	CO2, paragraph 8.20			N	N	Draft Policy CO2 focuses on the provision of new community facilities when considering the redevelopment or re-use of existing community facilities. Point 1 specifically concerns the protection of existing facilities in requiring demonstration of criterion a. to c. to support the loss of a community premises. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be positively prepared or effective in its current form and would require amendments to Policy CO in line with our previous response at the Issues and Options stage (2023). Where healthcare facilities are included within the Local Plan definition of community facilities,	Proposed modification to Policy CO2: “1. Proposals for the re-use of redevelopment of community premises for a use outside the scope of this policy will not be supported if:... 2. Where healthcare facilities are declared surplus or identified as part of an estate’s strategy or service transformation plan where investment is needed towards modern, fit for purpose infrastructure and facilities, there will be no	No change as this would mean that the NHS would be treated differently to other providers. The justification would need to be made at the planning application stage and considered on a case by case basis.	No change

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community. The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay	requirement to satisfy Criterion a. to c. of Point 1. 3. In all cases consideration should be given to the suitability of the location for such facilities have regard to other Policies in this plan and its supporting documents. 4. Where replacement facilities are intended, they should..." Or in supporting paragraphs: "Where healthcare facilities are declared surplus or identified as part of an estate's strategy or service transformation plan where investment is needed towards modern, fit for		

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Regulation 19: Summary of Representations

Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						to vital reinvestment in facilities and services for the community. All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.	purpose infrastructure and facilities, there will be no requirement to satisfy Criterion a. to c. of Point 1.”		

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Regulation 19: Summary of Representations

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						Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information. To ensure the Plan is positively prepared and effective, NHSPS are seeking the following addition (shown in red italics) to Draft Policy CO2 and supporting paragraphs.			

Chapter 9 – Green Belt and Green Environment

Policy GB1 – Green Belt

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
MSP+D Ltd (ID35)	GB1 and Para 9.1-9.17	N	N	N	Y	The submitted Regulation 19 Coventry City Council Local plan policy DS1 “overall Development Needs, bullet points 3 and 4, are not legally compliant, sound or comply with the Duty to co-operate because: 7. Local Plan Review – Duty to Co-operate Statement.	To make the Coventry City Regulation 19 Local plan sound, the following changes are required to the submitted Reg 19 Coventry City Plan.	The matter of DtC, the quantum of growth and the shortfall are addressed under the Growth needs and	No change

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Page 11 of this document states that: <i>“As with Housing, the HEDNA was the starting point for assessing employment need. However work was also ongoing across the wider West Midlands region in terms of assessing strategic site (ie ‘big box’) needs as this has different site and locational requirement to local employment provision. The West Midlands Strategic Employment Sites Study (WMSESS) was finalised in September 2024, the result of a partnership of those authorities engaging in the West Midlands Development Needs Group referenced earlier in this paper. This details ‘opportunity areas’ for further exploration, and for Coventry this relates to ‘Area 7’ which will primarily relate to further joint working with Rugby Borough. Coventry is highly constrained and has no new sites which would meet the criteria set out in the study therefore discussions will be required as Rugby progresses its local plan.</i>	21. At least 45 hectares of land for employment use needs to be also allocated outside Coventry’s administrative boundaries. This excludes additional employment land required to meet strategic “big box” needs of the sub region. 22. Statements of Common Ground	employment policies. Discussions are ongoing with partner authorities and an update will be provided via a refreshed MoU and SoCGs where applicable.	

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Regulation 19: Summary of Representations

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						<i>On this particular (employment) issue, the total local need figure for Coventry for the period 2021-41 was calculated to be 105 hectares. From this Coventry had a supply of 60 hectares and a residual need of 45 hectares. Despite repeated Call for Sites, Coventry has made its partner authorities aware through the Duty to Co-operate discussions that it is unable to accommodate a 45 hectare shortfall. It has also made them aware that a Green Belt site (11 hectares developable to the east of the city) is being promoted but that it has been rejected through site assessment.</i> <i>Discussions are ongoing through CSWAPO and with the linked duty to Co-operate Group and associated Local Authorities in regard to this matter, but this currently remains an outstanding issue that has not yet been resolved. In part this is because</i>	between Coventry City Council and Coventry's neighbouring Local Planning Authorities need to be prepared and proposed sites subject to separate public consultation, identifying major new employment sites which will meet both Coventry's and the West Midlands employment needs both		

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to CooperateY/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						<i>most partner authorities are at earlier stages of plan preparation. The authority is continuing to work to develop an MoU with partners and working to establish Statements of Common Ground.</i> 8. The HEDNA Alignment Paper Considers that Coventry City Council should provide 105 ha of new Employment Land (B2 and B8) excluding any contribution to the strategic “big box” needs of the sub-region. Planning Assessment Paragraphs 24-27 of the NPPF of December 2023 sets out National Planning policy relating to maintaining effective co-operation in the plan making process, including the need to provide Statements of Common Ground.	within and also outside Coventry’s administrative boundaries. 23. These sites then need to be identified within the Reg 19 Coventry Local Plan and also in the forthcoming neighbouring Local Planning Authority’s Reg 19 Development plan reviews for submission in 2025/26.		

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						The Regulation 19 submitted plan's evidence base does not provide Statements of Common Ground with Coventry's adjacent Local Planning Authorities which specifically identifies employment site allocations for employment uses which meets the shortfall of employment land of 45 hectares so as to meet Coventry's employment needs either inside or outside its administrative boundaries – as well meeting strategic "big box" employment needs of the sub region.	24. If Statements of Common Ground identifying major sites which can deliver the shortfall of employment land cannot be agreed between Coventry City Council and the adjacent Local Planning Authorities then there needs to be a new employment policy within the Reg 19		

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							Coventry City Local Plan. 25. This new employment policy would support new employment site allocations on sustainable development sites within close proximity to the City's own administrative boundaries which can deliver both Coventry's and the sub regions employment needs.		

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Regulation 19: Summary of Representations

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							26. To deliver the acknowledged shortfall of employment land, the Coventry Local Plan also needs to have a policy which states that the green belt boundaries of all of Coventry's adjacent Local Planning Authority's need to be reviewed in order to help the delivery of major new employment sites.		

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							27. Some of the identified new major employment sites will therefore need to be released from the green belt because there is evidence that there are “exceptional circumstances” to do so and the these sites also no longer meet green belt designation criteria or are identified as		

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							"grey belt sites" in accordance with the NPPF of December 2024.		
Coventry and Warwickshire Chamber of Commerce (ID8)	GB1 and para 9.2 onwards	N	N	N	Y	The basis of the proposed draft policy is to set aside the opportunity to re examine the tight boundaries of Coventry's Green Belt and maintain the existing boundaries. As the Chamber has set out in its responses to the Overall growth policies (DS1) and employment policies (JE2 etc), the failure to address and review the Green Belt around Coventry establishes a planning framework that will stifle future growth and the opportunities for economic expansion. The Chamber rejects the approach that the Council is unable to identify only part of employment land need within its boundaries -it has chosen to insist there are no land	The Chamber of Commerce believes that the Council should be obliged to follow the current government policy guidance set out in the latest and most up to date version of the NPPF published in December 2024 before the formal release of this draft	The Council have developed the policies based on the Dec 2023 NPPF and have also updated the evidence base with a Green Belt Review Technical Update report in 2024. The Council therefore	No change.

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						opportunities and ignore areas of land, albeit designated as green belt that are suitable to accommodate new commercial growth, and which would not compromise the long established functions of Green Belt as set out in para 9.1. Moreover, the linking of the policy framework to the NPPF 2023 ignores important changes set out in the NPPF December 2024. This cuts across current government national policy by the application of a policy in relation to the Green Belt that sets aside the governments ambitions to ensure Green Belt is reviewed and to exclude consideration of important proposals such as the concept of “Grey Belt”. The latter provisions could provide important opportunities to bring forward smaller areas of land from the adopted Green Belt and see this brownfield type of sites being identified and developed for small scale new employment opportunities.	publication version of its plan .It calls on the council to amend this policy and review the GB boundaries before the draft plan is submitted to the Secretary of State.	maintain that the policy (together with all other GB policies) have been developed using robust and up to date evidence in accordance with the Dec 2023 NPPF.	

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						A review of the Coventry Green Belt boundaries would also bring into play consideration of the Green Belt boundaries adjoining the urban area of Coventry which are in surrounding local authorities. There is an opportunity here to promote joint working and, in part, identify practical solutions to meeting both local and strategic employment needs by releasing parcels of land on an agreed basis and under the provisions of the Duty to Cooperate. The Chamber is of the view that there are significant areas around the City boundaries where the defined Green Belt functions would not be undermined by selective releases from current GB that could provide both employment land and if needed additional land for housing. Such actions would support the vision and objectives that seek to underpin this draft local plan. (For example, the area specific areas at Ryton, in and around Ansty Park, adjoining Coventry Airport, land at Warwick University and in			

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						adjoining areas of Nuneaton Borough that could meet future growth requirements for a range of uses.) The Chamber has commented throughout this submission of the failure to provide any substantive information relating to the status of work by all the local authorities related to partnership working and specifically to Duty to Cooperate provisions. This makes it difficult to comment on the exact balance between urban capacity within the city boundaries and the potential to export some of that growth to surrounding areas.			
Tetlow King Planning on behalf of the West Midlands Housing Association Planning Consortium	GB1	N	N	N	N	The WMHAPC is disappointed that the Council has chosen not to include a separate Rural Exception Site Policy in the Regulation 19 Plan. We would like to take this opportunity to highlight that Paragraph 82 of the NPPF (2024) explains that “Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable	Respondent comment ‘Refer to previous representation response’	The Council have developed the policies based on the Dec 2023 NPPF and have also updated the evidence base with a Green	No change.

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(ID63)						housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.” Such sites are specifically recognised as exceptions to inappropriate development within the Green Belt. Paragraph 154(f) of the NPPF (2024) sets out the limited circumstances in which new buildings may be permitted in the Green Belt, including: <i>“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:</i> <i>f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites);”</i> (Our emphasis). Despite this clear national guidance, we note that the Council has not only declined to include a Rural Exception Site Policy but has also opted to remove reference to infill		Belt Review Technical Update report in 2024. The Council therefore maintain that the policy (together with all other GB policies) have been developed using robust and up to date evidence in accordance with the Dec 2023 NPPF. The Council considers that a rural exception site policy is not	

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						development within the Green Belt. As we previously raised during the Issues and Options consultation, the Council has not introduced policies that would support the delivery of affordable housing in rural communities within the authority area. Coventry's latest Annual Monitoring Report (AMR December 2024) highlights a consistent under delivery of affordable homes across the city. Furthermore, the Council's latest AMR also indicates that Coventry holds 2.59 years of supply. Introducing a dedicated Rural Exception Site Policy could help address this issue by facilitating much-needed housing in rural areas where land would not normally be considered suitable for development. Given the pressing need for affordable housing across Coventry as well as neighbouring authorities in Warwickshire, particularly in rural areas, we strongly urge the Council to reconsider its approach.		necessary or required given the policy is in accordance with the approach set out in the Dec 2023 NPPF and associated PPG.	

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						Implementing policies that enable the delivery of rural affordable housing would align with national policy and help ensure that the housing needs of all communities, including those in rural areas, are met.			
Oxalis on behalf of Hallam Land (ID46)	GB1	N	N	N	Y	Section 9 of the CCCLP sets out the Council's approach to the Green Belt and green environment. The HELAA (2024) explains that as the site being promoted by Hallam Land (of which these representations relate, please see the written representations for further information) is located within the Green Belt, it is discounted for development. The evidence, produced on behalf of the CCCLP, does not, in our view, robustly review the Green Belt in full due to it being a 'Technical Update Study' to a full Green Belt Review in 2015, and therefore assuming that development is inappropriate because a site is located within the Green Belt, is unjustified.	Recognising that there is an unmet employment land need within Coventry, the Green Belt should be thoroughly reviewed in a comprehensive assessment to ascertain the suitability of sites for their release from the Green Belt in these exceptional circumstances, as opposed to the	The Council have developed the policies based on the Dec 2023 NPPF and have also updated the evidence base with a Green Belt Review Technical Update report in 2024. The Council therefore maintain that the policy (together with	No change.

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						Notably, the HL proposed site north of the A45 (Site Ref: 'BAB-016-24') falls within a large area of Green Belt referred to as 'Northwest Coventry' (Area 1), this area is extensive, and the evidence base does not review smaller or discrete parcels within it. The assessment therefore does not comprehensively review the potential for changes to parts of this large area of the current Green Belt. The methodology used for the Update Study, stated at para 3.1 of the Green Belt Review, is that the review criteria needs to, "...enable evaluation as to how well an area of land meets the purposes of Green Belt as set out in the NPPF, and whether they can be developed in a sustainable manner if released." Taking the broadbrush approach that has been applied to Area 1 in the Update Study, does not enable consideration of whether there are locations within the now larger area, which could be developed in a	technical update study. The assessment should also narrow the assessment of land parcels rather than taking a broad-brush approach to thoroughly assess the Green Belt. If it is deemed that exceptional circumstances exist to remove sites from the Green Belt to meet the employment land deficit, then the policies map should be updated appropriately, which in turn would amend	all other GB policies) have been developed using robust and up to date evidence in accordance with the Dec 2023 NPPF.	

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						sustainable manner, nor how areas within it are influenced by changes that have taken place since the Joint Green Belt Study was prepared. The Green Belt Technical Update Study (July 2024, Coventry City Council) increases the size of the Area 1 parcel being assessed since the 2015 review - within which the HL promoted site forms a small part. The Update Study amalgamates smaller parcels from the previous Joint Green Belt Study (2015, LUC) and extends the area that has been assessed for Area 1, from land to the west of Pickford Lane, beyond the Coventry boundary and up to the boundary of Solihull (see para 4.4 of the Update Study). This therefore contradicts a comment at para 3.3 of the Update Study which states the same parcels and broad locations have been reassessed as per the Joint Green Belt Study (2015, LUC). The Parcel Scoring Assessment found at Appendix 2 of the Update Study notes that amalgamating the parcels into Area 1 is to	Policy GB1. Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025.		

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						reflect that the area forms part of the wider Coventry Area Green Belt. Area 1 has been assessed by re-utilising the scoring criteria from the Joint Green Belt Study 2015. This means the review is undertaken in a simplistic, broad way, that does not consider where in Area 1 the Green Belt functions and review criteria may vary, nor where there may be opportunity to release land from the Green Belt within that area. Furthermore, Appendix 2 of the Update Study (in relation to Area 1) does not identify where the site visits took place within the area, although there are 4 photographs of countryside included. Much of the field notes text describes the area around Coundon. There is no mention of the emerging development / built form at Pickford Gate, nor of the recently completed A45 road junction and associated infrastructure and drainage, which are notable urbanising features and development that have not been considered in the assessment. The assessment notes			

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						there are extensive views across the area, but this doesn't reflect smaller parts of it that have a degree of enclosure and more limited views. This highlights the issue with taking such a broad approach of Area 1 in the review. There is recognition that there are existing views towards the city from sections of the A45, Oak Lane and other lanes which suggests some urbanising influence. The Site (Ref: 'BAB-016-24') has a visual relationship with the countryside to the north and with the emerging development at Pickford Gate to the south of the A45; and the new A45 junction and infrastructure have an urbanising influence on the Site. Additionally, existing mature vegetation at Pinkett's Wood, around Oak Lane and north of Pickford, and the A45 / B4104 junction, provides a degree of existing visual containment which could be further enhanced and strengthened with additional landscaping as part of the development process. Therefore, there is potential for			

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						employment development within the Site which would incorporate an earthworks strategy to create the required building plateau which sensitively responds to the Site's topography, and proposed building heights that are appropriate to the context. Supported by the incorporation of a comprehensive approach to green infrastructure to break up built mass and soften the appearance of development, it is HL's view that the site could be removed from the Green Belt and developed without unduly compromising the wider role of the Green Belt on the western side of Coventry, and with suitable mitigation to minimise potential local impacts. The Council has, to date, not properly considered the potential opportunity of this site, and has simply relied on an assessment of much larger parcels within the Green Belt. The 2023 NPPF (para 145) states that Green Belt boundaries can be altered where exceptional circumstances are fully evidenced and justified. It is our			

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						position that exceptional circumstances have been evidenced and justified through the work prepared in support of the CCCLP, which provides an evidence base for the CCCLP Review. This includes the evidence of employment land need (identified by Icen) in the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) published in November 2022, along with the supporting Coventry and Warwickshire HEDNA – WMSESS Alignment Paper published September 2024. The 2023 NPPF requires strategic policy-making authorities to demonstrate that they have examined all other reasonable options for meeting identified needs for development before concluding exceptional circumstances exist (para 146). Having regard to the criteria set out in the 2023 NPPF para 146 it is clear that 'reasonable' alternative (non-Green Belt) options do not exist for meeting the identified employment land needs. The			

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						evidence demonstrates that even with maximum use of available brownfield and underutilised sites a very significant residual development needs remain. The Coventry City Council Core Area is covered extensively by Green Belt. For land use needs to be met and for the City and surrounding settlements to grow and to be economically successful and sustainable, changes to the Green Belt have been made in the past. Within this context, and in accordance with the NPPF, there must be a more 'positive and proactive' approach to meeting identified needs. There is no justification to promote a Local Plan which does not meet employment needs in full without having undertaken a more comprehensive process of seeking to identify additional greenfield (including Green Belt) sites. HL are of the view that the Site north of the A45 is less sensitive with regards to potential Green Belt harm than the wider area reviewed as part of the Green Belt Technical Update Study (2024) labelled			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						'Northwest Coventry' (Area 1). For reasons set out in Paragraph 4.8, the site can be sensitively developed so that it responds appropriately to its context and would therefore represents an opportunity to deliver additional employment land within CCC's boundaries. Please refer to the written representations submitted alongside these forms, as well as the supporting Savills report: Industrial and Logistics (I&L) Needs Assessment February 2025. Officer comment: See full representation for further detail.			
Marrons on behalf of Rainier Real Estate Re Westwood Heath Road (ID30)	GB1			N	Y	In response to Policy GB2, Rainier Real Estate explains why the extent of the safeguarded land designation for Land South of Westwood Heath Road needs to be reviewed, to ensure it is justified and consistent with national planning policy by removing 2024 HELAA Ref. WES-003-23 / FH Roofing from this designation. In reviewing the safeguarded land policy for this area there would be no justification		The Council have developed the policies based on the Dec 2023 NPPF and have also updated the evidence base with a Green Belt Review	No change.

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						whatsoever to return the Site to the Green Belt. The Site makes no contribution to Green Belt purposes in this location and would not compromise the fundamental aim of preventing sprawl and protecting openness in 2023 NPPF142-143, as set out in the accompanying assessment (EDP, February 2025). 2023 NPPF147 is clear that when reviewing Green Belt boundaries the need to promote sustainable patterns of development is fundamental, alongside giving priority to previously developed land. Site WES-003-23 aligns with both these national policy objectives, with the Council's 2024 HELAA evidence identifying the sustainability and accessibility of the Site in particular given is proximity to Warwick University. GB12023 NPPF148 sets out the requirements for reviewing Green Belt boundaries whereby in the case of WES-003-		Technical Update report in 2024. The site in question was reviewed as part of the GBR technical update. The Council therefore maintain that the policy (together with all other GB policies) have been developed using robust and up to date evidence in accordance with the Dec 2023 NPPF.	

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						23 the Site is not necessary to keep the Green Belt permanently open for the reasons explained above and a new boundary can be clearly defined using physical features that are readily recognisable on the ground and likely to be permanent (2023 NPPF148f). These permanent and physical features are significant and include Warwick University to the south and east, St John the Baptist Church and Featherbed Lane to the west, complemented by the extent of the Site's own boundary landscaping. The level of containment within the existing built-up area, urbanising features and landscaping mean that the Site can be released without compromising the openness of the wider Green Belt. All these features are existing and can provide a Green Belt boundary which endures beyond the plan period, in support of 2023 NPPF148(e). Whilst recognising that the LPR is being			

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						examined under the December 2023NPPF, there is a clear and significant direction of travel in national Green Belt policy through the December 2024 version and accompanying Planning Practice Guidance published on 27th February 2025. Under this new policy, even if the Site were not formally removed from the Green Belt through the LPR (as is requested by Rainier), it would clearly fall within the definition of 'grey belt' under the definition provided by Annex 2. The Site does not strongly contribute to purposes (a), (b) or (d) in NPPF143 and the application of policies in NPPF Footnote 7 would not apply, as explained in the enclosed assessment (EDP, February 2025, Appendix A). Officer comment: See full representation for further information			
Stephen McNaught (ID59)	GB1		N	N	Y	GB1 and the policies map should be amended to remove part of the Keresley site. Please see representations of Merle	Exclusion of part of Keresley SUE. See additional submissions.	The Keresley SUE was considered through the	No change.

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						Gering and Mark Sullivan plus additional submissions.		previous Local Plan and was found sound.	
Home Builders Federation (ID21)	GB1	N	N	N	Y	As stated elsewhere in our representation HBF believe that additional housing is needed in Coventry, as such a full Green Belt review should be undertaken. This is particularly important in light of the changes to the NPPF 2024 and the development of policy around Green Belt land which applies for development management purposes already. The Government has set out a clear direction for policy in the area, highlighting the need to consider all options to deliver housing to address the housing crisis. HBF suggest that the policy need updating and expanding to reflect this new national approach. HBF note that a full Green Belt review would require additional Sustainability Appraisal work. We would welcome the opportunity	Please refer to representation	The Council have developed the policies based on the Dec 2023 NPPF and have also updated the evidence base with a Green Belt Review Technical Update report in 2024. The Council therefore maintain that the policy (together with all other GB policies) have	No change.

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						to comment on a revised SA as part of the Green Belt review.		been developed using robust and up to date evidence in accordance with the Dec 2023 NPPF.	
Savills on behalf of Bellway Homes and Merton College (ID52)	GB1	N	Y	N	Y	It is noted that the updates to Policy GB1 have been supported by the Green Belt and Environment Background Paper (2024) and the Green Belt Technical Update (July 2024). Comments are set out below on these documents, followed by the draft changes to Policy GB1. The Background Paper explains that whilst there was no requirement to review the Green Belt, the Green Belt Technical Update had been prepared to understand whether there had been any changes in terms of Coventry's remaining Green Belt since the original evidence base was produced.	Please refer to representation	The Council have developed the policies based on the Dec 2023 NPPF and have also updated the evidence base with a Green Belt Review Technical Update report in 2024. The Council therefore maintain that	No change.

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						As explained above, Bellway and Merton College object to the approach to meeting housing and employment needs under Policy DS1. As set out, it is considered that the overall strategy is unsound, particularly as Coventry are seeking to proceed under the NPPF 2023, as opposed to the NPPF 2024. To positively plan and create an effective and justified strategy, Coventry should review the Green Belt. NPPF Paragraph 146 identifies that exceptional circumstance to undertake Green Belt review includes where an authority cannot meet its identified need for homes, commercial or other development through other means. Some parts of the Green Belt must be released to meet Coventry's needs in full. Until this review is completed, it is considered that Coventry's strategy in the Local Plan Review is unsound. Whilst it is noted that matters of Green Belt are dealt with by national policy, it is		the policy (together with all other GB policies) have been developed using robust and up to date evidence in accordance with the Dec 2023 NPPF.	

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						considered that Policy GB1 should be updated to reflect changes in national policy and the introduction of the Grey Belt, regardless of the fact that Coventry are seeking for the Local Plan Review to be assessed against the NPPF 2023.			
Coventry and Warwickshire Growth Hub (ID9)	GB1				Y	The Growth Hub has set out in its responses that the failure to address and review the Green Belt around Coventry establishes a planning framework that will stifle future growth and the opportunities for economic expansion. The City Council has chosen to insist there are no land opportunities and ignore areas of land, albeit designated as green belt that are suitable to accommodate new commercial growth. Release of these areas would not compromise the long established functions of Green Belt. The are important changes set out in the NPPF December 2024 in relation to the review of Green Belt. This new framework also introduces the concept of “Grey Belt”	There should be a commitment before the plan review progresses further to review Green Belt boundaries in accordance with current national planning guidance. As noted this could be a review conducted within the City’s boundaries or taken as part of a wider exercise	The Council have developed the policies based on the Dec 2023 NPPF and have also updated the evidence base with a Green Belt Review Technical Update report in 2024. The Council therefore maintain that the policy	No change.

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						and this, if introduced, could offer considerable potential to bring forward smaller scale employment sites across the City. Instead the Councils approach in this review sets aside the governments ambitions to ensure Green Belt is reviewed. Also as noted, a review of the Coventry Green Belt boundaries conducted alongside other surrounding local authorities, will also bring into play consideration of Green Belt boundaries adjoining the urban area of Coventry which are in surrounding local authorities. There is a missed opportunity here to promote greater joint working and to identify a set of practical solutions to meeting both local and strategic employment needs. The Growth Hub has commented throughout this submission of the failure to provide any substantive information relating to the status of joint activities by all the local authorities related to partnership working	involving the neighbouring local authority areas. The latter approach appears more likely to produce a set of long term defensible boundaries.	(together with all other GB policies) have been developed using robust and up to date evidence in accordance with the Dec 2023 NPPF.	

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						and specifically to Duty to Cooperate provisions. This makes it difficult to comment on the exact balance between the true employment land capacity within the city boundaries and the potential to export some of that growth to surrounding areas.			

Policy GB2 - Safeguarded Land in the Green Belt

Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Nexus Planni ng on behalf of CEG Land Promo tion III (CEG) (ID39)	GB 2	N	N	N	Y	CEG strongly object to the approach of Policy H1 as it is unsound as set out below. Coventry has a finite supply of land within its administrative area and recent delivery has relied upon creation of significant numbers of flats/apartments and PBSA. Coventry is also constrained by tightly drawn boundaries and is considered to have insufficient capacity when it comes to delivering family housing and consequently affordable housing which its own evidence confirms is acutely needed.	Consequently, to ensure that its needs are met, Coventry City Council should be endorsing locations that are well-related and connected to the City as sustainable locations for growth. With this in mind, the Council should be clearly recognising the opportunity for growth at Westwood Heath and proactively seeking that Warwick District Council bring forward development of the safeguarded land and the wider site under CEG's control, as a spatial growth option. Relevant to the Site at Westwood Heath, Policy GB2 states that "Any development of these sites will be subject to	At the time of writing, proposals are being considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District	No change.

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District and progress on the South Warwickshire Development Plan". Whilst this statement is agreed in principle, Coventry should be supporting spatial growth to the South of Coventry to address their housing requirements and worsening affordable housing issue. Both through the Duty to Cooperate and in the Local Plan Review, Coventry should be providing a mandate for WDC to make these critical decisions now, proactively seeking to address issues of affordability and housing type/mix which have manifested in the City. It should also be noted that in the WDLP that	Councils. As the SWLP has not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.	

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							policy DS21 establishes the principle of safeguarded land being released to meet longer-term strategic development needs. Policy DS20 also clearly identifies the broader area South of Coventry as an area of growth and in response to this, WDC gave Cabinet approval in April 2022 for the preparation of a wider south of Coventry masterplan. This confirms the importance of the Councils working collaboratively, as this masterplan area extends from Westwood Heath and eastwards to Coventry Airport; representing a significant area and opportunity to the south and south east of Coventry. Finally, the site is located in close proximity Coventry and to the University of Warwick's main campus, which is		

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							identified as a Major Investment Site.		
CPRE (ID12)					Y	The role of Policy GB2 is stated to be to safeguard some Green Belt land for housing along the boundary with Warwick District where it would be marooned by development in that authority's area (principally the King's Hill development area). This development has not started. There is no numerical justification for safeguarding that land. It should be returned to the Green Belt if the adjacent land in Warwick District is not developed.	Amend Policy GB2 to state that the Safeguarded Land shown on the Policies Map should be returned to the Green Belt if the adjacent land in Warwick District is not developed.	At the time of writing, proposals are being considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has	No change.

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								not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.	
Marro ns on behalf of	GB 2			N	Y	Policy GB2: Safeguarded Land in the Green Belt Not sound 105. Policy GB2 is not justified or consistent with national policy as it fails to reflect and	Policy GB2 should be amended to safeguard land south of Stoneleigh Road within Coventry to ensure proposals within the	At the time of writing, proposals are being	No change.

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Hallam Land (ID28)						appropriate strategy for South Coventry. The Policy identifies areas of safeguarded land in the Green Belt. These areas were identified in the 2017 Local Plan due to the potential longer term development options in Warwick District that required flexibility in being able to respond to emerging circumstances. The Council were keen to avoid Green Belt 'islands' which would not meet the purposes of the Green Belt (paragraph 9.4 to 9.8 of the Plan). 106. Land south of Stoneleigh Road (Site Ref: WAI-002-24) should be added to the list of sites within the Policy. It too is a potential Green Belt 'island' between the urban area and land which is a 'preferred option' for release from the Green Belt within Warwick District within the South Warwickshire Local Plan (SWLP). 107. Hallam Land have put forward land south of Stoneleigh Road as a comprehensive mixed use residential-led development through the Local Plan Review and South Warwickshire Plan (SWLP) processes. The land put forward	South Warwickshire Local Plan are not frustrated by Green Belt 'islands' consistent with the approach adopted in Policy GB2 with other former Green Belt land south of Coventry.	considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain	

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						crosses the administrative boundary between Coventry and Warwick. 108. It is important to note that whilst the land within Coventry's administrative boundary in isolation is not deliverable, it forms an important component of the wider proposal being promoted which would deliver significant economic and environmental benefits for the City through planned infrastructure as evidenced in these representations and within the submitted Vision Document, Illustrative Masterplan and Transport Representations. HL are therefore requesting its removal from the Green Belt and safeguarding for development consistent with the other sites within Policy GB2. 109. The land south of Stoneleigh Road comprises 11.87ha. The land is within the Green Belt but immediately adjoins the urban area of the City. The land is contained on 3 sides by housing development and contains buildings and is in part previously developed.		safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.	

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						110. The wider site within Warwickshire is bounded to the south by the ongoing development of HS2, which will form a cutting and create an enduring physical boundary for the development area. The Coventry Road forms a strong physical barrier on the western boundary of the site comprising mature blocks of trees and existing housing. An existing railway line runs through the middle of the site, between Coventry and Kenilworth. 111. To the north and north-east of the site, a large area of land is designated in the Warwick Local Plan for residential-led mixed use development through allocation H43 Kings Hill, which will form a compact urban extension that directly adjoins Coventry. Kings Hill in part already has planning permission. To the east lies the Finham Brook and its tributaries which is a defined boundary. 112. The nature of this wider site provides a unique opportunity for cross boundary co-operation (as already evident in the joint work			

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						already undertaken between the authorities) and allows for Coventry City Council to form a strategic partnership with the respective South Warwickshire Councils to deliver a significant uplift in sustainable transport infrastructure within South Coventry and also meet their identified housing needs in a sustainable manner. 113. The benefits of removing land south of Stoneleigh Road from the Green Belt and its safeguarding for development are set out within the Vision Document, but in summary: • Facilitate and assist with the delivery of planned investment in sustainable transport measures; namely public transport interchange and park and ride, the provision of EV charging at the interchange and in the longer term Coventry South Rail Station and Very Light Rail (see image within Vision Document) • Facilitate and assist with the delivery of a Transport Corridor in order to			

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						assist with delivery of Kings Hill to the north and improve connectivity to the University and beyond; • Improve the setting and character of the Kenilworth Road Conservation Area through the removal of through traffic; • Make best use of planned infrastructure as part of the Kings Hill SUE, and provide a seamless extension of this planned area; and, • As illustrated within the Vision Document, there is a real opportunity to deliver a development that is designed to be net zero carbon, climate resilient, well connected, healthy, safe and inclusive, biodiverse, well designed and beautiful. 114. The wider site is situated within Coventry's Green Belt, however as identified in the Green Belt Appraisal, February 2023, undertaken by FPCR on behalf of HLM and submitted as part of			

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						previous representations, it was concluded development on this site can be a compact addition to Coventry in an area that will be contained by significant infrastructure such as HS2 and the proposed Transport Corridor. 115. The Coventry Green Belt Technical Update Study (July 2024) considered release of the land south of Stoneleigh Road within Coventry would represent a clear encroachment into a sensitive open countryside gap amounting to urban sprawl. However, the South Warwickshire Green Belt Assessment (September 2024) of the wider land within Warwickshire concluded the land made a moderate contribution to Green Belt purposes.			
Marro ns on behalf of Rainier Real	GB 2			N	Y	Policy GB2 of the Local Plan Review (LPR) is unsound and needs to be reviewed and justified in accordance with 2023 NPPF test of soundness 35(b), and to ensure that the approach to Green Belt is in accordance with	The policies map should be amended to re-draw the safeguarded land designation to explicitly exclude the FH Roofing site (2024 HELAA Ref. WES-003-	At the time of writing, proposals are being considered for this	No change.

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Estate Ltd RE Westwood Heath Road (ID30)						national planning policy (2023 NPPF test of soundness 35(d)). Rainier Real Estate is specifically seeking revisions to area '1a. Land south of Westwood Heath Road' within Policy GB2. The FH Roofing Site (2024 HELAA Ref. WES-003-23) needs to be removed from the safeguarded land designation, formally removed from the Green Belt, and allocated for development under Policy H2. As set out in paragraph 9.7 of the LPR, land south of Westwood Heath Road was safeguarded in the adopted 2017 Local Plan in anticipation of future proposals being brought forward in Warwick District, through the South Warwickshire Local Plan (SWLP). In paragraph 9.8 the Council explains that given that the outcome of the SWLP is still uncertain then the safeguarded land designation will need to be considered through a future Local Plan update.	23), to address the soundness reasons raised above.	neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain safeguarded for the	

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						GB2 However, the extent of the area covered by the safeguarded land designation needs to be reconsidered now and as part of the LPR to specifically exclude 2024 HELAA Ref. WES-003-23 for the following reasons. - There has been a material change in circumstances since the safeguarded land area was designated and the 2017 Local Plan adopted creating an even more urban context surrounding Site WES-003-23. Land to the north, east and south of the Site was removed from the Green Belt as part of the Warwick District Local Plan Review 2011-2029 (adopted September 2017). New development has also been built and consented associated with the University of Warwick to the south of the Site, comprising new halls of residence west of Scarman Road (Sherbourne Residences), and new Social Sciences Quarter (consented, ref. W/23/0195) adjoining the Site's eastern boundary.		reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.	

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						- Given that Site WES-003-23 comprises Previously Developed Land (PDL) and is essentially contained by development on all sites – comprising the University to the south and east, St John’s Church to the west and Westwood Heath Road to the north – it would undoubtedly constitute a Green Belt ‘island’ which the safeguarded land policy is seeking to avoid (LPR, paragraph 9.5). The Site would also not meet the five Green Belt purposes established in national planning policy (NPPF143), further evidenced by the enclosed Green Belt assessment (EDP, February 2025 – Appendix A to these representations) and in response to Policy GB1. Continuing to safeguard Rainier’s Site under Policy DS2 cannot be justified (2023 NPPF test of soundness 35b) and a failure to formally remove it from the Green Belt conflicts with national planning policy (2023 NPPF test of soundness 35d).			

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						As well as Site WES-003-23 performing no Green Belt function, there is an evidential need to allocate the Site for development (specifically new Purpose Built Student Accommodation [PBSA], aligned with the University of Warwick Supplementary Planning Document (SPD, adopted 3rd December 2024 –Appendix B to these representations). The SPD is clear that the University anticipates “providing 1,200 net additional student bedspaces on or close to campus, either through direct development or in conjunction with private developers (what is known as Purpose Built Student Accommodation).” (SPD, page 14). Site WES-003-23 adjoins the core campus, as demonstrated in Figure 1, and is therefore sustainably located by foot and cycle to University. Support and recognition of the contribution that the University makes to the subregional economy is set out in the Policy DS2 6b of the LPR.			

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						The provision of new PBSA will be central to meeting Coventry's housing needs. This is already central to Policy H10 in the adopted Coventry Local Plan, with the need for PBSA reiterated in the Housing Topic Paper underpinning the LPR, with students favouring this accommodation over HMO-type provision. As well as supporting the ongoing growth and development of Coventry as a centre for higher education – linked to both Coventry and Warwick Universities -the allocation of specific sites for PBSA close to existing campuses will help to reduce/alleviate the loss of existing housing stock to HMO accommodation. The allocation of specific sites for PBSA will also support the government's objective to boost the supply of homes and ensure that "the needs of groups with specific housing requirements are addressed" under NPPF60. Officer comment: See full representation for further information.			

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Home Builders Federation (ID21)	GB 2	N	N	N	Y	Although HBF do not comment on individual sites, we would request that the Council uses this plan to takes decision about where much needed new housing should go and not put this off until a full and partial review of this Plan. The Housing crisis is current and increasing, a commitment to produce another document at some time in future does nothing to address this.	Please refer to representation	At the time of writing, proposals are being considered for many of the safeguarded areas in neighbouring areas through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has	No change.

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								not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.	
KOGG/Merle Gering (ID32)	GB 2	N		N	Y	There is no basis for policy GB2. The role of Policy GB2 is to safeguard some greenbelt land for housing where it would be marooned by development in neighbouring authorities.		At the time of writing, proposals are being	No change.

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Regulation 19: Summary of Representations

Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Given the new evidence, there is no numerical justification for safeguarding that land.		considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain	

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								safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.	
Stantec on behalf of Catesby Estates (ID56)	GB 2	N		N	Y	Commentary in respect of this Policy has already been provided in this Representation in relation to Policy DS2: The Duty to Cooperate and Partnership Working and is therefore not repeated again. However, for the avoidance of doubt, it is considered that this Policy is unsound for the reasons set out above.		At the time of writing, proposals are being considered for the safeguarded areas in the neighbouring area through	No change.

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						Officer comment: Please refer to the representation from this representor in Policy DS2 and to the full representation for further information.		the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the	

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								preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.	
David Cass (ID13)						The review of the Coventry City Council Local Plan may be adopted before the SWLP review is completed. Should the SWLP adopt policies that would render the safeguarding of land south of Westwood Heath Road (specifically land to the rear of 5 Featherbed Lane, St John's Church) unnecessary, it would be inequitable to require appropriate development proposals in this location, to have to wait for a full or partial review of the local plan, which may take 5 years or more, particularly as the land may be required to secure the conservation of a heritage asset.		At the time of writing, proposals are being considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being	No change.

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						To accommodate these circumstances, should the SWLP provide for development options on land in Warwick District and adjacent to Land South of Westwood Heath Road, so as to render a Safeguarded Land in Green Belt policy designation inappropriate, then Policy GB 2 should make provision for a release from Safeguarded Land, for appropriate development, without the need for a review of the Local Plan.		produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered	

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								through a future Local Plan update.	
Warwick District Council and Stratford District Council (ID70)	GB 2					Policy GB2: Safeguarded Land in the Green Belt We welcome the retention of safeguarded land in the Green Belt to the southern boundary of Coventry, acknowledging that the SWLP has not yet reached an advanced stage and therefore it would be premature to take any decisions with regards to allocation of that land. Warwick District Council and Coventry City Council are partners, alongside Warwickshire County Council and University of Warwick on a project known as the North of Kenilworth – South of Coventry Masterplan Framework project. This project is looking at opportunities and challenges and how they may be addressed within the area to the north of Warwick District and south of Coventry. As part of that work, connectivity and transport		Comments of support duly noted.	No change.

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						matters are an important consideration and the following comments are made in this context. Officer comment: Please refer to the full representation for this information.			

Policy GB3 - Local Green Space

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Home Builders Federation (ID21)	GB 3	N	N	N	Y	In order to be justified and effective the plan needs to be clearer on how this policy interacts with mandatory BNG. This is also important to ensure the plan is positively prepared and complies with national guidance on BNG from both DEFRA and MHCLG.	Please refer to representation	BNG is covered under separate policy and has specific mandatory requirements.	No change
Stantec on behalf of Catesby Estates (ID56)	GB 3	N		N	Y	Policy GB3 concerns Local Green Spaces. The preamble to the Policy confirms that the designation of land as Local Green Space is to protect green areas that are of particular importance to local communities, although no further explanation is provided as to the nature of the importance or what this means in practice. It goes on to describe how Local Green Spaces were formally designated	In order for Policy GB3 to be found sound, Land at Gibbet Hill Road should be excluded from the Local Green Space designation on the Local Plan Review Policies Map.	Agreed.	Correct the Plan Review Proposals map to reflect the designation as set out in the 2017 policies map.

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						through the 2017 Local Plan and are shown on the Policies Map. It concludes that Policies for managing development within a Local Green Space should be consistent with those for Green Belts, as described within the NPPF. Catesby Estates does not object to the wording of the Policy itself (that Local Green spaces should be considered consistently with Green Belt Policy within the NPPF). However, Catesby Estates objects to the designation of an area of Local Green Space shown on the Policy Map itself. This area of land is located to the south of Gibbet Hill Road and is within the control of Catesby Estates. As above, the preamble identifies two elements to Local Green Spaces:			

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						1. They were formally designated through the 2017 Local Plan; and 2. They are of particular importance to local communities. These to matters are discussed in turn below. A comparison of the Policies Map from the adopted 2017 Local Plan and the Proposed Submission Local Plan is included below [Officer comment: please refer to full representation for this, appendices and further information]. It is evident from the above that, despite the assertions of Policy GB3, the Local Green Space designation has been expanded and altered within the Proposed Submission Plan. This is not supported and has been done without justification, as described below.			

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						Paragraph 106 of the 2023 NPPF states: The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land. In respect of the above, the land in question is in private ownership and is not traversed by any public rights of way or bridleways. There is no public access of any sort to the site.			

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						Similarly, the land is heavily screened by vegetation on all four sides and there is therefore no visual connection or interaction between the site and its surroundings. The land has no historical significance nor is it ecologically rich (it is in agricultural use). It accordingly cannot be said that the land is of any importance to the local community and therefore it follows that the land does not meet the criteria for local green space designation. As such, Policy GB3 is unsound as it is not Justified or Effective, as it is not based upon accurate evidence.			
Natural England (ID37)	GB 3					Natural England generally accepts the rationale behind the policies within your plan. We would express additional support for the following elements.		Comments of support duly noted.	N/A.

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						<u>STRATEGIC POLICY Policy GB3: Local Green Space</u> 1. The city's Local Green Space boundaries are identified on the Policies Map. 2. 2. Inappropriate development will not be permitted unless very special circumstances exist.			

Policy GE1 -Green and Blue Infrastructure

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Home Builders Federation (ID21)	GE1	N	N	N	Y	STRATEGIC POLICY, Policy GE1 Green and Blue Infrastructure The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy In order to be justified and effective the plan needs to be clearer on how this policy interacts with mandatory BNG. This is also important to ensure the plan is positively prepared and complies with national guidance on BNG from both DEFRA and MHCLG.	Please refer to representation	BNG is addressed in policy GE3.	No change
Stride Treglown	9.10-	Y	Y	Y	Y	The University Group supports the City Council in its approach to embrace	The University Group considers that explicit reference should be made	Noted however it is considered that	No change

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behalf of Covent ry Univer sity (ID61)	9.1 9					“Green and Blue Infrastructure” policies and provisions in the Local Plan review. The University Group supports Local Plan Policy GE1 (part 5) and Policy EM4 (Part 10) to de-culvert hidden watercourses across the City Centre in order to add new integrated landscape, waterscape and biodiversity enhancements across the City. Opportunities to fund such proposals are likely to be afforded by the development of higher density urban living proposals which are likely to include Council owned assets. Such proposals would change the character of existing areas and support a balanced approach which invests in public realm and supports civic pride. The University Group will work with the City Council to ensure that connections between such areas and other parts of the City can be achieved across its estate, together with	within Policy GE1 to supporting a Green and Blue Environmental Agenda when reviewing the future of major thoroughfares in the City, particularly those no longer required to carry high levels of vehicle movements the result of re-routing proposals and schemes to support active and sustainable transport. A specific policy which captures the intent to deliver public realm changes along Cox Street should be captured in the Local Plan, reflecting previous urban greening proposals. This representation is in the interests of supporting a positive, justified and	existing policy wording is sufficient.	

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						the strengthening and linking of green and blue networks. The University Group considers that explicit reference should be made within Policy GE1 to supporting a Green and Blue Environmental Agenda when reviewing the future of major thoroughfares in the City, particularly those no longer required to carry high levels of vehicle movements the result of re-routing proposals and schemes to support active and sustainable transport. A specific policy which captures the intent to deliver public realm changes along Cox Street should be captured in the Local Plan, reflecting previous urban greening proposals. Opportunities along Cox Street and Fairfax Street (as advocated by Policy EM4 (Part 10)) would align with and generate additional positive public	effective plan which offers clarity as to the positive impacts generated by utilising and unlocking the potential of a traffic reduction strategy (as advocated throughout Chapter 12) and particularly involving roads which align with low level culverts.		

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						realm, air quality, noise quality and biodiversity gains to supplement the positive outcomes generated by the recent and ongoing University Group investment in Starley Gardens and the University Square area. Re-routing of vehicles to the north of the Code PBSA scheme and using Cope Street as part of a remodelled one-way public transport route offers the chance to remove vehicles from that part of Fairfax Street fronting the Leisure Centre site.			
Catherine Bunke (ID6)						Policy GE1 and EM1 Climate Change The Green and Blue Infrastructure evidence is out of date, and it is not enough to rely on the Local Nature Recovery Strategy which is at a very early stage.		The plan contains policy hooks to emerging strategy to ensure plan resilience over the plan period.	No change
Natural England	GE 1					Natural England strongly supports STRATEGIC POLICY Policy GE1 Green and Blue Infrastructure		Supported noted.	No change

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d (ID37)						1. The Council will protect and enhance green and blue infrastructure based on an analysis of existing assets, informed by, and contributing to the delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan or its future equivalent. 2. New development proposals should make provision for green and blue infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation, demonstrating how this links to the wider delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan.			

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						3. Coventry's existing and planned network of green infrastructure should be used as a way of adapting to climate change through the management and enhancement of existing and new habitats. The creation of new habitats will be supported wherever possible to assist with species movement, to provide a source of locally grown food through allotments and community gardens, to provide sustainable and active travel routes for people, to provide shade and counteract the urban heat island effect, and to assist in improving public health and wellbeing. 4. New development will be expected to maintain the quantity, quality and multifunctionality of existing green and blue infrastructure. Where quantity is not retained, enhancement to quality is expected. Where the opportunity arises, and in line with the city's most			

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						up-to-date Green and Blue Infrastructure Strategy and Action Plan, the Council will also expect new developments to enhance green and blue infrastructure, and create and improve linkages between individual areas. Any development which is likely to adversely affect the integrity of a green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place. 5. A key element of Coventry's approach to green and blue infrastructure will be the continued development of a network of green spaces, water bodies, paths and cycle ways, with priority given to those parts of the city where there is an identified deficiency of green space. Where a development proposal lies adjacent to a river corridor or tributary, a natural			

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						sinuous river channel should be retained or, where possible, reinstated. Culverts should be removed unless it can be demonstrated that it is impractical to do so. 6. Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green and blue infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes water bodies and other environmental assets, together with links to adjacent districts in Warwickshire and Solihull.			
Woodl and Trust (ID75)						Specifically, we would like to see the LP expand on these environmental principles in the following ways.		Noted however the plan wording is considered appropriate.	No change

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						• Protection of valued habitats must be at the heart of the LP. In particular, irreplaceable habitats, including AVTs, must be protected from loss and damage. To achieve this, the LP should: • Give weight to the relevant LNRS as it is refined. This should identify ancient woodland sites to ensure that development is not allocated in close proximity to ancient woodland. • For AVTs, the LP should encourage their recording on the Ancient Tree Inventory² as a matter of course and consider locations where it might be suitable to place a Tree Preservation Order on any ancient, veteran, or notable trees recorded. • Adhere to appropriate buffering standards for ancient woodland and AVTs: ▪ Preserve a 50-metre buffer³ between new developments and ancient woodland. Still greater buffers may be		A policy hook has been provided to the LNRS as the LNRS is under development.	

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						needed for major engineering work or disruptive post-construction activities. ▪ For AVTs, ensure a Root Protection Area that is 15 times the trunk's diameter or extends five metres beyond the canopy, whichever is greater. ▪ Assess the nitrogen impact of ammonia-emitting developments on ancient woodland less than five kilometres distant. • For non-AVTs, adopt the Bristol Tree Replacement Standard⁴ with respect to felling and specify replacement trees be planted no more than 12 times the distance of the original tree's trunk diameter, to correspond with root extent area. These measures will help safeguard the ecological integrity of ancient woodland and the health of AVTs in the face of development pressures.			

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						• The LP should give strong weight to LNRs for development site allocation at a local level: • This will be essential to embed avoidance of impacts to existing sensitive natural assets, by providing a 'spatial' element to site allocation decisions. It is vital that development is allocated in a way which protects important sites for nature, maintains ecological integrity and maximises potential enhancements from land in recovery. • Once a site has been allocated in a local plan, it is more likely to receive planning permission, so it is essential to embed ecologically coherent criteria for spatial prioritisation at the framework level. • LNRs should also be used to inform priority locations for the provision of green infrastructure, and habitat			

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						creation and enhancement through BNG. ² https://ati.woodlandtrust.org.uk ³ Buffering provides long-term protection against potential subsidence insurance claims. ⁴ https://bristoltreeforum.files.wordpress.com/2020/03/bristol-tree-replacement-standard-btrs.pdf			
Enviro nment Agenc y (ID15)						Water Quality and Resources We welcome reference to the Water Framework Directive (WFD) in Policies CC1 Part B and EM6 and the emphasis on Sustainable Drainage Systems (SuDS) in Policy EM5 and the preference for nature-based solutions in Policy GE1. WFD reference of course applies to the whole plan area, not just the City Centre.		Comments of support duly noted.	N/A.
WWT (ID71)	All		N	N	N	In terms of 'Policy GE1 and EM1 climate change– the Green and Blue Infrastructure evidence is out of date,	Add a more detailed Green Infrastructure policy and areas on the proposals map	The plan review has assessed sites and considers the	No change

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						and it is not enough to rely on the Local Nature Recovery Strategy which is at a very early stage and won't go far enough. Effective- the plan doesn't consider wider Green and Blue Infrastructure issues and opportunities for enhancement and the Wildlife Trusts 'Wildbelt policy'. The LNR is at a very early stage still and shouldn't be solely relied on.	has owing ambitious areas for enhancement in line with the NPPF. LNRS is at al too early stage to be relied upon. Or agree to additional SPD.	selection to be appropriate.	

Policy GE2 -Green Space

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Whitley Residents & Neighbourhood Watch Association Focus Group (ID74)	GE2:C			N	Y	Policy GE2: Green Space 1. States: Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation ... Yet strategic land use allocations such as in Strategic Policy H2: Housing Allocations and Strategic Policy JE2: Provision of Employment Land and Premises, may have areas of green space, particularly informal green space, as categorised in the adopted Coventry City Council Green Space Strategy (2019-2024) that is intended to be protected by Policy GE3. Policy GE2 and Policy GE3 appear to conflict with each other, and sites such as Local Wildlife Sites and Local Nature Reserves may not be afforded the protection that was intended by Policy GE3 if the wording of Policy GE2 remains the same.	Policy GE2: Green Space 1. States: Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation ... Suggested revised wording: 1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted.	The wording is considered appropriate and consistent with the previous approach.	No change

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Sport England (ID55)	GE2	Y	Y	N	N	Sport England note the continuation of the employment land allocation JE2:4 Land at Baginton Fields and South East of Whitley Business Park and housing allocation H2:19 Land at Mitchell Avenue, both sites include playing field land which could be lost as a result of the development of the sites. It is also noted that Policy GE2 Green Space allocates two sites for the provision of new sports pitches, to support the allocation of JE2:4 and H2:19. Sport England are unable to identify the potential replacement playing field sites highlighted in Policy GE2, with the site not appearing to be displayed within the proposal map. As such, Sport England are unable to make an assessment as to whether the two sites would be at least equivalent in quantity and quality to that proposed to be lost at site allocations JE2:4 and H2:19, in line with NPPF paragraph 104b and Policy GE2. Linked to this if there is a loss of provision playing field land, no assessment has been submitted to demonstrate that the playing field land (and ancillary	Sport England consider all site allocations which would result in the loss of playing field land (and ancillary provision) should be subject to Policy GE2 to ensure compliance with the requirements of NPPF paragraph 104. Sport England therefore consider the below text (strikethrough) should be removed from Policy GE2. Policy GE2 1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a	The allocations and associated policy wording were assessed and found sound through the process which led to the adoption of the 2017 Local Plan. GE2 refers to replacement sites at Charter Avenue or Coundon Wedge Road. The adopted allocation for Baginton Fields (JE2:4) links to GE2. However	Reference alternative provision in GE2 to ensure it is consistent with H2:19.

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						provision) is surplus to requirement in accordance with the abovementioned policies. As part of this a local assessment of need should be provided having regard to the Council's Playing Pitch and Outdoor Sports Strategy 2023. As such it is considered that the allocation of JE2:3 and H2:19 is not justified as it has not been demonstrated how the allocations meet the requirements of NPPF paragraph 104. Consequently, there is no justified reason as why the sites should not be subject to all of the policy requirements set out in Policy GE2.	~~strategic land use allocation,~~ or it can be demonstrated that..... More specifically, it should be demonstrated that Land at Charter Avenue and Land East of Coundon Wedge Road, proposed replacement sites for allocations H2:19 and JE2:4, meet the requirements of NPPF paragraph 104b (and Sport England Exception Policy E4). It should be noted that Land at Charter Avenue appears to be an existing playing field site, and it has not been demonstrated that it is not required to meet any shortfalls in playing field provision independent of being mitigation for the loss	adopted policy H2:19 also links to GE2 but refers to replacement playing field sites at Charter Avenue, Coundon Wedge Road 'or an appropriate alternative site within the local area as part of this development (in accordance with policy GE2)' . For consistency it would be	

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							of proposed site allocation H2:19. If the above, is not demonstrated Sport England consider that GE2 point 4 is deleted to ensure conformity with NPPF paragraph 104: ~~To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new sports pitches:~~ ~~Land at Charter Avenue (former Alderman Harris School site).~~ ~~Land east of Coundon Wedge Road.~~	appropriate to include reference to 'alternative provision' in GE2 to ensure sufficient flexibility. The reviewed plan includes a hook to ensure that the latest evidence is taken into account to inform planning applications	
Home Builders	GE 2	N	N	N	Y	Policy GE2: Green Space	Respondent comment 'Please refer to representation'	BNG is covered by policy GE3.	No change

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Federation (ID21)						The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy In order to be justified and effective the plan needs to be clearer on how this policy interacts with mandatory BNG, particularly the baseline assessment in the statutory metric. This is also important to ensure the plan is positively prepared and complies with national guidance on BNG from both DEFRA and MHCLG.			
Stride Treglown on behalf of Coventry University (ID61)	9.10-9.19	Y	Y	Y	Y	The University Group supports the City Council in its approach to embrace “Green and Blue Infrastructure” policies and provisions in the Local Plan review. The University Group supports Local Plan Policy GE1 (part 5) and Policy EM4 (Part 10) to de-culvert hidden watercourses across the City Centre in order to add new integrated landscape, waterscape and biodiversity enhancements across the City. Opportunities to fund such proposals are likely to be afforded by the development of higher density urban	The University Group considers that explicit reference should be made within Policy GE1 to supporting a Green and Blue Environmental Agenda when reviewing the future of major thoroughfares in the City, particularly those no longer required to carry high levels of vehicle movements the result of re-routing proposals	Support noted. The wording is considered appropriate and the plan is to be read as a whole.	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						living proposals which are likely to include Council owned assets. Such proposals would change the character of existing areas and support a balanced approach which invests in public realm and supports civic pride. The University Group will work with the City Council to ensure that connections between such areas and other parts of the City can be achieved across its estate, together with the strengthening and linking of green and blue networks. The University Group considers that explicit reference should be made within Policy GE1 to supporting a Green and Blue Environmental Agenda when reviewing the future of major thoroughfares in the City, particularly those no longer required to carry high levels of vehicle movements the result of re-routing proposals and schemes to support active and sustainable transport. A specific policy which captures the intent to deliver public realm changes along Cox Street should be captured in the Local Plan, reflecting previous urban greening proposals.	and schemes to support active and sustainable transport. A specific policy which captures the intent to deliver public realm changes along Cox Street should be captured in the Local Plan, reflecting previous urban greening proposals. This representation is in the interests of supporting a positive, justified and effective plan which offers clarity as to the positive impacts generated by utilising and unlocking the potential of a traffic reduction strategy (as advocated throughout Chapter 12) and particularly involving roads which align with low level culverts.		

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Opportunities along Cox Street and Fairfax Street (as advocated by Policy EM4 (Part 10)) would align with and generate additional positive public realm, air quality, noise quality and biodiversity gains to supplement the positive outcomes generated by the recent and ongoing University Group investment in Starley Gardens and the University Square area. Re-routing of vehicles to the north of the Code PBSA scheme and using Cope Street as part of a remodelled one-way public transport route offers the chance to remove vehicles from that part of Fairfax Street fronting the Leisure Centre site.			
Natura l Englan d (ID37)	GE 2					Natural England strongly supports the following: Policy GE2: Green Space		Support noted	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Whitley Residents & Neighbourhood Watch Association Focus Group (ID74)				N	Y	Policy GE3: Biodiversity, Geological, and Landscape Conservation 1. Sites of Special Scientific Interest (SSSI's), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. It is unclear how such sites, that could also be considered green space, particularly informal green space, as categorised in the adopted Coventry City Council Green Space Strategy (2019-2024), will be protected, if the sites are part of a strategic land allocation for development, such as in Strategic Policy H2: Housing Allocations and Strategic Policy JE2: Provision of Employment Land and Premises. Policy GE2: Green Space 1. States: Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation ...	Policy GE3: Biodiversity, Geological, and Landscape Conservation 1. Sites of Special Scientific Interest (SSSI's), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. This statement lacks clarity and certainty on how such sites will be protected from development, if such sites are included in a strategic land allocation for development as stated in Policy GE2	The wording is consistent with the adopted Local Plan which was found sound. It is not considered that the policy wording results on conflict between GE2 and GE3.	No change

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Policy GE3 and Policy GE2 appear to conflict with each other, and sites such as Local Wildlife Sites and Local Nature Reserves may not be afforded the protection that was intended by Policy GE3 (1).			

Policy GE3 - Biodiversity, Geological, and Landscape Conservation

Swifts Local Network: Swifts & Planning Group (ID62)	GE 3				Y	Policy GE3 is welcome but not currently sound nor effective nor consistent with national policy because sentence 1 (a) incorrectly suggests bird and bat boxes contribute to a 10% net gain of biodiversity (as calculated by the DEFRA BNG methodology), and does not mention swift bricks to be in line with the NPPG 2019 Natural Environment paragraph 023 which highlights the importance of swift bricks, nor NPPF December 2024 Paragraph 187 (d) (page 54) which states "planning policies should... incorporate features which support priority or threatened species such as swifts". In more detail, swift bricks along with other species features are excluded from the DEFRA Biodiversity Net Gain metric so need a separate clear policy. The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26). Swift bricks are universal nest bricks for small bird species, e.g. see NHBC Foundation:	Please delete current Policy GE3 1(a) reference to bird and bat boxes and replace with a new clause to be effective and consistent with national policy: Swift bricks are a universal nest brick for small bird species, and should be installed in new developments including extensions in accordance with best-practice guidance such as BS 42021 or CIEEM. Swift bricks are a significantly better option than external boxes as they are a permanent feature of the building with no maintenance requirements, improved thermal regulation, and aesthetic integration with the design.	The references says 'such as' so is not intended to be prescriptive and is intended to be flexible so that appropriate approaches can be tailored to the needs of each site. However, reference to swift bricks could also be added in.	Minor modification to include reference to swift bricks.

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					Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf), which are essential to save a variety of endangered red-listed urban building-dependent small bird species such as swifts and house sparrows. Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind. Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/)). The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/ This document is designed to empower local	Also please add for the same reason: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Coventry return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.		

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					authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways." Many other Local Authorities are including detailed swift brick requirements in their Local Plan, such as Tower Hamlets Local Plan Regulation 19 stage (Policy B04 paragraph 18.72, https://talk.towerhamlets.gov.uk/local-plan), which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020, and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;"			

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						https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19), and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/), so such an enhanced level should also be considered.			
CBRE on behalf of Network Rail (ID7)	GE 3	Y	Y	N	N	Policy GE3: Biodiversity, Geological, and Landscape Conservation (pp94 - 95) Some of the rail network within the local plan area is close to / forms part of local green space and / or local wildlife designations. Policy GE3 seeks to permit development in nature conservation designations where it protects and enhances biodiversity. On undesignated sites with biodiversity or geological conservation value, the Policy notes that development will be permitted provided it protects, enhances and/or restores habitat biodiversity. Network Rail has prepared a national Biodiversity Action Plan (December 2020). This aims to strike a balance between safety, performance, and environmental outcomes. The importance of the railway for biodiversity, including in connecting habitats, is fully recognised, and supported by Network Rail.	To specifically acknowledge this position, it is requested that the Policy be amended to state that there may be circumstances where proposals will be exceptionally permitted where the strategic benefits of a proposal clearly outweigh protection of nature conservation resources, notably where development is unavoidably required to maintain and improve the railway to keep it running safely and smoothly.	This is not considered necessary: there are already statutory provisions in regard to rail and circumstances will be considered on a case by case basis.	No change

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						There is however a need to ensure the best balance between biodiversity objectives and the ability to maintain and improve the railway to keep it running safely and smoothly. It is not always safe or practical to avoid all impacts on existing biodiversity features as part of this balance, and in situations where certain on-site impacts are unavoidable, Network Rail will seek to create appropriate habitats elsewhere, (in the local area where possible), to mitigate for and offset any impacts, also having regard to national legislative requirements. To specifically acknowledge this position, it is requested that the Policy be amended to state that there may be circumstances where proposals will be exceptionally permitted where the strategic benefits of a proposal clearly outweigh protection of nature conservation resources, notably where development is unavoidably required to maintain and improve the railway to keep it running safely and smoothly.			
Home Builders Federation (ID21)	GE 3	N	N	N	Y	Policy GE3: Biodiversity, Geological, and Landscape Conservation <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 100. HBF note the introduction of Biodiversity Net Gain which came in for	Please refer to representation	The council is not proposing a higher level of BNG. It is saying 10%. This has been factored in to	No change

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						large sites on Feb 12th 2024, and for small sites from 2nd April 2024. It will be important that this policy fully reflects all the new legislation, national policy and the new DLUHC and DEFRA guidance to ensure it fully reflects it 101. HBF has been involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness for some time, including feeding into the BNG Planning Practice Guidance from DLUHC and the DEFRA BNG Guidance. HBF note that this represents a lot of new information that the Council will need work through and consider the implications of, in order to ensure that any policy on Biodiversity Net Gain policy complies with the latest policy and guidance now it has been published. It should also be noted that the PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance. 102. HBF therefore suggest that significantly more information, assessments and analysis around BNG, and Viability (for BNG and viability more generally) is needed to support the new Coventry Local Plan.		the viability assessment.	

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						103. It is the HBF's opinion that the Council should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act. The Plan should provide certainty for developers and a clear BNG policy with a fixed 10% figure. There is not an option of seeking less than 10% BNG so the wording of criteria two which says 'no more than 10%' do not in fact reflect the current national policy and should be changed. 104. There are significant additional costs associated with biodiversity gain, which will need to be fully accounted for in the Council's viability assessment. It is important that BNG does not prevent, delay or reduce housing delivery. Although the national policies requiring 10% BNG cannot be subject to site specific viability discussions, any policy requirements over 10% can be. The Plan should make this position clear. 105. It is also important to note that for large and complex sites where the development is phased, the guidance is clear that the 10% must be delivered at the end of the development, and this may not result in 10% BNG on each			

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						phase. Additional advice on phased development has been provided in the new BNG PPG. 106. The costs of BNG should have been considered as part of the whole plan viability assessment and should be specified as a single specific item, not combined into a generic s106 costs item. There are significant additional costs associated with biodiversity net gain, which should be fully accounted for in the Council's viability assessment, some of which are still unknown at this time. It is important that BNG does not prevent, delay or reduce housing delivery. The costs relate both the financial costs and also land take- which will impact on densities achievable if BNG is provided on site. 107. As this is still a new policy area and the market for off-site provision, and statutory credits are not yet known, any figure used for BNG costs will need to be kept under review as BNG implementation progresses and a greater understanding of actual costs become available. The Whole Plan Viability Assessment should have clearly set out how it considered the implications of mandatory BNG and			

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						how it was arrived at using the most up to date BNG costs information available. 108. HBF welcome the reference in the criteria one of the policy about Local Nature Recovery Strategies, but suggest there is also a need for this policy and supporting text to say more. Reference should be made to if and how the West Midlands LNRS which came into force on 13th April 2024 has helped to inform and influence the policies and allocations in the Plan. 109. HBF would also request that the Local Plan allocation policies fully consider the issue of delivering against the new BNG requirements. This should include undertaking an assessment of the baseline to support the allocation to enable an understanding the BNG requirements for a site to be allocated and the impact this may have on viability and other policy requirements and considerations. It will be important to understand the BNG costs of mandatory BNG as this is non-negotiable and as such may impact on the viability of the site and its ability to deliver against other policy requirements such as affordable housing or other s106 asks.			

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						110. HBF also notes that there seems to be significant potential for confusion around environmental hierarchy, and suggest particular care is needed to avoid any confusion between the well-established mitigation hierarchy and the new BNG hierarchy. There is need for the policy wording and/or supporting text to be clearer about the differentiation between the mitigation hierarchy (which seeks to avoid harm in the first place, then mitigate and only then compensate it in relation to protected habitats) and the BNG delivery hierarchy (which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits). There seems to be significant potential for confusion between the two difference hierarchies. HBF therefore suggest that the Council should take particular care to explain how the requirements of the two-part BNG hierarchy work in different ways and that they seek to achieve different aims. 111. Reference should also be made within the Plan to the small sites metric. This is intended to be a less complex statutory metric that can be used to set out how 10% BNG will be secured on			

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					small sites. It can only be used for on-site BNG delivery. The national mandatory 10% BNG policy applies to small sites from April 2024. 112. The new DEFRA and DHLUC guidance is clear that going beyond the mandatory 10% requires evidence and there is a need to show that this will not impact viability. HBF agree that there is no evidence to support a higher figure in Coventry. However, the introduction of mandatory BNG is significant new requirement and it will be important for the viability implications of this new policy is considered in the whole plan viability assessment on the Coventry Local Plan. It will be important to understand if this non-negotiable national policy requirement has any knock-on implications for other policy areas 'asks', notably the amount of affordable housing that can be delivered. 113. The BNG and supporting text therefore needs updating to reflect the new West Midlands LNRS will also impacts on the density of housing schemes that can be provided, as land used for on-site BNG is not available for housing.			

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						114. HBF request the policy and supporting text are updated to properly reflect how BNG is being implemented in practice, and the viability assessment needs updating to reflect the true costs in terms of land take, financial costs and impact on time in bringing schemes forward.			
Stride Treglown on behalf of Coventry University (ID61)	9.20-9.25	Y	Y	Y	Y	It is important to acknowledge that that the University Group has invested considerable sums across the City Centre in recent years. Significant financial sums have been invested in enhancements to the public realm - notably Starley Gardens and University Square. The public realm enhancements might be considered part of the “glue” that binds the various University Group’s assets into a functional whole, but the investment made by the University Group is not within a closed campus – the benefits of the investment made is experienced by users of the City Centre irrespective of whether they have a connection to the university as an academic institution. The ongoing investment in the public estate as part of a robust and essential “placemaking agenda” is critical to secure the wider planning objectives of the Council and expectations of Coventry residents. The connections between destinations across the University Group’s Estate should be continued and developed,	This representation is in the interests of supporting a positive, justified and effective plan. To seek ongoing collaboration with the Council to share best practice and promote joint initiative, while potentially benefitting from academic research undertaken locally.	Noted	No change

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					alongside opportunities to deliver enhanced cycling, pedestrian and public transport which reduces the dominance of the car within the Inner Ring Round boundary. The University Group therefore welcomes that the Local Plan recognises the importance of green space in the city and wishes to investigate the possibilities of increasing standards for green infrastructure and biodiversity. Using both the Green Flag international Award criteria and Natural England's Green Infrastructure Framework (GIF) could provide the tools to support the Council's aspirations. The balance between nurturing green and blue infrastructure initiatives and meeting the space (building) needs of the University Group can be progressed through a University Campus Masterplan developed in collaboration with the Council's own plans for areas adjacent to the University Group's Estate. The University Group acknowledges the partnership approach it has taken with the City Council in relation to the activities of the Centre for Agroecology and Water Resilience (CAWR). Through its focus on food and water, the Centre's research develops and integrates new knowledge in social, agroecological, hydrological and environmental processes, as well as the pivotal role that communities play in developing resilience. Reference to this as an example of			

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						positive collaboration between local organisations is encouraged through references in the support text of relevant local plan policies.			
Catherine Bunke (ID6)						• Policy GE3 This is incorrect. It should refer to 'Local Wildlife Sites' and 'Potential Local Wildlife Sites', and it should say 'and enhance' and be more ambitious. Warwickshire Wildlife Trust has reiterated that in terms of Policy AC4 and Active Transport Provision, the plan needs to ensure it is balancing wildlife and transport needs.		The wording is considered appropriate.	No change
Natural England (ID37)	GE 3					Natural England strongly supports the following: Policy GE3: Biodiversity, Geological, and Landscape Conservation		Noted	No change
Woodland Trust (ID75)						• The LP must go beyond minimum requirements for BNG and be an example of best practice: • The LP should require all development projects to deliver 20 per cent BNG minimum.⁵ • Consideration should be given to the quantum of other investment sources (public and private) which will be needed in order to meet these targets. • The LP should require BNG units to be maintained for a minimum of 50 years, not just the 30 set out in the Environment Act.		The proposals would not be viable or deliverable.	No change

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						▪ This is particularly important for woodland creation, as it takes many decades for new woods to reach maturity and their full ecological potential. ▪ BNG should deliver a rich mix of habitats including native woodland, informed by LNRs. ▪ Habitat creation funded through other mechanisms (such as public funds) should also be maintained in the long term. ⁵The Biodiversity Metric 3.0 – JP039 (naturalengland.org.uk)			
WWT (ID71)	All		N	N	N	WWT are extremely concerned that the plan isn't: -Positively prepared- the plan doesn't positively consider wildlife/ Green Infrastructure and biodiversity and as it doesn't include our previously suggested 20% Biodiversity Net Gain. Which has been achieved in other councils such as Cornwall and has been viable in other local schemes. Policy GE3 - also should refer to 'Local Wildlife Sites' and 'Potential Local Wildlife Sites', and should say 'and enhance' and be more ambitious. Especially if the council is serious about meeting the 30 by 2030 in the Environment Act.	Remove 10% Biodiversity Gain and add the more ambitious 20% Biodiversity net gain. Based on local examples which prove this is viable in the area. Policy GE3 - should refer to 'Local Wildlife Sites' and 'Potential Local Wildlife Sites', and should say 'and enhance' and be more ambitious. Especially if the council is serious about meeting the 30 by 2030 in the Environment Act.	The wording is considered appropriate and 10% is viable, increasing this would compromise other parts of the plan which must be read as a whole.	No change.

Policy GE4 - Tree Protection

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
CBRE on behalf of Network Rail (ID7)	GE4	Y	Y	N	N	Policy GE4 requires that development should be designed around the need to ensure there is no unreasonable unavoidable loss of, or damage to, existing trees or woodlands during or as a result of development. Paragraph 9.28 of the written justification to the Policy notes that there may be exceptional circumstances where the benefits of development are considered to outweigh the benefit of preserving protected trees. This position is also reflected in criterion 1a of the draft Policy which identifies that development will be positively considered provided there is no reasonably	To add further clarity to the implementation of the Policy, it is recommended that specific reference is made to operational and rail safety considerations as an issue that would constitute such a circumstance to which criterion 1a of the Policy would apply.	Support noted. The Council does not feel it is necessary to include additional wording however as there are already statutory provisions in place in regard to rail and where appropriate these would be taken account of.	No change.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						unavoidable loss of, or damage to, existing trees or woodlands during or as a result of development. Network Rail supports this approach which would recognise that there may be operational and rail safety considerations that cannot reasonably be avoided. To add further clarity to the implementation of the Policy, it is recommended that specific reference is made to operational and rail safety considerations as an issue that would constitute such a circumstance to which criterion 1a of the Policy would apply.			
Home Builders Federation (ID21)	GE 4	N	N	N	Y	In order to be justified and effective the plan needs to be clearer on how this policy interacts with mandatory BNG. This is also important to ensure the plan is positively prepared and complies with	Please refer to representation	The Green Belt and Green Environment background paper and associated evidence base provides the	No change.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						national guidance on BNG from both DEFRA and MHCLG.		necessary links to BNG.	
Natural England (ID37)	GE 4					Natural England supports this policy		Comments of support duly noted.	No change
Woodland Trust (ID75)						The Woodland Trust is the UK's leading woodland conservation charity. We own over 1,000 woods throughout the UK and our head office is in Grantham. Our aims are to protect existing woodland, create new woodland, and enable people to enjoy and appreciate woodland. Trees and forests are crucial to life on our planet. They stabilise the soil, generate oxygen, store carbon, play host to a spectacular variety of wildlife, and provide us with raw materials and shelter. They offer us respite, inspire our imagination, creativity and culture,		Noted however it is considered that the wording of policy is sufficient and proportionate.	No change

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						and refresh our souls. A world without trees and forests would be barren, impoverished and intolerable. We are interested in working with Coventry City Council in developing policies beneficial to trees and woodland in its emerging Local Plan (LP). We would also like to work with this authority to enable it to better protect woodland, particularly irreplaceable habitats such as ancient woodland, and Ancient and Veteran Trees(AVTs), and to plant trees as part of a well-planned network of green infrastructure. The Council's tree canopy cover is just 9.6 per cent, which contrasts to an average of 38 per cent across the EU. Therefore, we believe that woodland creation and conservation should be a major priority for the LP.			

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Principally, it is key to select the right tree for the right place and, while we recognise the role nonnative trees will play in meeting near-term targets, as well as the ability of some to confront specific concerns like air pollution on busy streets, they should be minimised both to prevent the introduction of pests and diseases through tree importation (viz. biosecurity risk) and to offer the greatest ability for already-existing flora and fauna to benefit. The maximum possible proportion of new trees should be native, and UK and Ireland Sourced and Grown (UKISG).¹ Not only are some pests hazardous to human health, but supporting local nurseries and tree growers confers an economic benefit. The overall ambition should be for a canopy cover of 30 per cent in new developments.			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						It is essential that the climate and nature crises are addressed jointly, with trees' remarkable ability to fight each recognised by the LP. Resolving the nature crisis resolves the climate crisis, but this is not necessarily true the other way around. So, while encouraged by the LP's references to trees' biodiversity contribution, we would like it to go further, assigning definite BNG targets while grasping future opportunities afforded by Local Nature Recovery Strategies (LNRs) required by the Environment Act 2021. Complementing these should be a robust commitment to protection for individual AVTs where identified. Specifically, we would like to see the LP expand on these environmental principles in the following ways. • Protection of valued habitats must be at the heart of the LP. In particular,			

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						irreplaceable habitats, including AVTs, must be protected from loss and damage. To achieve this, the LP should: • Give weight to the relevant LNRS as it is refined. This should identify ancient woodland sites to ensure that development is not allocated in close proximity to ancient woodland. • For AVTs, the LP should encourage their recording on the Ancient Tree Inventory² as a matter of course and consider locations where it might be suitable to place a Tree Preservation Order on any ancient, veteran, or notable trees recorded. • Adhere to appropriate buffering standards for ancient woodland and AVTs: ▪ Preserve a 50-metre buffer³ between new developments and ancient woodland. Still greater buffers may be needed for major engineering work or disruptive post-construction activities.			

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						▪ For AVTs, ensure a Root Protection Area that is 15 times the trunk's diameter or extends five metres beyond the canopy, whichever is greater. ▪ Assess the nitrogen impact of ammonia-emitting developments on ancient woodland less than five kilometres distant. • For non-AVTs, adopt the Bristol Tree Replacement Standard⁴ with respect to felling and specify replacement trees be planted no more than 12 times the distance of the original tree's trunk diameter, to correspond with root extent area. • The LP should set standards for high-quality green infrastructure for development: • Major developments should provide five UKISG-compliant trees per dwelling or per 1,000m² of non-residential floorspace.			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						• Similarly, no one should be more than 300 metres from the nearest natural green space, with safe and accessible routes. • Consideration should also be given to the Woodland Trust's Access to Woodland Standard which aspires that everyone should have a small wood of at least two hectares in size within 500 metres of their home, and a larger wood of at least 20 hectares in size within four kilometres of where they live. • A strong tree retention standard 6 for responsible development must also be embraced, ensuring the preservation of trees and their ecological benefits. This standard will require a thorough tree survey during initial site investigations, categorising trees by their health and quality (A, B, C or U), and submitting a clear Tree Retention Plan. Additionally, it will mandate the creation of a Tree			

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Regulation 19: Summary of Representations

Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Protection Plan, safeguarding tree root systems and establishing construction exclusion zones (CEZs). In summary, we consider that the Environmental Principles must be treated as a foundational component of the LP. As part of incorporating the principles, the LP must support the protection of sensitive natural assets, such as AVTs; be an exemplar of emerging BNG practice; and set high standards for the retention and provision of trees within developments. ¹ https://www.woodlandtrust.org.uk/about-us/what-we-do/we-plant-trees/uk-sourced-and-grown-scheme/			
WWT (ID71)	All		N	N	N	WWT is also disappointed that the Tree Canopy Target has also been removed. Which would help deliver the councils ambitious climate change targets,	Add Tree Canopy Target back in, in line with the Councils declared Climate Change Emergency and the	Policy GE4 did not reference a tree canopy target: nothing has been	No change

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Regulation 19: Summary of Representations

Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						biodiversity emergency status and national targets such as 30% land in nature recovery by 2030 in the Environment Act.	Environment Acts target of 30% land in nature recovery by 2030.	removed in this regard.	

Chapter 10 – Design

Policy DE1 - Ensuring High Quality Design

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined Authority (ID67)	DE1 (Part T)	Y	Y	Y	N	N/A	Policy DE1 Part T states that car parking should be integrated into developments but assumes car parking is a requirement, contradicting city centre policies. The impact on pedestrian and cyclist safety should also be considered.	Modification to add 'where applicable' at the start of part t. Cycling and pedestrian safety	Modification to part t to say 'where applicable'

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
								are included in the AC policies section	
Transport for West Midlands - West Midlands Combined Authority (ID67)	DE1 (Part U)	Y	Y	Y	N	N/A	Policy DE1 Part U combines cycle parking with waste management facilities. Cycle parking should have a separate policy section.	Minor change could be made to separate out the two points	Minor change to split out part U into parts U (cycle parking / storage) and V (waste)
West Midlands Resource Technical Advisory Body (WMRTAB)(ID73)	DE1	n/a	n/a	n/a	N	WMRTAB notes and broadly welcomes policy in the Coventry Local Plan which requires proposals for housing and residential development to ensure adequate waste storage and collection (Policy DE1);	n/a	Noted	No change

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Mineral Products Association (ID33)	DE1	No response	No response	N	N	The UK has a wide variety of local building materials that make an important contribution to the quality and character of our built environment so to accord with para 135 of the NPPF, their use should be supported in planning policy.	We would propose the following additional wording is added to policy DE1 part 5 (b):b. consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design using local building materials where appropriate;	Noted, it is considered that this is already implicit in the policy wording however a modification could be incorporated as proposed	Potential modification to include reference to the use of local building materials
Tyler Parkes on behalf of PCCWM (ID69)	DE1	Y	Y	N	Y	The PCCWM made the following representation to the Regulation 18 consultation: “Whilst the PCCWM supports the encouragement of high-quality design in the City, he objects to the	For the above reasons, the PCCWM considers that there is a case for Policy DE1 to be strengthened under Paragraph 5 to make specific reference to measures to reduce crime, the	The council considers these proposals are	Potential modification as shown in council’s response

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						lack of specific reference in Policy DE1 to recognising that good design can have a role in reducing opportunities for crime. Given this is the key policy on design in the Local Plan, it makes no reference to designing to reduce fear of crime, anti-social behaviour or promoting design that discourages crime or to securing high-quality design in all developments by, inter alia, requiring achievement of Secured by Design, Park Mark or other such initiatives, to achieve the environmental and social benefits of reduced crime and fear of crime. This is a significant omission. It is noted that proposed Policy DE1 in the Issues and Options contains reference to other matters that are already covered by other policies in the Local Plan, e.g. heritage, biodiversity etc. Given the proven link between design and crime, it is considered wholly appropriate that	fear of crime and anti-social behaviour to read: g. provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces; h. consider the safety and security of new and existing users, showing how these considerations have informed the design process and should also include a maintenance plan to reduce crime, the fear of crime and antisocial behaviour on an ongoing basis. Developers will be encouraged to seek advice from Design Out Crime Officers where appropriate; u. Provide safe, secure, convenient and accessible provision for cycle parking	disproportionate. However a modification could be considered to require applicants to demonstrate how the required 'secured by Design' principles have been met and a	

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						similar reference is made in a revised Policy DE1, in the bullets under an amended point 3.” Whilst the Consultation Statement does not make reference to this representation, nevertheless the PCCWM is pleased to note that his representations are reflected in the reasoned justification for the policy and includes reference to these matters, notably at paragraphs 10.2 and 10.6: 10.2 In all cases well designed, safe and well-maintained streets and public spaces can help encourage walking and cycling and can reduce antisocial behaviour and crime including the perception and fear of crime for all in the community. 10.6 Policy DE1 requires development proposals to create safe and attractive streets and public spaces, which reduce crime and the fear of crime. As well as considering the impact of	and storage that will be required to integrate ‘Secured by Design’ and ‘Park Mark principles, facilities for waste management, recycling and collection in a manner that is appropriately integrated within the overall development; In addition, a further Paragraph 8 could be added to the Policy to read: 8. All proposals should also include a maintenance plan to reduce crime, the fear of crime and anti-social behaviour on an ongoing basis. In particular, the inclusion of new sub-paragraph 8, above, would go some way to assuage the concerns of the PCCWM regarding the omission of similar measures to reduce crime, the fear of crime and anti-social behaviour from	management plan show how they will be maintained	

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						development proposals on public safety and the incidences of anti-social behaviour, the reference to safety in the Policy also relates to creating buildings and places that are better protected from terrorist attack, this reflects the Government's strategy for countering terrorism. This is reflected in part 5 of Policy DE1 that expects all development to meet certain key principles, including: g. provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces; h. consider the safety and security of new and existing users, showing how these considerations have informed the design process; u. Provide safe, secure, convenient and accessible provision for cycle	policies DS3, H7, H10, H13, R2, R5, and R6, the omission of an evening economy policy and a specific policy reference to Gambling and Alternative Financial Services as set out in the corresponding representations, and with respect to policies AC1, AC4, AC5 and AC6 (see corresponding representations). Without the suggested additional text and further subparagraph to Policy DE1, the PCCWM raises an OBJECTION. Alternatively, but less preferable, the reasoned justification and policy could be amended to read: 10.2 In all cases well designed, safe and well-maintained streets and public spaces can help encourage walking and cycling and can reduce anti-		

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						parking and storage, facilities for waste management, recycling and collection in a manner that is appropriately integrated within the overall development; Whilst the PCCWM largely supports Policy DE1, nevertheless he suggests that it should be strengthened under Paragraph 5 to make specific reference to measures to reduce crime, the fear of crime and anti-social behavior.	social behaviour and crime including the perception and fear of crime for all in the community. Developers will be encouraged to seek advice from Design Out Crime Officers where appropriate. 10.6 Policy DE1 requires development proposals to create safe and attractive streets and public spaces, which reduce crime and the fear of crime and developers will be encouraged to seek advice from Design Out Crime Officers where appropriate. As well as considering the impact of development proposals on public safety and the incidences of anti-social behaviour, the reference to safety in the Policy also relates to creating buildings and places that are better protected from terrorist attack, this reflects		

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							the Government's strategy for countering terrorism.		
Home Builders Federation(ID21)	DE1	N	N	N	Y	STRATEGIC POLICY, Policy DE1 Ensuring High Quality Design <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> 116. Criterion 3 of this policy again seeks to make compliance with an SPD a Local Plan policy requirement. If the Council wish to provide additional advice on the interpretation of any policy, this should be done through a Supplementary Planning Document, which is prepared and consulted on after the Local Plan policy has been adopted. It	Please refer to representation	Noted and where relevant SPDs will be updated in due course	No change

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						cannot be done through trying to give Local Plan policies status to an existing SPD, especially as the existing SPD hangs from the adopted policies in the Local Plan, which will be replaced when this new Local Plan is adopted. Supplementary Planning Documents should by definition be supplementary to the Local Plan.			
Stride Treglown on behalf of Coventry University (ID61)	10.1-10.7	Y	Y	Y	Y	The University Group is disappointed that references and proposals cited at the time of the 2023 Issues and Options Consultation draft that Policy DE1 consider the implications arising from a growing younger age profile is not carried across to the Reg 19 Draft. In this regard, the managed growth of the University Group, in addition to the underlying	The observation is made that the opening paragraph of the policy cites that "All development proposals should follow a design-led approach to deliver sustainable, high quality placemaking". The University Group suggests that clarification should be made that this reference can include both building design and/or	Noted regarding proposed wording at reg 18 and a modification could be	Modification to include proposed wording

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						population, offers opportunities for a larger younger population to live, study, work and play in the City. This issue is linked to the bespoke housing needs of students and young professionals and therefore underpins the need to consider alternative models of affordable housing such as co-living and Build to Rent. The observation is made that the opening paragraph of the policy cites that “All development proposals should follow a design-led approach to deliver sustainable, high quality placemaking”. The University Group suggests that clarification should be made that this reference can include both building design and/or landscape led design principles from the outset, depending on the circumstances of the project.	landscape led design principles from the outset, depending on the circumstances of the project. The 2023 Reg 18 Issue and Options Consultation suggestion to include wording within Policy DE1 (3) (b) “to promote ‘responsive architectural innovation’ that would encourage developments to advance a new period of the City’s legacy of architectural innovation to reinforce Coventry’s identity as a city for built environment innovation” has not been carried forward into Reg 19 draft. The University Group objects to this omission and seeks its reinstatement as part of an innovative and positive design-based policy.	made to add the proposed text in to the reviewed plan part 5 b, or alternatively in DE1 part 1	

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						The 2023 Reg 18 Issue and Options Consultation suggestion to include wording within Policy DE1 (3) (b) “to promote ‘responsive architectural innovation’ that would encourage developments to advance a new period of the City’s legacy of architectural innovation to reinforce Coventry’s identity as a city for built environment innovation” has not been carried forward into Reg 19 draft. The University Group objects to this omission and seeks its reinstatement as part of an innovative and positive design-based policy. In this regard, consultants appointed by the University Group to progress concept masterplan ideas within its Cathedral Quarter has researched the modernism development principles embedded in the 1950’s and 1960’s. It is important to note that the	This representation is in the interests of supporting a positive, justified and effective plan which reflects the ambition to deliver high quality design responses and which advocates designs that celebrate the history of the City in delivering architectural innovation.		

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						economic life of buildings erected in this period was assumed to be 60-70 years, therefore the propensity of certain buildings to be viably retained during the life of the Local Plan Review will reduce over time. The University Group is keen to be part of the delivery of a new legacy of built form in a manner that preserves elements of the modernist ideologies of the past. The University Group considers that there are important aspects of the 1950-60's vision that remain valid in 2025 and which can be adapted to meet the contemporary needs of the City and the University. These are: Setting buildings into the established green landscape. Using clean, simple and crisp building forms.			

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Strategically using height in a small number of key buildings. Working to the established grid that aligns with Cox Steet and Cope Street (within the University Quarter). The University Group is keen further explore these opportunities in relation to the design and delivery of its development ambition including: Improving the sense of place with better natural wayfinding throughout the University Group Estate and stronger view corridors between key spaces and features. Making more of the rich landscape by stitching together all of the established green pockets throughout and beyond the University Group estate to create a more seamless park setting in which individual buildings are located.			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Improving the active travel infrastructure and connectivity of the University Group Campus through the provision of new high-quality walking and cycling facilities. Consideration as to how new micro-mobility and emerging zero carbon transport can be safely incorporated into the design and delivery of new developments and spaces. How proposals for the Civic Centre can supplement its wider development ambition alongside opportunities to work with multiple agencies to secure wider regenerative benefits as part of a coherent strategy within the City Centre.			
Natural England (ID37)	DE1					Natural England especially supports the following elements of this policy. STRATEGIC POLICY Policy DE1 Ensuring High Quality Design b. consider the local distinctiveness and identity of the site but also have regard to opportunities to		Noted	No change

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						enhance the local built and natural environment through new development and enhanced design; n. be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density; o. consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate); q. minimise adverse impact on important natural resources; r. conserve and enhance biodiversity; and s. respect and enhance landscape quality including trees, hedges and other landscape features of value.			

Policy DE2 - Delivering High Quality Places

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined Authority (ID67)	DE 2	Y	Y	Y	N	N/A	Policy DE2 requires developments of 10 or more residential dwellings to include walking and cycling routes. Should this not be a standard requirement for all residential developments?	This relates to major developments and is felt to be a proportionate approach in regard to on site provision	No change
Turley on behalf of the University of Warwick (ID68)	DE 2	Y	Y	N	Y	Part 2 of this policy refers to Public Art and supports public art being an integral part of the design process, noting that an alternative to standalone public art is the incorporation of art into the design of buildings, through the use of glasswork/ironmongery etc. Part	The University of Warwick propose that part d of Policy DE2 be amended as follows in order to make it sound: <i>d. Where public art is provided, contributions and commuted maintenance sums for up to 10 years will be required where</i>	Noted and potentially a modification could be considered	Potential modification as proposed

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						2d notes that where public art is provided, contributions and commuted maintenance sums for up to 10 years will be required. The support for the integration of public art within building designs is welcomed by the University. However, the reference to commuted sums being required in connection with public art is not appropriate within the University campus. The campus includes a number of features of public art which are maintained by the University. Any new elements of public art on the campus, whether standalone or integrated within building design would be maintained by the University. It would not be appropriate for the University to pay a commuted sum to the Council to undertake such	<i>appropriate and justified and include the cost of decommissioning where appropriate.</i>		

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						maintenance. This part of the policy is therefore considered to be unsound as it is not effective or justified.			
Savills on behalf of Bellway Homes and Merton College (ID52)	DE 2	N	Y	N	Y	New Policy DE2: Delivering High Quality Places 4.44. It is noted that Part (5) to new Policy DE2 relates to meanwhile uses. Whilst the principle of considering meanwhile uses is positive, it is noted that the policy requires "Vacant plots/sites planned for redevelopment must investigate provision of meanwhile/temporary uses prior to commencement of any redevelopment work.". It is therefore not clear as to how such uses must be investigated and whether this needs to be formally demonstrated in any	Please refer to representation	Comments noted and for redevelopment proposals (including demolition) it would be expected that this would be formalised through the development management process by application of a condition where appropriate.	No change

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legal Compliance? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						manner. This requirement would benefit from clarification.			

Chapter 11 – Heritage

Policy HE1 – Conservation Areas

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Stride Treglown on behalf of Coventry University (ID61)	HE 11.3	Y	Y	Y	Y	In relation to Conservation Areas, the University Group would support the comprehensive review of each Conservation Area to confirm that their designation and boundaries remain appropriate.	This representation is in the interests of supporting a positive, justified and effective plan.	Noted	No change

Policy HE2 - Conservation and Heritage Assets

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Historic England (ID19)	HE2	No response	No response	Y	N	Policy HE2: Conservation and Heritage Assets <i>Historic England (HE) welcomes this policy being carried forward into the Local Plan Review and we are pleased to see reference to Historic England's Good Practice guidance in the proposed additional clause 9.</i>	N/A	Noted	No change
Tyler Parkes on behalf of PCCWM (ID69)	HE2	Y	Y	N	Y	The PCCWM made the following representation to the Regulation 18 consultation: "The PCCWM requests that Policy HE2 'Conservation and Heritage Assets' be amended to include a bullet point to address the significant problem of Heritage crime. Theft of lead flashing, cast-iron down pipes and other historic artifacts is a significant problem, particularly in Conservation Areas and for Listed Buildings. The PCCWM recommends the introduction of policy wording which would allow for a pragmatic	For the reasons set out in his original representation, the PCCWM considers that Policy HE2 should be amended to include the following bullet point: "Favourable consideration will	The policy wording is considered appropriate	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						approach to the replacement of historic and traditional materials stolen. Rather than seeking 'like for like' replacement, use of 'alternative' products available on the market, such as those produced by Yeoman Rainguard and other suppliers in the market should be encouraged. Replacement of stolen goods effectively by 'replica' products which visually match items stolen would prevent repeat theft and mean that the building owner was not vulnerable to this crime again. The Consultation Statement does not acknowledge this representation, and it is extremely disappointing that the requested amendment has not been incorporated into the policy. For the reasons set out in his original representation, the PCCWM considers that further consideration should be given to his recommendations in the interests of reducing heritage crime and the fear of crime. The PCCWM therefore OBJECTS to the omission of the requested bullet point.	be given to the use of approved 'alternative' materials to replace building materials and artefacts stolen to reduce crime and the fear of crime"		

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Stantec on behalf of HGIT Central Coventry Ltd (ID57)	HE2.1, HE2.4			N	Y	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	Respondent comment: 'Please refer to representation'	Comments noted, the details of each site would be dealt with on its own merits through the development management process	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						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			

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						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.			

Policy HE3 - Heritage Park – Charterhouse

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Historic England (ID19)	HE3	No response	No response	Y	N	Policy HE3 Heritage Park Charterhouse <i>Historic England (HE) welcomes this policy being carried forward into the Local Plan Review. In relation to para. 11.10 it should be noted that the river Sherbourne is canalised in front of Charterhouse and this contributes to its significance. We suggest a minor amendment to the wording of para 11.10, with reference to renaturalisation – please see below.</i>	We suggest that para 11.10 is amended to read “....of the river valley where this does not conflict with its heritage significance”.	Noted and consider proposed modification to the paragraph could be made	Minor modification as proposed
Coventry Society – Trevor Cornfoot (ID11)	HE3	Y	Y	N	N	The Coventry Society agrees with and supports policy HE3 and the wording in paragraphs 11.9-11.11. The policy is a continuation of that in the current Coventry Local Plan, approved in 2017. However the context of policy HE3 has changed, affecting the geography of the Charterhouse Heritage Park. The map at Appendix 5 outlining the boundary of the Heritage Park is now outdated and should be replaced. In recent months the management of the Heritage Park has passed to the John Muir Trust, working in partnership with the City Council, Historic Coventry Trust and Warwickshire Wildlife, to “develop plans to regenerate this unique wildplace in the heart of Coventry” (JMT press release	The map at Appendix 5 should be replaced by that attached - or a map similar to it – that correctly identifies the current boundaries of the Charterhouse Heritage Park.	The map is correct	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						1.11.24). The Trust has previously stated that “although unmanaged for decades and despite some antisocial behaviour issues and inaccessible areas, the Charterhouse Heritage Park has considerable biodiversity value, lots of engagement opportunities and a huge potential for ecological enhancement, including areas of wetland, woodland and grassland” (JMT press release 28.6.24). In passing the management of the Heritage Park from the City Council and the Historic Coventry Trust to the John Muir Trust the geographic area of the Heritage Park has been expanded, considerably. It no longer occupies a notional ‘couple of fields’ between the Charterhouse and London Road (as shown in the map in Appendix 5) but occupies a much larger area that includes the previous area but now runs further south, in the valley of the River Sherbourne, to pass under the West Coast mainline railway, past the incinerator and recycling plant to the London Road Gyratory roundabout at grid reference SP347772. As a result of this expansion of the geographic area of the Heritage Park the map at Appendix 5 now fails to represent the operative boundaries of the Heritage Park. Attached is a map showing the geographic extent of the Heritage Park now being managed by the John Muir Trust.	This will reflect the current and future realities of the management responsibilities of the John Muir Trust. There is no need to amend the text of paragraphs 11.9-11.11 or policy HE3. The need for an accurate, current map of the boundaries of the Heritage Park should be obvious – it more properly identifies the areas to which policy HE3 applies thus helping to		

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							protect the defined Heritage Park area from inappropriate development proposed by developers, or indeed, the City Council. The policy and correct map thus sets the context for the Management Plan for the Heritage Park to be developed and implemented by the John Muir Trust, City Council, Historic Coventry Trust and Warwickshire Wildlife. Incorrect boundaries of the Heritage Park		

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							could put their investments at risk.		

Policy HE4 - Archaeology

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Historic England (ID19)	HE4	No response	No response	Y	N	Policy HE4 Archaeology Historic England welcomes the inclusion of this new policy and accompanying text in the Local Plan. We suggest some minor amendments to wording – please see below.	Accompanying text <i>We suggest that para 11.13 is amended to include observations of previously unrecorded archaeology (not in the HER) identified during the assessment process to be considered. We suggest that the bullet points area amended as follows:</i> • “Known archaeological sites recorded on the Coventry HER” • “Other places, spaces.....and identified on the Coventry HER or as part of assessment work to inform development”. <i>In addition, we suggest that para 11.14 b) be amended to read:</i>	SoCG in train with HE, and modified wording to the policy agreed. SoCG being finalised, see DtC compliance statement for correspondence and SoCG when finalised	Modified wording to be provided in agreement with HE

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							<i>".....prior to the determination of an application or prior to commencement of development".</i> Policy HE4 <i>We suggest that clause 2 should be amended to read:</i> <i>"The information and understanding gained ~~should~~ must be made publicly available,..." in order to remove the optional element.</i> <i>We suggest that clause 4 should be amended to read:".....City Wall, must conserve them and enhance their setting through design".</i>		

Overarching comments (non-policy)

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Stantec on behalf of HGIT Central Coventry Ltd (ID57)	Heritage Background Paper (November 2024) and Coventry Canal Conservation Area Appraisal (July 2012)			N	Y	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	Please refer to representation	Noted. The process of updating conservation area appraisals is beyond the scope of the Local Plan Review	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						impacting upon Central City Industrial Estate. 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			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						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			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						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			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						failing to properly assess the contributions of sites to the conservation area. Officer comment: Please see full representation for appraisal Statement & Response table and further information			

Chapter 12 – Accessibility

Policy AC1 - Accessible Transport Network

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined Authority(ID67)	AC1	Y	Y	Y	N	N/A	The reference to the National Design Guide is welcomed, but it would be beneficial to also include a specific reference to LTN 1/20 for cycling infrastructure, alongside other key documents such as Inclusive Mobility.	Specific references were removed as national guidance may change and this approach provides resilience.	No change
Transport for West Midlands - West Midlands	AC1	Y	Y	Y	N	N/A	Support for proposals that reduce car dominance and improve conditions for active travel and public transport is welcomed.	Comments are noted.	No change

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Combined Authority(ID67)									
Turley on behalf of the University of Warwick (ID68)	AC1	Y	Y	Y		Policy AC1: Accessible Transport Network The University acknowledges and supports the inclusion of a stronger emphasis on the need to prioritise active and sustainable modes of transport in terms of integration with the surrounding networks. The inclusion of placemaking and local connectivity to reduce dependence on private vehicle trips is an important addition as well as integration between the built form and delivery of new and improved local transport networks prioritising walking and cycling and sustainable modes of travel in both a local context and within strategic growth corridor locations.	N/A	Comments are noted.	No change
Tyler Parkes for PCCWM (ID69)	AC1	Y	Y	N	Y	The PCCWM made representations to the Regulation 18 consultation with regard to policy AC1: Accessible Transport Network. The PCCWM agrees that the Council should encourage sustainable means of transport and supports policies to provide sustainable alternatives to the use of private cars and promoting public transport. However, the PCCWM requested that the changes to this policy should explicitly reference the need for	For the reasons set out in his original representation, the PCCWM considers that Policy AC1 should be amended to include the following additional point under subparagraph 3: 3. Development proposals which are expected to generate additional trips on the transport network should:	Policy AC4 requires walking and cycling routes to be safe, however once passengers are on public transport this is outside of planning's remit.	No change

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						measures to ensure the safe travel of passengers and pedestrians. Safety is considered to be a key driver facilitating sustainable forms of travel. Again, the Consultation Statement does not acknowledge this representation, and it is disappointing that specific reference to the need for measures to ensure the safe travel of passengers and pedestrians has not been included in the reasoned justification or the policy. The PCCWM therefore OBJECTS to the omission of reference to the need for measures to ensure the safe travel of passengers and pedestrians under the above policy.	c. Include measures to ensure the safe travel of passengers and pedestrians		
Stride Treglown on behalf of Coventry University (ID61)	AC1 12.9	Y	Y	Y	Y	Consideration should be given as to how active travel training is provided by the council through funding obtained through developer contributions. The University Group Campus makes up a considerable part of the city centre and active travel can encourage further greening of the city centre if implemented appropriately through enhancing local spaces and encouraging a modal shift to more sustainable modes. The University Group notes the Council are proposing the develop the first Very	This representation is in the interests of supporting a positive, justified and effective plan. To seek ongoing collaboration with the Council to share best practice and promote joint initiative, while potentially benefitting from academic research undertaken locally.	Including a reference to support funding for active travel training is support and the most appropriate place to include this is in policy AC4. The Council also welcomes collaboration with the university to share best practice and initiatives.	Wording to be added to the end of point 2 in Policy AC4 to say, "which could include funding for cycle training."

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						Light Rail scheme in the UK. As part of this local plan review, the University Group would welcome discussions with the Council regarding the route development of this scheme to ensure that there are new links provided between education, employment opportunities and key local residential areas.			
Natural England (ID37)	AC1					Natural England welcomes the desire to encourage active travel within STRATEGIC POLICY Policy AC1: Accessible Transport Network		Comments noted.	No change

Policy AC2 - Road Network

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Keith Whitehead (ID25)	AC 2			N	Y	I do not consider that Land at Baginton Fields will enable the delivery of a sustainable development and therefore is not consistent with National Policy. The West Midlands Investment Zone expects up to 10,000 additional jobs on the south side of the A45 adjacent to the Land at Baginton Fields. This Investment Zone has two main entrances both onto the A45. The A45 will also be one of the main routes to and from Land at Baginton Fields. Concentrating employment allocation in a location that is expected to see up to 10,000 additional jobs does not appear sound. In Coventry's Climate Change Strategy 2024-2030, an objective is to	Modifications considered necessary to make the Local Plan Review sound As it is suggested that most of land known as Baginton Fields is an unsound location for employment allocation and that this section of the representation is asking for modifications considered necessary to make the Local Plan Review sound I believe alternatives should be suggested.	Baginton Fields is an existing employment allocation site in the adopted 2017 plan and is part of the West Midlands Investment Zone. This situation has not changed.	No change

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					reduce congestion. Land at Baginton Fields will add to congestion as the land south of the site will largely be for employment with little housing so is unlikely that staff will use active travel. In the preamble for Policy AC2, downloaded from Council's website, it shows in table 10.3 a prediction of up to a 42% increase in peak hour trips by 2031. Additionally the A45 is already a concern for congestion. From CRSTS award Assessment in 2022 it included statements "Poor journey time reliability on key corridors such as the Eastern Bypass. High traffic volumes on the A46, A45". From CRSTS award Assessment in 2022 it says a 58% reduction in car mileage between 2016 and 2035 would be needed for car CO2 emissions to be in line with a 'well below 2°C' pathway. This points to locating employment closer the housing so that there can be more active travel and for employment allocation to be aligned with housing allocations. Including Baginton Fields as an employment allocation into an area that	The basis for an alternative site or sites should include the following characteristics. Employment allocation is most viable when it is adjacent to an area of population. South of Baginton Fields is an Investment Zone and will have very few residents. A principle to avoid Climate Change is to try and have employment close to housing to minimise travel by car and encourage walking and cycling. Baginton Fields is a poor location for this. The A45 is already a concern for congestion. From CRSTS award Assessment in 2022 included statements "Poor journey time reliability on key corridors such as the Eastern Bypass. High traffic volumes on the A46, A45". Additionally the West Midlands Investment Zone		

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						may have up to 10,000 additional jobs and staff travelling to work, in my view, could significantly add to congestion which is contrary to Coventry's Climate Change Strategy 2024-2030 and will not contribute to achieving a sustainable development.	expects up to 10,000 additional jobs adjacent to the Land at Baginton Fields which only has two main entrances both onto the A45. The A45 will also be one of the main routes for this site. In the preamble for Policy AC2, downloaded from Council's website, it shows in table 10.3 a prediction of up to a 42% increase in peak hour trips by 2031. The concentration of employment around the Baginton section of the A45 will exasperate this problem. Employment needs to be spread more widely around the City and again Baginton Fields is a poor location. From 3.11 in Regulation 19 Proposed Submission it is stated that "Midlands Strategic Employment Sites Study (WMSESS) 2024 has therefore been jointly produced by several Local Authorities across this area		

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						to guide this work.” In finding employment location it is recognised that Coventry does not have the space to accommodate the necessary developments. Hence the search for an alternative location should include all these Local Authorities. Coventry is growing and expanding its housing by over 30%. Employment should be located near these new housing estates. Hence suggestions of where the 25ha of employment allocation would be more sustainable include: Near Kings Hill development Enlarging the 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension (SUE). Near the Keresley housing allocation. Land in neighbouring Local Authorities.		

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Turley on behalf of the University of Warwick (ID68)	AC 2	Y	Y	Y		Policy AC2: Road Network The University supports the inclusion within Policy AC2 to require developments to support the provision and integration of intelligent mobility infrastructure, such as EV charging. This ensures a more significant and continued provision of EV infrastructure across the UK is achieved to meet the targets set by the Government. The University's Masterplan SPD also seeks to significantly increase EV provision for car, bikes, service vehicles and scooters on campus as part of a forward-thinking mobility strategy.	N/A	Comments are noted.	No change
Stride Treglown on behalf of Coventry University (ID61)	AC 2 12. 23- 12. 24	Y	Y	N	Y	Whilst supportive of the principle, the University Group must object to the current drafting of Policy AC2.2. At present, the Policy supports on-site provision of measures such as EV charging. However, power infrastructure can be a barrier to providing additional EV charging facilities. The University Group wishes to work collaboratively with the Council on the changes to policy AC2 to better understand the plan for the delivery of the power requirements for new areas of EV charging in and around the City	The Council is requested to confirm that this provision only applies when a viable means of power can be applied to the site. This representation is in the interests of supporting a positive, justified, effective and deliverable plan. To seek ongoing collaboration with the Council to share best practice and promote joint initiatives, while potentially benefitting from academic research undertaken locally.	The Council supports the positive approach of the policy requiring developments to provide EV charging points. Detailed matters will be dealt with at the planning application stage. The Council also welcomes collaboration with the university to share best practice and initiatives.	No change

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					Centre and the University Group’s Technology Park. The policy accepts that off-site provision is possible only when demonstrated not be viable on-site. The capacity of the power network should be applied to located EV chargers is locations remote from the development being applied for. The Council is requested to confirm that this provision only applies when a viable means of power can be applied to the site.			

Policy AC3 - Demand Management

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined Authority (ID67)	AC3	Y	Y	Y	N	N/A	Policy AC3 states that Travel Plans will be required for new developments. Will mode shift targets be updated to reflect ambitions for increased sustainable travel?	Mode shifts will be determined on a case-by-case basis, needing to be proportionate to individual proposed developments, therefore the current wording is considered robust.	No change
Transport for West Midlands - West Midlands Combined Authority (ID67)	AC3	Y	Y	Y	N	N/A	Policy AC3 would benefit from a clear definition of micro-mobility.	A definition of micro-mobility is considered a reasonable amendment; however this is currently referenced in policy AC4.	Add clarification to explanatory text in policy AC4.
Turley on behalf of	AC3	Y	Y	Y		Policy AC3: Demand Management	N/A	The Council considers the accessibility policies to be	No change

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the University of Warwick (ID68)						The University supports the additional reference at Paragraph 3, relating to the wider consideration of active and sustainable modes forming part of the delivery of new parking provision. There is also support of the inclusion to encourage and incentivise sustainable travel through the provision of Mobility Credits. However, the University still advocates that credits will only be successful if the individuals continue to commit to the travel behaviour change once the credits expire. Therefore, developments must invest in high quality active design, placemaking and integration with the surrounding transport network to ensure sustainable and active travel is a real, long-term alternative as set in Policy AC1.		robust in promoting high quality active design, placemaking and integration with the surrounding transport network that ensures sustainable and active travel can be a real, long-term alternative.	
Stride Treglown on behalf of Coventry University (ID61)	12.1 5-12.2 8 AC3. 3	Y	Y	Y	Y	Car Parking policy should be informed by a robust evidence base and the reliability of alternatives. The University Group is committed to reducing single-occupancy car travel and supporting sustainable forms of commuting for staff and students. Staff and student surveys are prepared by the University Group to inform approaches to investment in personal mobility, public transport and active travel initiatives.	This representation is in the interests of supporting a positive, justified, effective and deliverable plan.	Comments are noted and the council welcomes close collaboration with the University Group. Policy AC4 supports the “seamless integration” of transport modes together with the provision of high-quality cycle parking.	No change

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					The University Group remains supportive of, and is committed to delivering development proposals in accordance with the provisions of the Adopted 2017 Local Plan, particularly the Multi-Storey Car Park on Lower Ford Street as referenced in Policies CC23 and CC24. The University Group accepts that parking is part of a wider strategic approach which are underpinned by sustainable development principles. The growth in anticipated student numbers from a low point in 2019 will increase at a rate far higher than the corresponding provision of parking spaces, but it has to be acknowledged that a relatively high percentage of university staff live beyond the city's boundary and while car sharing on arterial routes into the university continues to be supported, the regular working patterns of individuals attending campus are now compromised by the introduction of hybrid learning arrangements and new pedagogies. The number, type and management of car parking spaces remains an active		The parking provision is considered robust and proportionate. Mobility hubs are addressed in Policy AC5. The Council supports the positive approach of the policy requiring developments to provide EV charging points. Detailed matters will be dealt with at the planning application stage.	

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					part of the University Group's approach to access, movement and parking and ongoing analysis of staff and student surveys to be undertaken during the Autumn semester (the busiest within the academic year) continues to help inform revisions to the strategy and investment decisions. Joint working with the Council to explore mutually beneficial EV charging points and mobility hubs to support cycling is encouraged, with resultant policies and proposals capable of being captured within the Local Plan review. The University Group welcomes further discussions on the further nuanced approach to parking provision, namely under what circumstances future car parking provision would be deemed acceptable to support the university's operational needs. It is also suggested that as part of the Local Plan review and subsequent review on the transport design guidance, that details on sustainable multimodal sustainable transport hubs are considered for future developments. The University Group is committed to managing car parking proportionally to the number of staff and students at the			

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					university and to managing the existing car parking provision in the best way possible. Therefore, the University Group would feel that new car parking provision should be only permitted when there is a robust justification to do so. This consideration should be factored into the updated parking standards and that a pragmatic approach should be taken to parking provision. The University Group supports the idea of any new car parking provision having a high provision of EV charging facilities and associated high-quality provision for cyclists and walkers such as dedicated cycle hubs. However, available power networks will be critical to any delivery strategy. The Local Plan should therefore acknowledge the City Council's leadership in partnership discussions with utility providers to deliver the infrastructure necessary to support the initiative. Only through exceptional design and a robust operational justification should new or increased parking provisions be appropriate and once again a delivery matrix of active travel support should be factored into the delivery of any new parking schemes.			

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Stride Treglown on behalf of Coventry University (ID61)	AC3.5: 12.1 5- 12.2 8	Y	Y	Y	Y	There has been much speculation about how a mobility credit system would work. The University Group is supportive of this measure however, there is much more work that needs to be done in order to deliver a successful approach. The changing nature of business operations would mean that a significant amount of resources and time would need to be dedicated to managing a mobility credit scheme. Until such time as greater certainty has been achieved, the University Group consider that this section of the Policy should be removed and therefore objects to the current wording on grounds that no clear alternative mechanism is currently in place.	Until such time as greater certainty has been achieved, the University Group consider that this section of the Policy should be removed and therefore objects to the current wording on grounds that no clear alternative mechanism is currently in place. This representation is in the interests of supporting a positive, justified, effective and deliverable plan.	The policy is worded to encourage sustainable travel and is considered to be proportionate as the Council only requires developers to fund the credit not administer it. The Council or TfWM will administer it.	Amend part 5 to replace the word “provision” with “fund” to make it clear how the Council intends mobility credits to be implemented by applicants.

Policy AC4 - Active Transport Provision including Walking, Cycling and Micro Mobility

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined Authority (ID67)	AC4.1a	Y	Y	Y	N	N/A	Policy AC4 1a support for safe, comfortable, and convenient walking and cycling routes is welcomed, but the wording could also include attractive, direct, and cohesive in line with WRAT and CloS tools.	Additional wording is not objected to in principle.	Part 1a to be amended to replace “pedestrian desire lines” with “routes to be direct and desirable”.
Transport for West Midlands - West Midlands Combined Authority (ID67)	AC4	Y	Y	Y	N	N/A	Policy AC4 support for repurposing streets towards active travel is welcomed (e.g. School Streets and traffic calming). Will this include reductions in carriageway widths and lanes to ensure pedestrian	Specific references were removed as national guidance may change and this approach provides resilience. Referring to national guidance	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							and cycle routes meet the desirable minimum widths in LTN 1/20?	would include initiatives like carriageway widths.	
Turley on behalf of the University of Warwick (ID68)	AC4	Y	Y	Y		Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility It is welcomed that the wording in Policy AC4 has been strengthened to better reflect the higher priority which the Council is placing on promoting walking and cycling as well as reference to development proposals coming forward in accordance with the emerging Local Cycling and Walking Infrastructure Plan (LCWIP). The University supports the further detail to cycle parking standards to include other forms of parking for cargo bikes and children's bikes as well as complimentary facilities such as showers and changing facilities is welcomed.	N/A	Comments are noted. The policy incorporates the principles that underpins low traffic neighbourhoods and communities having reduced active travel time to amenities and is considered robust. The council already monitors the take up of active travel at a strategic level, but site by site monitoring could	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Active travel uptake over the lifetime of this plan period should be monitored through studying existing and future local travel patterns and community engagement. Through positive placemaking principles, communities should have access to day-to-day services and amenities within a 20-minute active travel journey, placing emphasis on reduced car use and low traffic neighbourhoods		be a requirement of a travel plan that would be considered under the DM process.	
Tyler Parkes on behalf of PCCWM (ID69)	AC4	Y	Y	N	Y	The PCCWM made representations to the Regulation 18 consultation with regard to Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility. The PCCWM agrees that the Council should encourage sustainable means of transport and supports policies to provide sustainable alternatives to the use of private cars and promoting public transport. However, the PCCWM requested that the changes to this policy should explicitly reference the need for measures to ensure the safe travel of passengers and pedestrians.	For the reasons set out in his original representation, the PCCWM considers that Policy AC4 should be amended to include the following additional sub-paragraph: 4. Development proposals should not negatively impact the safe travel of passengers and pedestrians	Policy AC4 requires walking and cycling routes to be safe, however once passengers are on public transport this is outside of planning's remit.	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Safety is considered to be a key driver facilitating sustainable forms of travel. Again, the Consultation Statement does not acknowledge this representation, and it is disappointing that specific reference to the need for measures to ensure the safe travel of passengers and pedestrians has not been included in the reasoned justification or the policy. The PCCWM therefore OBJECTS to the omission of reference to the need for measures to ensure the safe travel of passengers and pedestrians under the above policy.			
Stride Treglown on behalf of Coventry University (ID61)	12.2 9-12.3 8	Y	Y	N	Y	New forms of micro-mobility provide some risks but also huge opportunities for the city to decarbonise. The University Group objects to the current drafting of the policy on the grounds that the title refers to Mico Mobility, however no mention of e-scooters / e-bikes is referenced in the provisions of the policy.	The University Group objects to the current drafting of the policy on the grounds that the title refers to Mico Mobility, however no mention of e-scooters / e-bikes is referenced in the provisions of the policy.	The policy has been developed with Highways colleagues, where it was considered appropriate given micro mobility is emerging and is	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						The University Group is at the forefront of transport design and there are ongoing and emerging projects which could be mutually beneficial to define the policy guidance. There should be consideration given to how e-bikes and e-scooters can be accommodated safely in the city and how charging facilities for these can be provided communally in a fire-safe space. Reference to standing advice from Active Travel England (created since the adoption of the last Local Plan) is also considered worthy of inclusion within the Plan. The University Group continues to support active and sustainable travel as viable commuting methods for students and staff. In order to support a “pedestrian and cycling first” approach one has also to consider wider vehicle traffic re-routing, paid for by urban living residential schemes. The introduction of mobility hubs and the careful consideration of public realm design to	This representation is in the interests of supporting a positive, justified, effective and deliverable plan. The representation also acknowledges the role of ongoing collaboration between the University, City Council and transport partners to deliver a coherent accessible infrastructure within the City Centre and beyond.	addressed with the active travel measures. Reference e- bikes in policy AC7, freight. Specific references were removed as national guidance may change and this approach provides resilience. The Council welcomes collaboration with the university to share best practice and initiatives. The policy is concerned with cycle routes over the whole city	

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						improve legible cities and wayfinding remains a key priority of the University's Public Realm Design Guide (and an aspect which will be captured in a University Campus Masterplan under new policy CC2). The University Group also requests more details on plans for providing dedicated cycle routes through the city centre. While much work has been done to pedestrianise areas of the city centre there are no clear cycle routes provided for cyclists once they reach the edge of the ring road. It is recommended that consideration is given to including the city centre in the changes to this policy.		and therefore includes the city centre.	
Natural England (ID37)	AC4					Natural England supports... Active Transport Provision Walking and Cycling 12.29 The Council is placing a high priority on promoting walking and cycling (as reflected in the Coventry Transport Strategy) to help reduce road traffic congestion and carbon and air pollution, but also to improve the physical and mental health of residents.		Comments are noted.	No change

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						Perhaps the most significant advantages which are offered by these active travel modes are the physical and mental health benefits. Natural England strongly supports Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility			
WWT (ID71)	All		N	N	N	WWT also reiterates our previous comment that in terms of Policy AC4 and the 'Active Transport Provision' section and cycle paths, the plan needs to ensure it is balancing wildlife and cycling. As there are important habitats and trees in these locations and along waterways, where recreation can have a real impact on local habitats.	Policy AC4 and the 'Active Transport Provision' section and cycle paths, the plan needs to ensure it is balancing wildlife as well as cycling. As there are important habitats and trees in these locations and along waterways, where recreation can have a real impact on local habitats. We have received a lot of recent complaint from our Members regarding habitats	The plan review has assessed sites and considers the selection to be appropriate	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
							clearance for these cycle paths. Full tree surveys and ecological surveys need to be carried out before work takes place.		

Policy AC5 -Bus, Demand Response Transit and Rapid Transit

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined Authority (ID67)	AC5	Y	Y	Y	N	N/A	Policy AC5 makes a small reference to mobility hubs – this should be expanded with a clear definition in the glossary and included within walking and cycling proposals.	Comments are noted and providing a definition of mobility hubs could be a modification.	Add a definition for mobility hubs into the glossary.
Turley on behalf of the University of Warwick (ID68)	AC5	Y	Y	Y		The University welcomes the inclusion of Very Light Rail as part of Policy AC5 as well as the need for demand responsive transit to offer improved accessibility. The use of public transport as part of an integrated shared mobility service to allow a seamless and cohesive system of travel for all types of users is promoted within Policy AC5 and through the development of Mobility Hubs. This is supported by the University and aligns with the recently adopted University Masterplan SPD.	N/A	Comments are noted.	No change

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Tyler Parkes on behalf of PCCWM (ID69)	AC5	Y	Y	N	Y	The PCCWM made representations to the Regulation 18 consultation with regard to Policy AC5: Bus, Demand Response Transit and Rapid Transit. The PCCWM agrees that the Council should encourage sustainable means of transport and supports policies to provide sustainable alternatives to the use of private cars and promoting public transport. However, the PCCWM requested that the changes to this policy should explicitly reference the need for measures to ensure the safe travel of passengers and pedestrians. Safety is considered to be a key driver facilitating sustainable forms of travel. Again, the Consultation Statement does not acknowledge this representation, and it is disappointing that specific reference to the need for measures to ensure the safe travel of passengers and pedestrians has not been included in the reasoned justification or the policy. The PCCWM therefore OBJECTS to the omission of reference to the need for measures to ensure the safe travel of passengers and pedestrians under the above policy.	For the reasons set out in his original representation, the PCCWM considers that Policy AC5 should be amended to include the following amendment to subparagraph 1: 1. New major development proposals should have safe and convenient access to the existing bus network, comply with the TfWM access standards and include measures to ensure the safe travel of passengers and pedestrians. In areas where this is not achieved,...	Policy AC4 requires walking and cycling routes to be safe, however once passengers are on public transport this is outside of planning's remit.	No change
Stride Treglown	12.39-	Y	Y	Y	Y	The University Group enrolls a high number of international students, which presents cultural	This representation is in the interests of supporting a	The council would welcome	No change

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on behalf of Coventry University (ID61)	12.48					challenges in relation to the patronage of public transport. This is an issue the University Group is acutely aware of and is putting in place measures to encourage take-up as a viable, safe and reliable of transit around the City and between destinations linked to the university Campus. The University Group will share the results of staff and student surveys at the appropriate time to help promote integrated measures to support active travel and help inform the underlying evidence base in support of Local Plan policy. The University Group also welcomes the proposals of the VLR scheme and would like to work collaboratively on this scheme to ensure that the proposed routes for the VLR connect residential areas with key areas of employment in the city. The University Group acknowledges that the VLR scheme is unique and has the potential to support a significant reduction in car trips in Coventry should it be delivered effectively.	positive, justified, effective and deliverable plan. The representation also acknowledges the role of ongoing collaboration between the University, City Council and transport partners to deliver a coherent accessible infrastructure within the City Centre and beyond. Sharing knowledge between the parties will also help to inform an ongoing evidence base to justify refinements to the policy landscape.	seeing the results of the staff and student surveys and will work collaboratively with the university on improving links and reliable transit around the city.	

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Warwick District Council and Stratford District Council (ID70)						Bus, Demand Responsive Transit and Rapid Transit Paragraph 12.47 of the consultation refers to the priority routes for the provision of high-quality Rapid Transit and the preceding paragraph, 12.46, states that the council's preferred way to deliver rapid transit is the Very Light Rail system.	As confirmed at a NokSoC Board Meeting on 4th February 2025 following a public statement made by the relevant City Council Portfolio Holder, the council is currently considering a route out to the Coventry & Warwick Gigapark (West Midlands Investment Zone) as the first main route for Very Light Rail. We would like to see specific reference to the Gigapark in the Local Plan as an extension to reference to the adjacent Whitley Business Park.	The policy supports the delivery of rapid transit in the city, and is wording considered sufficient within the remit of policy AC5.	No change

Policy AC6 - Rail

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
CBRE on behalf of Network Rail (ID7)	AC6	Y	Y	N	N	Policy AC6 – Rail (pp125 – 127) Policy AC6 lists the following rail-related proposals which will be supported: • Improved access to rail stations, including HS2, by all modes of travel; • Improved interchange facilities between rail and other modes; and • Enhancements on the rail network which increase the frequency and quality of rail services which serve Coventry. It also identifies the electrification of the rail network, on the Coventry north-south corridor between Leamington, Kenilworth, Coventry, Bedworth and Nuneaton and on routes to Leicestershire and the East Midlands. Policy AC6 also supports proposals for additional local railway stations on the east-west and north/south rail corridor within Coventry where they are proven to be viable, support growth objectives and are consistent with national, regional or local rail strategies. It additionally identifies HS2 and the West Coast Main Line developments which provide opportunities for sub-regional growth to support services provided by these rail projects. Furthermore,	For the reasons explained previously, to ensure that the Plan is sound, including by being justified based on proportionate evidence, and effective in terms of dealing with strategic matters, Network Rail requests that reference to the West Midlands Strategic Advice 2022 and relevant emerging local studies is made in Criterion 2 of the draft Policy AC6, to be read alongside the West Midlands Rail Executive Rail Investment Strategy and Midland Connect Strategic Transport Plan currently listed in this	Reference to additional guidance is not objected to and could be a modification. The measures to facilitate improved rail services in point 2 is not exhaustive and the policy does not preclude other rail initiatives being	Potentially change point 2 to include reference to the West Midlands Strategic Advice 2022 and relevant emerging local studies. Also amend point 2 to include a caveat that says priorities may change in the future and

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						Appendix 7 of the Infrastructure Delivery Plan ("IDP"), which is referenced in other Plan policies, such as Policy IM1, sets out the key currently planned transport projects that will improve transport connectivity within Coventry to support growth, identifying: • Coventry Very Light Rail ('CVLR') demonstration project - development of a short section of short section of track between Coventry Railway Station and Pool Meadow Bus Station to allow CVLR vehicles to be tested in a live environment. • CVLR route 1 – A first CVLR route, connecting Coventry Railway Station to University Hospital. • Further CVLR routes – Development of a further network of CVLR Routes serving various key locations across the city. • Tile Hill Station improvement - Station improvements aimed at establishing Tile Hill as a transport interchange/Park & Ride site, serving the West side of the city • New direct connections to East Midlands - Establishing a direct rail connection between Coventry, Leicester and Nottingham.	criterion. It should also be noted that the list of key transport priorities and projects is not exhaustive and other opportunities could arise. So that the draft Plan is justified and effective, it should be referenced in the Plan that due to the changing landscape of the rail network (with HS2 being a good example of an ongoing variable), the projects listed may be subject to change in the future and other priorities may also arise over the Plan period. For example, the Coventry to Birmingham New Street rail corridor could emerge as a key potential transport project as the future of HS2 and the	supported by the policy. In regard to VLR, this is reference as rapid transit and is supported in policy AC5.	therefore the list of initiatives is not exhaustive.

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						• More frequent service to Leamington, Kenilworth and Nuneaton - Improvements, including at Coventry Station and some double tracking of the line between Coventry and Leamington, to enable an increased service of two trains per hour. • Potential further new railway stations - Potential further new railway stations at Binley & Willenhall, Coundon, Coventry South and/or Foleshill (further work is required to determine whether some, or all, of these stations would be viable). Network Rail supports the identification of key rail projects in the draft Plan and IDP. For the reasons explained previously, to ensure that the Plan is sound, including by being justified based on proportionate evidence, and effective in terms of dealing with strategic matters, Network Rail requests that reference to the West Midlands Strategic Advice 2022 and relevant emerging local studies is made in Criterion 2 of the draft Policy AC6, to be read alongside the West Midlands Rail Executive Rail Investment Strategy and Midland Connect Strategic Transport Plan currently listed in this criterion. It should also be noted that the list of key transport priorities and projects is not exhaustive and other opportunities could arise. So that the draft Plan is	rail needs of the West Midlands become clearer.		

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						justified and effective, it should be referenced in the Plan that due to the changing landscape of the rail network (with HS2 being a good example of an ongoing variable), the projects listed may be subject to change in the future and other priorities may also arise over the Plan period. For example, the Coventry to Birmingham New Street rail corridor could emerge as a key potential transport project as the future of HS2 and the rail needs of the West Midlands become clearer. Officer comment: See full representation for additional information			
Turley on behalf of the University of Warwick (ID68)	AC 6	Y	Y	Y		Policy AC6: Rail The University supports Policy AC6 and the Council's ambition to improve the city's rail connectivity and at a strategic level, supports a new station on the Coventry-Kenilworth-Leamington line. At a local level the University supports the inclusion within Policy AC6 to ensure better access to stations and rail interchanges is provided to support sustainable first- and last-mile journeys and onward connectivity. The University would particularly support these improvements at Tile Hill and Canley stations.	N/A	Comments are noted.	No change

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Tyler Parkes on behalf of PCCWM (ID69)	AC 6	Y	Y	N	Y	The PCCWM made representations to the Regulation 18 consultation with regard to Policy AC6: Rail. The PCCWM agrees that the Council should encourage sustainable means of transport and supports policies to provide sustainable alternatives to the use of private cars and promoting public transport. However, the PCCWM requested that the changes to this policy should explicitly reference the need for measures to ensure the safe travel of passengers and pedestrians. Safety is considered to be a key driver facilitating sustainable forms of travel. Again, the Consultation Statement does not acknowledge this representation, and it is disappointing that specific reference to the need for measures to ensure the safe travel of passengers and pedestrians has not been included in the reasoned justification or the policy. The PCCWM therefore OBJECTS to the omission of reference to the need for measures to ensure the safe travel of passengers and pedestrians under the above policy.	For the reasons set out in his original representation, the PCCWM considers that Policy AC5 should be amended to include the following amendment to subparagraph 1: 1. Proposals which improve the quality of local rail services, the safe travel of passengers and pedestrians and access to stations and rail interchange facilities will be supported. These include:...	Incorporating 'safe' when taking about access to stations could be a modification, however once passengers are on public transport this is outside of planning's remit.	Amend point 1 to include the wording "safe and convenient access to stations"
Stride Treglown on	12.49-	Y	Y	Y	Y	The University Group supports the upgrade of Policy AC6 as set out in the Reg 19 Submission Draft. Rail accounts for an important modal share of staff and students who	This representation supports the policy ambition of the	Comments are noted.	No change

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behalf of Coventry University (ID61)	12.54					attend university. Prior to the pandemic, there were significant proposals to improve rail connectivity to Coventry, namely to Leicester etc. via Nuneaton. The University Group can see such improvements creating new employment corridors for travel. These improvements would see an overall reduction in car trips in and around Coventry and support the wider carbon reduction strategy which is set out within this policy document.	Council in improving public transport infrastructure.		

Policy AC7 - Freight

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Turley on behalf of the University of Warwick (ID68)	AC 7	Y	Y	Y		Policy AC7: Freight The University welcomes the strengthening of Policy AC7 to include the following suggested changes made by the University at Reg 18 consultation. This includes: • The requirement for developments with 24-hour operations to provide overnight parking and facilities (such as toilets and showers), to reduce HGVs parking overnight on roadsides. • The requirement for new developments to demonstrate that they can function without requiring HGVs to travel on smaller, residential roads. • Development of Freight Consolidation Centres, in appropriate edge of city locations close to the strategic road network, to reduce volumes of HGV/LGV traffic within the city. • The requirement for new developments to produce a Delivery and Servicing Plan to support applications. • The encouragement of sustainable and new forms of delivery technology, such as cargo bikes, autonomous delivery methods and emerging technologies.	N/A	Comments are noted.	No change
Joscelyne	AC 7	N	N	N	N	B8 tends to be located close to the administrative boundary of the City, near the strategic road network (SRN) particularly at junctions such as the	Include references	Many of the points raised are	No change

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respon dent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Bigha m(ID2 3)	and par as 12. 55- 12. 58					M6 J2 and M6 J3 and along public transport routes associated with deprived areas (where levels of car ownership are lower). Currently, these policies do not address the cumulative cross-boundary effects on traffic levels and air quality within areas such as Longford and Foleshill. The effects of B8 sites located within other administrative areas also need to be considered. For example, strategic sites surrounding M6 J3 and further along the A444 at the Griff Island Nuneaton. There are West Midlands Combined Authority (WMCA) funded infrastructure projects in the pipeline such as the Keresley Link Road and the Coventry North Package (M6 J3 improvements) which are being led by CCC. Yet, these do not appear to be referenced. Should the delivery of B8 be timed to link with these projects? What happens to traffic levels along the B4113 and A444 if these projects are delayed, cut back or cancelled? Yet, the following is stated elsewhere within the Regulation 19 Proposed Submission, '12.5 Public health is also a key consideration. A citywide Air Quality Management Area (AQMA) was declared in Coventry in 2009 due to significantly high levels of air quality emissions. Research demonstrates that emissions from road transport are the principal source of elevated concentrations of Nitrogen Dioxide (NO2) which causes poor air quality. The main transport corridors to the North and North East of Coventry	to the WMSESS threshold (25ha) and technical strategic site criteria. Use specific and measurable requiremen ts rather than the phrase 'would not result in significant harm' which is difficult to define and open to	site / area specific and go beyond the scope of Policy AC7. The policy is considered to be fully justified and will ensure proposals are assessed in full accordance with the council's transport priorities. This includes cross- boundary applications that the council are consulted on by neighbouring authorities.	

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						(linked to the M6) are identified as being most likely to exceed the NO2 standard.' It is important that policies are cross-referenced to ensure that there is a consistent approach and that delivery on key issues, such as air quality, is not undermined. What measures will be put into place to prevent increases in HGV movements along the B4113 and its side roads such as Windmill Road? How are school walk routes being considered in terms of air quality and road safety? Is there a priority route network for HGVs within Coventry and Warwickshire? Should more weight limit restrictions be introduced? Should APNR be used to enforce weight limit restrictions and prevent issues such as bridge strikes? A recent NBBC Strategic Transport Assessment referred to 'peak spreading' in response to congestion, '3.60 The purpose of peak spreading the growth demand is to replicate the retiming of trip departure times based on the projections of historic count data which provides evidence for the shifting of traffic into the shoulder hours when the network is particularly congested.'	interpretation.	Reading the plan as a whole means in addition to highway impacts, impacts such as air quality dealt with in the EM policies of the Local Plan can be assessed with input from the council's Environmental Protection team. Certain strategic infrastructure is referred to in Policy DS4 (such as the Keresley link road in part C) and any infrastructure	

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						Is increasing travel to work times sustainable? What impact does this have on other businesses? What are the implications for health and wellbeing? What are the impacts for those living in areas where peak levels of traffic are extended into the 'shoulder hours'? What about those working in jobs that don't offer flexitime or options to work at home? Will they need to pay extra childcare costs? The policy also needs to ensure that job opportunities for residents in deprived wards are not limited to B8 by a lack of connection to other forms of employment within Coventry & Warwickshire through public transport. The planned closure of the Hello Fresh site in Nuneaton illustrates why overreliance on one sector can increase levels of risk to the local economy. If poor public transport links (and costs) limit the opportunity to work in other sectors, the impacts of such closures will have the greatest effect on deprived wards. Currently, bus services within Coventry do not cover our 'travel to work areas' (TTWAs) well as many of these fall within Warwickshire. This is in part due to our older industrial sites (brownfield) being used for housing developments since the 1980's. Over the same period, there had been a reduction in employers providing their own subsidised services. Currently, transport appears to be focused on destinations such as the City Centre and University Hospital Coventry as hubs. Although these are important,		required to make an application acceptable will be secured through the DM process or through the strategic DS policies in the local plan. Policy AC7 has been strengthened to try and reduce HGV movements in the city, which accords with the jobs and economy policies of the Local Plan that encourage B8 uses to be located towards	

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						many workplaces (Ansty Business Park, MIRA Tech Page 10 of 19 Park, Spa Park, Warwick Innovation Centre, Squab Workspace, Prologis Rugby Central Park, Bermuda Park, etc) are based on the outskirts of the City often outside its (and WMCA's) administrative boundary. Although, Warwickshire County Council and many of the district/borough councils are associate members of WMCA this does not appear to be extended to public transport arrangements. This creates issues in terms of access to employment opportunities for those who do not own cars. The cost of buying separate bus tickets/passes to cover the different operators when crossing over an administrative boundary is prohibitive. For example, as soon as you go under the railway bridge CNN/25 Bedworth Road (A444) into Warwickshire, a WMCA bus pass cannot be used. This leads to inconvenience and longer journey times because customers cannot use all of the services running along a particular route. Poor public transport links across Coventry & Warwickshire also increase the levels of through traffic on roads such as the B4113 (Bedworth Road–Longford Road–Foleshill Road) making bus journeys even longer during peak hours. The following is stated elsewhere within the Regulation 19 Proposed Submission, ‘12.39 Buses offer a realistic modal choice for many local trips, and particularly those into the city centre. Bus network coverage across the city		the main arterial roads around the city. Chapter 12 seeks for bus routes to better link areas of the city as well as with neighbouring authority areas, and with employment areas, and which reduces the need to change buses in the city centre. In addition to this Policy AC1 supports the use of services like the WM demand	

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						is generally good although there are some examples of where service frequencies are inadequate to provide an attractive and realistic option, such as more peripheral edge of town employment sites.' '12.42 The existing bus network primarily follows the radial network of roads across the city, and whilst this supports good access to the city centre, it does not necessarily support the demand for orbital trips such as those between residential and edge of town employment sites. More recently operators have introduced orbital services which have helped to address this issue. The West Midlands Strategic Transport Plan sets out a strategy for a core bus network which is closely integrated with a high frequency rail and rapid transit network to enhance connectivity to other strategic centres across the West Midlands.' It is important that policies are cross-referenced to ensure that there is a consistent approach and that delivery on key issues is not undermined. For example, although the issue of access to edge of town employment sites is outlined in the section on 'Active Transport Provision', the policies do not effectively address cross-boundary issues such as access to Coventry's TTWAs within Warwickshire. The policy also states, '...proposals for such development will also need to demonstrate that they would not result in significant harm to the amenities of persons occupying nearby residential property...' How is 'significant harm' defined? Would it not be better to have specific guidelines for B8 regarding nearby residential properties?		bus service which S106 agreements currently secure funding for. Regarding the use of the term 'significant harm', this wording is common in planning policy to provide flexibility and for the planning balance judgement to be made with each proposal determined on its own merits with input from departments like Environmental	

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						Why not specify heights and distances with inner and outer zones? Why not require artificial lighting impact assessments? Why not include protections such as requiring loading bays, parking areas and fixed plant to be located away from sensitive receptors? Why not require the use of landscaped buffers and acoustic bunds? At what point should proposals include pick-up and drop-off points for employees, a bus terminus, cycle ways/facilities, overnight parking facilities for HGVs and a separate access road for emergency vehicles? In the long run, outlining requirements within a policy/SPD would benefit developers as well as protecting residents by streamlining the planning process later on. Within the West Midlands Strategic Employment Sites Study 2023/24 Final Report (WMSESS) it states, ‘3.42...More thought to be given to the design of sites close to existing residential developments or where a residential development is likely to take place in the future.’ ‘6.2 Both the West Midlands Strategic Employment Site 2015 and 2021 studies and definitions in West Midlands Regional Spatial Strategy...confirmed that 25 ha remains a relevant threshold for strategic sites in most instances.’		Protect and Highways. The policy wouldn't list out possible mitigation and protection measures, however, these can be requested through the DM process when seeking to make a development acceptable when it otherwise wouldn't be. The policy seeks to encourage businesses to promote	

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						'11.14...The 25 ha / 60 acre threshold was considered the typical minimum to generate sufficient value to support the delivery of enabling infrastructure.' '...Preferred plot ratios being a minimum of 0.3516...ideally sites would be a minimum of 25ha and readily over 50ha which takes into account the landscaping and infrastructure involved in delivering sites of this scale as well as inclusion of smaller employment units where appropriate.' 'Is located away from incompatible land-uses (including residential) and has the ability to undertake 24/7 unrestricted operating hours and manage noise/lighting expectations.' 'The ability to deliver high-bay warehousing at least 20m height (recognising the landscape impacts and need for appropriate locations and / or mitigation).' Should references be made to the WMSESS threshold (25ha) and technical strategic site criteria within this policy? Is a plot ratio used to calculate the maximum floorspace to ensure that a site remains sustainable and delivers the appropriate level of landscaping and infrastructure? When allocating/assessing sites are constraints such as PROWs, National Grid infrastructure (pylons and wayleaves), water distribution mains and		sustainable forms of travel and specific active travel initiatives are supported in policy AC4. Policy AC2 seeks to ensure proposals do not negatively impact the capacity and/or safety of the highway network. When applications are assessed, they are based on current road capacity. Reference to the WMSESS strategic	

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						buffers for hedgerows, trees, watercourses and local wildlife sites identified early on? Are these accounted for within calculations of maximum floorspace?		site threshold and the plot ratio used to calculate maximum floorspace is in the jobs and economy policies of the local plan and in the Employment background paper.	

Overarching comments (non-policy)

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined Authority (ID67)	12.36	Y	Y	Y	N		Section 12.3.6 (pg. 120) references Manual for Streets for determining cycling infrastructure based on traffic levels and speeds. It would be beneficial to also reference LTN 1/20 to ensure infrastructure meets safe and inclusive standards.	Specific references were removed as national guidance may change and this approach provides resilience.	No change
Transport for West Midlands - West Midlands Combined	12.36	Y	Y	Y	N		Section 12.3.6 mentions the inclusion of Advanced Stop Lines (ASLs) for cycling. While ASLs are welcomed, they are unlikely to be sufficient on their own to encourage most people to cycle through major junctions.	Comments and noted and not disputed and is why policy also supports other measures.	No change

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Authorit y (ID67)									
Transpo rt for West Midland s - West Midland Combin ed Authorit y (ID67)	12. 37	Y	Y	Y	N	N/A	Section 12.3.7 support for pedestrian improvements is welcomed. The inclusion of Pedestrian Comfort Levels could help determine appropriate treatments and additional measures.	The policy has been developed with the Council's Highways department and is considered robust and in accordance with the Council's Transport Strategy.	No change
Turley on behalf of the Universi ty of Warwic k (ID68)	Cha pte r 12	Y	Y	Y		The University is supportive of Chapter 12: Accessibility and is pleased to acknowledge that the majority of consultation comments raised by the University during the Reg 18 consultation have been considered and incorporated into the Reg 19 version. The University particularly supports the strengthening of the hierarchical prioritisation of transport infrastructure, leading with active and sustainable transport as the primary focus for investment and key driver for travel behaviour change.	N/A	Comments noted.	No change

Chapter 13 – Environmental Management

Policy EM1 - Planning for Climate Change Adaptation

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
West Midlands Resource Technical Advisory Body (WMRTAB) (ID73)	EM 1	n/a	n/a	n/a	N	WMRTAB notes and broadly welcomes policy in the Coventry Local Plan which encourages developers to consider the potential for energy from waste to be utilised in meeting energy requirements (Policy EM1).	N/A.	Duly noted.	N/A

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Turley on behalf of the University of Warwick (ID68)	EM1	Y	Y	N	Y	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 “<i>the need to address embodied carbon and waste</i>” without a great deal of supporting guidance. Embodied carbon is often split into sub-categories (up-front, in use and	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	CCC accept that further guidance could be beneficial in terms of providing further explanation of how such calculations can be provided. Notwithstanding, the evidence is clear as set out in the Carbon Policy Report (2024) and the Viability report (2024) which evidences the need to ensure development meets net zero (regulated operational carbon) for residential and non-residential including embodied carbon and waste in the Coventry context.	Add an additional sentence to Policy EM1 (H) to read: A Supplementary Planning Document (SPD) or future national equivalent will provide further guidance in this regard’.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						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 X X X EM1 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			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						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			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						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).			
Home Builders Federation (ID21)	EM 1	N	N	N	Y	The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy HBF acknowledges that Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 outlines that development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. The NPPF looks for all plans to take a proactive approach to mitigating and adapting to climate change. However, PPG refers to the Planning and Energy	Respondent comment 'Please refer to representation'.	The evidence is clear as set out in the Carbon Policy Report (2024) and the Viability report (2024) and the Water Cycle Study 2024 which evidences the ability to set specific water efficiency target in the Coventry context. Moreover, the Housing PPG – Optional Technical Standards states <i>'all new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres /person /day). Where there is a clear local need, Local Planning Authorities can set out Local</i>	No change.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Act 2008, the Deregulation Act 2015, and the Written Ministerial Statement (March 2015) and states that policies in relation to energy performance standards should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes. The policy seeks to require all development to achieve a water efficiency target of 100l/pd to be achieved using a fittings-based approach. The impact of this requirement along with others in this Plan may have considerable viability implication and may lead to the non-delivery homes and needs to be fully considered within the Viability Assessment.		<i>Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day'.</i> Given the Council has produced a whole plan viability assessment which considered all policies, including EM1, the Council maintain that setting a target of 100 litres p/d is reasonable and justified.	

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						The current Part G Building Regulations require 125 litres per day, and house builders are frequently delivering 115-110 litres per day which means the house building industry is already improving upon the regulations. There are however issues of getting down to 100 litres per dwelling and below, where customer experience starts to get affected at 100 litres per dwelling and below. Furthermore, there are examples of schemes around the country where once water usage begins to get too low there becomes a secondary issue of odour, air quality and human health as the piped systems aren't getting enough volume to run through and cleanse the system. Pipes need a certain volume of water to flush everything through, otherwise if the effluent is not getting cleared and if 'solids and matter' are just sitting dry in pipes			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						this can cause air quality issues and nuisance to residents. HBF would strongly question if a policy limiting water use beyond Building Regulations and the emerging Future Homes Standard is deliverable, or indeed desirable, and suggest this requirement should be removed. Building Regulations already address this issue, there is no need for further policy in the Local Plan on this matter.			
Savills on behalf of Bellway Homes and Merton College (ID52)	EM1	N	Y	N	Y	Policies EM1, EM11, EM12 and EM14 The Written Ministerial Statement for Local Energy Efficiency Standards (December 2023) 4.45. It is important to ensure that all of the below policies are implemented in accordance with the Written Ministerial Statement (2023) which states: <i>“The improvement in standards already in force, alongside the ones which are due in 2025,</i>	Respondent comment ‘Please refer to representation’	CCC accept that further guidance could be beneficial in terms of providing further explanation of how such calculations can be provided. Notwithstanding, the evidence is clear as set out in the Carbon Policy Report (2024) and the Viability report (2024) which evidences the need to	Add an additional sentence to Policy EM1 (H) to read: A Supplementary Planning Document (SPD) or future national

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						<i>demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations."</i> Policy EM1: Planning for Climate Change Adaptation 4.46. Part (h) of the policy requires developments to meet net zero (regulated operational carbon) for residential and non-residential development, including the need to address embodied carbon and waste. Firstly, it is requested that this policy is updated to provide further detail on the net zero definition for regulated operational carbon. 4.47. Additionally, is requested that this policy wording is updated to provide more detail on		ensure development meets net zero (regulated operational carbon) for residential and non-residential including embodied carbon and waste in the Coventry context.	equivalent will provide further guidance in this regard'.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						how to address embodied carbon and waste.			
Stride Treglown on behalf of Coventry University (ID61)	13.1-13.10	Y	Y	Y	Y	The University Group has developed a Public Realm Design Guide which includes reference to the introduction of Sustainable Urban Drainage approaches within public realm interventions. The University Group is supportive of the general policy approach captured in Policy GE1 (part 5) and EM4 (Part 10) in relation to the principle of de-culverting existing watercourses within the City Centre, notably Fairfax Street which provides a defined opportunity. Developing an integrated Green and Blue Infrastructure Strategy and Traffic Re-routing Strategy within (parts of) the City Centre as a precursor to subsequent Masterplanning exercises would appear prudent. The University Group supports the concept of community heat networks	This representation is in the interests of creating a positive, justified, effective and deliverable plan.	Comments of support duly noted.	N/A

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						and would encourage the planning of such networks to ensure that waste heat from non-domestic buildings is captured and used in the network. Like many other large organisations the university ejects significant amounts of heat from server rooms, catering outlets, laboratories, air-conditioned spaces, and combined heat and power units – this heat should be captured and used in community energy networks. The University Group supports the setting of ambitious standards for buildings going beyond existing Building Regulations for the reason that net zero needs to be achieved before 2050. This justifies that new buildings are designed to achieve net zero without requiring expensive and disruptive retrofit. Standards compliant with those set by Passivhaus are recommended as a			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						minimum. In addition, any new builds should include the ability to generate more energy than is required for their operation to offset the lingering impact of older premises which are incapable of being retrofitted to become carbon negative.			
Catherine Bunker (ID6)						The Green and Blue Infrastructure evidence is out of date, and it is not enough to rely on the Local Nature Recovery Strategy which is at a very early stage.		The evidence base still holds good as the underlying data that underpins green and blue infrastructure is still relevant to the key issues facing Coventry at the current time.	No change.
Natural England (ID37)	EM 1					We are pleased to see that Coventry's local plan incorporates planning for climate change and adaptation as outlined within: STRATEGIC POLICY Policy EM1: Planning for Climate Change Adaptation		Comment of support duly noted.	N/A

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Stride Treglown on behalf of Coventry University (ID61)	13.11-13.15	Y	Y	Y	Y	The University Group is supportive of the general policy approach captured in Policy GE1 (part 5) and Policy EM4 (Part 10) in relation to the principle of de-culverting existing watercourses along Fairfax Street. Fairfax Street presents a number of key opportunities to deliver alternative traffic and movement principles. Redevelopment of Council	This representation is in the interests of creating a positive, justified, effective and deliverable plan which recognises cross-referencing to policy objectives within defined areas of the City Centre.	Comments of support duly noted.	N/A.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						owned assets in the area (such as but not limited to part of the Pool Meadow Bus Station as part of a Northern Regeneration Scheme alongside Homes England funding) is also likely to form part of the transformation of this part of the City Centre. A comprehensive masterplan for this area, which aligns with the University Group's ambition for its Cathedral			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Quarter area, and which supports urban living and higher residential densities would be supported in principle. Developing an integrated Green and Blue Infrastructure Strategy and Traffic Re-routing Strategy within (parts of) the City Centre as a precursor to subsequent Masterplanning exercises would appear prudent. Fairfax Street			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						presents an opportunity to open the River Sherborne as part of a positive plan for change in the immediate area. Such an intervention is expected to be funded by the Council, as highway authority and in the interests of meeting numerous City Centre and Environmental policy objectives.			

Policy EM4 - Flood Risk Management

Natural England (ID37)	EM4					With additional support for: <u>Policy EM4 Flood Risk Management</u> 1. All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage and exploring areas for natural flood management. 10. Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should also be given to removing water bodies from culverts wherever possible and viable. This will be of particular importance along Fairfax Street and will be vital to create multi-functional green and blue spaces within the city centre.			
Environment Agency(ID15)	EM4					With reference to our previous comments, we previously advised minor amendments to the wording of Policy EM4 Flood Risk Management.	With reference to our previous comments, we previously advised minor amendments to the wording of Policy EM4 Flood	Agreed.	Reword said sections as stated.

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							Risk Management. We are pleased to see some of these suggestions have been included but the following suggestions remain: Section 1 c. could be reworded as follows: <i>“it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity. An assessment of the ability of development to provide additional flood storage capacity and improve flow paths must be undertaken”</i> Section 1 d. refers to ‘land not at high		

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							risk'. To avoid confusion over what is meant by this, your Council may wish to replace this with <i>"land outside of the 1 in 100 year plus climate change flood event based on an assessment of hazard risk (see DEFRA Hazard rating)"</i>. This approach is in accordance with Section 8.1.3 and 8.1.4 of the 2017 Level 1 SFRA With regards to section 2 c., you might wish to seek an assessment of what betterment is possible on sites, the policy wording could be reworded as follows <i>"All development must undertake an assessment and</i>		

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							<i>implementation plan on what Environmental and Flood Risk Betterment can be provided by the proposals. The assessment should include but not be limited to, River Restoration, enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse and creation of flood alleviation measures". This approach is in accordance with Section 8.1.6 of the 2017 Level 1 SFRA.</i> Section 2 d. refers to watercourse easement. As previously		

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							suggested this section should seek to enhance the easement given to all types of watercourse. In relation to main rivers, in certain areas where local issues dictate, we would encourage that this is extended to 20m. Potential text could state: <i>Unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m (from the top of bank or toe of a flood defence (in certain areas, this may be increased to 20m) of Main Rivers and Ordinary watercourses for maintenance access, the creation</i>		

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						<i>of space for future flood risk management measures and to create habitat corridors. This easement includes existing culverted watercourses. This is required regardless of the extent and location of the floodplain and should be taken into account when considering the developable area."</i> We also note section 2 e. refers to finished floor levels 600mm above the 1 in 1000 year plus climate change flood level. We usually recommend 600mm above the 1 in 100 year plus climate change		

							flood level (design flood level).		

Policy EM5 - Sustainable Drainage Systems (SuDS)

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Home Builders Federation (ID21)	EM5	N	N	N	Y	The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy In order to be justified and effective the plan needs to be clearer on how this policy interacts with mandatory BNG. This is also important to ensure the plan is positively prepared and complies with national guidance on BNG from both DEFRA and MHCLG.	Respondent comment: 'Please refer to representation.'	The Council maintains the policy is compatible with BNG national guidance	No change.
Environment Agency(ID15)						Please note the following comments relate solely to protection of controlled waters. As outlined previously, the majority of the council area is underlain by Sandstone bedrock, designated as a Principal Aquifer. This is the most sensitive aquifer designation as such strata are	As suggested before, your Council may wish to include reference to the protection of controlled waters in the	Agreed.	Add a new para at the end of para 13.19 " The Environment Agency's Approach to Groundwater

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						capable of supporting regionally important groundwater abstractions and support to watercourses. There is also limited superficial cover in these areas, which makes the aquifer more vulnerable to pollution. The city center area does contain End 5 multiple potable groundwater abstractions and is therefore within source protection zones. Based on the above, the local plan area is considered highly sensitive in terms of controlled waters receptors. With reference to our previous comments, we note the Proposed Submission document reflects much of our advice, particularly in the supporting text of Policy EM6 (paragraphs 13.20-13.23). We welcome reference to the Water Framework Directive (WFD) in Policies CC1 Part B and EM6 and the emphasis on Sustainable Drainage Systems (SuDS) in Policy EM5 and the preference for nature-based solutions	context of Sustainable Drainage Systems (SUDS) in Policy EM5. Our comments at the Issues and Options stage detail this further.		Protection (2018) – Position Statement G13 - Sustainable drainage systems: The Government’s expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation. Where infiltration

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						in Policy GE1. WFD reference of course applies to the whole plan area, not just the City Centre.			SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should: • be suitably designed • meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning

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									Practice Guidance • use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater. Where infiltration SuDS are proposed for anything other than clean roof

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									drainage in a Source Protection Zone 1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply”.

Policy EM6 - Redevelopment of Previously Developed Land

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Home Builders Federation (ID21)	EM6	N	N	N	Y	The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy Criteria 5 of this policy requires Development must meet a water efficiency target of 100l/pd using a fittings-based approach. As we explained in our response to policy EM 1 climate change, the impact of this requirement along with others in this Plan may have considerable viability implication and may lead to the non-delivery homes and needs to be fully considered within the Viability Assessment. Current Part G Building Regulations require 125 litres per day, and house builders are frequently	Please refer to representation	The evidence is clear as set out in the Carbon Policy Report (2024) and the Viability report (2024) and most directly, the Water Cycle Study 2024 which evidences the ability to set specific water efficiency target in the Coventry context. Moreover, the Housing PPG – Optional Technical Standards states ‘ <i>all new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres /person /day). Where there is a clear local need, Local Planning Authorities can set out Local Plan policies requiring new dwellings to meet the tighter</i>	No change.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						delivering 115-110 litres per day which means the house building industry is already improving upon the regulations. There are however issues of getting down to 100 litres per dwelling and below, where customer experience starts to get affected at 100 litres per dwelling and below. Furthermore, there are examples of schemes around the country where once water usage begins to get too low there becomes a secondary issue of odour, air quality and human health as the piped systems aren't getting enough volume to run through and cleanse the system. Pipes need a certain volume of water to flush everything through, otherwise if the effluent is not getting cleared and if 'solids and matter' are just sitting dry in pipes this can cause air quality issues and nuisance to residents. HBF would strongly question if a policy limiting water use beyond Building		<i>Building Regulations optional requirement of 110 litres/person/day'.</i> Given the Council has produced a whole plan viability assessment which, considered all policies, including EM6, the Council maintain that setting a target of 100 litres p/d is reasonable and justified.	

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Regulations and the emerging Future Homes Standard is deliverable, or indeed desirable, and suggest this requirement should be removed. Building Regulations already address this issue, there is no need for further policy in the Local Plan on this matter.			
Environment Agency (ID15)						Water Quality and Resources We welcome reference to the Water Framework Directive (WFD) in Policies CC1 Part B and EM6 and the emphasis on Sustainable Drainage Systems (SuDS) in Policy EM5 and the preference for nature-based solutions in Policy GE1. WFD reference of course applies to the whole plan area, not just the City Centre.		Comments of support duly noted.	N/A.

Policy EM7 - Air Quality

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined Authority (ID67)	EM7	Y	Y	Y	N	N/A	Policy EM7 supports low-emission transport but only references electric vehicles and biofuels. Walking and cycling should also be included.	Agreed.	Insert the words 'walking and cycling' to the bracketed sentence in part 1 of the policy.
Home Builders Federation (ID21)	EM7	N	N	N	Y	The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy Criterion 3 of this policy again seeks to make compliance with an SPD a Local Plan policy	Please refer to representation.	Given the SPD was approved post adoption of the 2017 Local Plan, the change	No change.

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						requirement, this time the Air Quality SPD. If the Council wish to provide additional advice on the interpretation of any policy, this should be done through a Supplementary Planning Document, which is prepared and consulted on after the Local Plan policy has been adopted. It cannot be done through trying to give Local Plan policies status to an existing SPD, especially as the existing SPD hangs from the adopted policies in the Local Plan, which will be replaced when this new Local Plan is adopted. Supplementary Planning Documents should by definition be supplementary to the Local Plan.		applied in part 3 reflects the current position and future proofs the policy from becoming out of date, once adopted. It must be emphasised, this a reviewed policy (like all policies in the Plan) and the way the policy is worded reflects the most up to date position in terms of relationship between approved SPD and the need to review Local Plan policy.	

Policy EM8 - Waste Management

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
West Midlands Resource Technical Advisory Body (WMRTAB) (ID73)	EM8	n/a	n/a	n/a	N	WMRTAB is pleased to see that the important matter of waste management has been considered in the Local Plan and includes specific policy EM8 that would be used to determine whether land proposed to be used for waste management is suitably located and potential impacts would be addressed. WMRTAB notes and broadly welcomes this policy which prioritises waste prevention, reuse, recycling, and recovery	The Plan should set out whether there is a need for the development of additional waste management capacity within the Coventry area over the Plan period. In this regard, while the Plan references the Coventry Waste Strategy (2009-2020), this strategy is concerned only with the municipal waste stream and appears not to provide a strategy for the management of all the wastes identified in the Planning Practice Guidance as needing to be planned for during the plan period (2026 to 2041). The above should be underpinned by a separate Waste Needs	All waste arisings within Coventry, other than municipal solid waste, are exported outside of the city through signed contracts. The Council are currently committed to fund a joint study as part of the WMRTAB joint working arrangements which will produce a report to consider Residual Waste within the region. This will help inform the approach to assessing how waste capacity	Update Appendix 7 - Infrastructure Delivery Plan under the waste subheading as per the agreed approach with WMRTAB.

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						and safeguards existing waste management sites from encroachment by other land uses. It is unclear whether there is a need for the development of additional waste management capacity within the Coventry area over the Plan period.	Assessment of the type advocated by National Planning Policy for Waste and associated Planning Practice Guidance which makes it clear whether current or future management capacity gaps exist or might emerge over the plan period which would require particular attention in the Plan, for example by identifying land which might be developed to ensure any such capacity gaps are addressed. The Waste Needs Assessment should quantify whether existing infrastructure, either within or beyond Coventry can meet projected future needs. Without such an assessment it is not possible to comment on whether any reliance on facilities for the management of Coventry's waste beyond its area is anticipated. The Plan should explicitly safeguard existing waste sites from redevelopment for non waste uses to ensure that important waste management	and needs within Coventry would be considered during the Local Plan period (2021-2041) but it is vital this wider strategic regional study is completed before a more focused Coventry focused study is undertaken and anything other than this would be considered premature. In any event, the Council would consider that the issue of assessing wider waste capacity is considered and highlighted within the associated Infrastructure Delivery Plan which supports the Local Plan Review. The additional figures for waste will be sourced from the West Midlands Residual Waste Needs Assessment (2025).	

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							capacity within Coventry is not lost as a result of competing development pressures.		

Policy EM10 - Non Mineral Development in Mineral Safeguarding Areas

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Mining Remediation Authority (ID34)	EM10	Y	Y	N	N	We note that Policy EM10 relates to Mineral Safeguarding Areas, stating that the designation for MSA should assess and evaluate legacy of past mining in accordance with Policy EM2. The policy goes on to note that it should also ensure that development does not entirely sterilise any potential future mineral extraction should this become viable and desirable and that this should be considered in partnership with the Coal Authority. In its capacity as a statutory consultee for Planning, the Coal Authority has no legislative justification for requiring the safeguarding of surface coal resource. Although in the past we have encouraged the protection of coal reserves, including consideration of prior extraction, our formal remit in this respect lies in providing data to MPAs to assist local decision making, but nothing more. With national policy for a	No response	Agreed.	Delete the words ' <i>This should be considered in partnership with the Coal Authority</i> ' from last sentence of policy EM10. Delete the ref to EM2 and replace with EM11 and 12. Insert the following at the end of para 13.38 ' <i>The Coal Authority's Permitting and Licensing teams should be considered and the need for an Incidental Coal Agreement to remove coal from site during</i>

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						low-carbon future in mind, in January 2021 it was agreed corporately that although we would continue to provide the GIS surface coal data to relevant authorities, all decision making regarding the safeguarding of surface coal would lie with the responsible authority. We no longer be require those authorities with responsibilities for minerals to specifically include surface coal resource within Mineral Safeguarding Areas. We now leave this decision to the relevant authority in recognition of their superior knowledge and understanding of local circumstances and responsibility for local environments and communities. It should also be noted that although the Coal Authority's records may indicate that surface coal resource is present on the site, this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. The data we have access to is not so refined and the depth and quality of "surface coal" resources may vary significantly. We also appreciate that our records are only one of a			<i>development works must be considered. Further information is available via the following sources:</i> Coal mining licence applications - GOV.UK Get a permit to deal with coal or coal mines - GOV.UK Incidental coal agreement - GOV.UK "

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						number of information sources that you may review before identifying your mineral safeguarding areas. In light of the above, and the fact that the Planning team no longer comment on MSAs and any assessment submitted in respect of sterilisation in these areas it would be helpful for clarity to be provided in respect of what is meant in the policy by 'partnership with the Coal Authority'. It would be more appropriate to delete this reference from Policy EM10 and instead include in the pre or postamble signposting to our Permitting, and Licensing teams and the need for an Incidental Coal Agreements to remove coal from site during development works. Coal mining licence applications - GOV.UK Get a permit to deal with coal or coal mines - GOV.UK Incidental coal agreement - GOV.UK			

Policy EM11 - Energy Infrastructure

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Define Planning & Design Ltd on behalf of William Davis Homes(ID14)	EM11	No response	Y	N	Y	NPPF paragraph 158 states that plans should take a proactive approach to mitigating and adapting to climate change and support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. Policy requirements must be achievable. Policy EM11 as written is overly onerous and requires higher standards relating to energy infrastructure. The evidence base published does not sufficiently justify the standards proposed, and indeed it is unlikely that the majority of allocated development sites will be able to comply with the policy, given the viability constraints. Further, the level of detail provided in the policy could become out of date. Therefore, the policy is unsound as it is not justified nor will it be effective.	As such, this policy should be modified.	The standards set out in this policy show the Councils commitment to achieve the aims and objectives set out in its Climate Change Strategy through the planning regime. The standards set out in this policy have been fully supported and developed through the evidence base which include ostensibly the Carbon Policy Support report 2024 and fully tested and supported by the Viability Assessment report 2024.	No change.

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Respo ndent / organi sation / agent	Section	Compl ies with Duty to Coop erate Y/N	Legally Compli ant? Y/N	Soun d Y/N	Does respo ndent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						A more justified approach would be to support the requirements of national policy and legislation, including Future Homes Standard. This will ensure consistency as well as provide clear requirements to development which can then be implemented in a cost-effective and consistent manner. By referring to national policy the Local Plan will be kept up to date in this regard, and be flexible enough to reflect updated standards as and when they are published. In regards to setting higher standards, a 13th December 2023 Written Ministerial Statement (WMS) confirmed that <i>“the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations”</i> because <i>“the proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexities and undermining economies of scale”</i>. The WMS			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						confirmed that “any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rationale”. The December 2023 WMS was challenged, but a judgement by the High Court of Justice dismissed all three grounds for challenge. The December 2023 WMS should, therefore, be taken as the most recent guidance on this matter, particularly given that the new Government has not sought to depart from that position despite setting out its intentions for planning reform in the coming years. Critically, the Local Plan Review Regulation 19 proposes to set higher and additional standards which have not been sufficiently assessed or acknowledged, particularly with regard to viability impact. When viability testing sites under the full ‘net zero’ policy			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						(meaning an uplift in base build costs of 4.8% for houses and 7.9% for apartments) in the Coventry Council Local Plan Viability Report October 2024 (particularly sections 7 and 8), a significant number of allocations would be unviable. Further, the Government plan to introduce Development Management Policies that will address matters such as this consistently across the Country. As such, this policy should be modified.			
Marro ns on behalf of Catesb y Estate s(ID27)	EM11	Y	Y	N	Y	Policy EM11 is unduly onerous and not necessary. The CLPR should not seek to introduce additional standards for residential development due to the forthcoming implementation of the Future Homes Standard later in 2025. Policy EM11 is not justified in line with NPPF Paragraph 35 b) as should be deleted.	Policy EM11 should be deleted.	The standards set out in this policy show the Councils commitment to achieve the aims and objectives set out in its Climate Change Strategy through the planning regime. The standards set out in this policy have been fully supported and developed through the evidence base which include ostensibly the Carbon Policy Support report 2024 and fully tested and supported by the Viability Assessment report 2024.	No change.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Home Builders Federation (ID21)	EM11	N	N	N	Y	Policy EM11 Energy Infrastructure <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> HBF supports the Council in seeking to mitigate and adapt to climate change, including minimising carbon emissions. However, the HBF considers that the Council should ensure that this policy is only implemented in line with the December 2023 Written Ministerial Statement which states that 'a further change to energy efficiency building regulations is 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 continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency	Please refer to representation	The standards set out in this policy show the Councils commitment to achieve the aims and objectives set out in its Climate Change Strategy through the planning regime. The standards set out in this policy have been fully supported and developed through the evidence base which include ostensibly the Carbon Policy Support report 2024 and fully tested and supported by the Viability Assessment report 2024.	No change.

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Respo ndent / organi sation / agent	Seccio n	Comp lies with Duty to Coop erate Y/N	Legally Compli ant? Y/N	Soun d Y/N	Does respo ndent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						for businesses, large and small, to invest and prepare to build net-zero ready homes’. It goes on to state that ‘the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale’. The HBF considers as such it is appropriate to make reference to the Future Homes Standard and the Building Regulations as the appropriate standards for development, and to seek to use these standards to reduce energy use and improve energy efficiency.			

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Respo ndent / organi sation / agent	Section	Com plies with Duty to Coop erate Y/N	Legally Compli ant? Y/N	Soun d Y/N	Does respo ndent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						It would appear that the Council have sought to move away from the carbon reduction methods set out in Part L of the Building Regulations, and have moved towards an assessment of energy use. The HBF supports the Council in seeking to minimise carbon emissions, and reduce heat and power demand through energy efficient design. However, the HBF does not consider that the Council setting its own standards is the appropriate method to achieve these outcomes. Whilst the ambitious and aspirational aim to achieve zero carbon is lauded, the HBF is concerned that the Council is adding to the complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach, which undermines economies of scale for product manufacturers, suppliers and developers.			

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Respo ndent / organi sation / agent	Seccio n	Comp lies with Duty to Coop erate Y/N	Legally Compli ant? Y/N	Soun d Y/N	Does respo ndent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						HBF acknowledges that Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 outlines that development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. The NPPF looks for all plans to take a proactive approach to mitigating and adapting to climate change. However, PPG refers to the Planning and Energy Act 2008, the Deregulation Act 2015, and the Written Ministerial Statement (March 2015) and states that policies in relation to energy performance standards should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes. The impact of this requirement along with others in this Plan may have considerable			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						viability implication and may lead to the non-delivery homes and needs to be fully considered within the Viability Assessment. HBF does not consider that the Council has provided the justification for why Coventry requires a policy that is so significantly above the requirements set out nationally in the building regulations requirements. The HBF does not consider that the Council have provided the justification for why there is a need for the home building industry to consider the unregulated emissions in addition to the regulated emissions, as it is generally acknowledged that developers have limited control over future unregulated emissions. There is no need for the Council Part L, not further or faster.			
Savills on behalf of Bellwa	EM11	N	Y	N	Y	Policies EM1, EM11, EM12 and EM14 The Written Ministerial Statement for Local Energy Efficiency Standards (December 2023)	Please refer to representation	The standards set out in this policy show the Councils commitment to achieve the aims and objectives set out in its Climate Change Strategy through the planning regime.	No change.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
y Homes and Merton College (ID52)						It is important to ensure that all of the below policies are implemented in accordance with the Written Ministerial Statement (2023) which states: <i>“The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.”</i> Policy EM11: Energy Infrastructure Part 4 requires that where viable, all major development should seek to deliver on site renewable energy generation standards. Part 4(a) requires on site annual renewable energy generation at least equal to the predicted annual total regulated and unregulated energy use. However, the requirement to generate		The standards set out in this policy have been fully supported and developed through the evidence base which include ostensibly the Carbon Policy Support report 2024 and fully tested and supported by the Viability Assessment report 2024.	

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						regulated and unregulated energy use conflicts with Policy EM1's definition of regulated embodied carbon. Part 6 relates to the reduced performance gap, but there are concerns that Part 6(a) to provide an assured performance method through all phases of construction to ensure operational energy in practice which performs to predicted levels at the design stage. Bellway and Merton College are concerned that this is overly onerous. Part 8 relates to post occupancy evaluation. There is a concern that 8(a) in monitoring and reporting total energy use and generation values on an annual basis, post 5 years of occupation may conflict with GDPR.			
Stride Treglow on behalf of	13.58-13.60	Y	Y	Y	Y	While the University Group is supportive of the principle of micro-renewable energy generation within major development schemes, the City Council is encouraged to investigate and guide the appropriateness of	This representation is in the interests of creating a	Comments of support duly noted.	N/A.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Coven try Univer sity (ID61)						different forms of energy generation in locations across the City, offering clarity as to the appropriateness of using roof structures for PV's vs Green Roof treatments or Roof based water storage solutions. The University Group supports the objectives as set out in new Policy EM11 to require the inclusion of significant renewable energy generation within any new development especially those with appropriately orientated roofs. The University Group also supports community energy schemes to provide community benefit from large developments and to reduce pressure on the existing grid.	positive, justified, effective and deliverable plan which recognises cross-referencing to policy objectives within defined areas of the City Centre.		

Policy EM12 - Reducing operational carbon in new build non-residential development

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Turley on behalf of the University of Warwick (ID68)	EM12 Part 1a, 2a, 2c, 4b, 5b, 6a	Y	Y	N	Y	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	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.	The %TER reduction targets are not limited to be solely delivered through energy efficiency measures. Therefore, there could be an element of clean energy supply or renewable energy measures included in these. Further renewable energy will be needed to subsequently meet the requirement of section 4, therefore applicants are advised to pursue energy efficiency measures as far as feasible in the first instance in pursuit of Policy the targets in section 1, so that	No change.

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Respo ndent / organi sation / agent	Sect ion	Compli es with Duty to Coope rate Y/N	Leg ally Co mpl iant Y/N	So un d Y/ N	Does responde nt wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						been shown to be technically and financially challenging. Part 2 a of the policy states <i>“Positive weight will be given to applicants who can demonstrate the following absolute energy metrics:”</i> 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/m2 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 EM12 parts 1a, 2a, 2c, 4b, 5b,6a. 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		the subsequent section 4 renewable energy requirements (to match 100% of regulated energy use) are not rendered excessively expensive or unfeasible. Designing to use less energy in the first place reduces the amount of renewable energy needed to match this, and/or the amount of carbon offset payment needed. It should be noted that the current Part L for non-domestic buildings, the type of heating system in the ‘notional’ building (from which the TER is derived) is the same as the type of heating system in the actual proposed building. Therefore, no TER gains will	

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Respo ndent / organi sation / agent	Sect ion	Compli es with Duty to Coope rate Y/N	Leg ally Co mpl iant Y/N	So und Y/ N	Does responde nt wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						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		be made by switching from a gas or oil boiler to a heat pump or other all-electric or otherwise low-carbon heat system. However, TER improvements <i>can</i> be made through selecting a heating system that is <i>more efficient than Part L 2021’s notional efficiency for that heating type</i>. The requirement for offsetting may be applied flexibly where it is demonstrated that this makes otherwise desirable development unviable due to the unique energy use profile of the proposed building and site characteristics where this results in an offsetting cost uplift significantly higher	

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Respo ndent / organi sation / agent	Sect ion	Compli es with Duty to Coope rate Y/N	Leg ally Co mpl iant Y/N	So und Y/ N	Does responde nt wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						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/m2 building footprint / yr. The target in part 4 b of Policy EM12this policy is more than double this.		than assessed in the Whole Plan Viability Assessment. The flexibility could include a reduction in the scope of energy that has to be offset, or a discounted price per kWh if the Council is confident it can still deliver the required offset projects within this price (when pooled into the offsetting fund which will primarily consist of full-price offset contributions). The degree of flexibility will depend on the unique scheme characteristics and evidence submitted about what could be viably accommodated. It may also depend on the degree to which the proposed development represents a socially desirable facility that meets	

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Respo ndent / organi sation / agent	Sect ion	Compli es with Duty to Coope rate Y/N	Leg ally Co mpl iant Y/N	So un d Y/ N	Does responde nt wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						To achieve 115kWhrs/m2 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 3rd party?		unmet community needs (such as for healthcare, education, or similar). Regarding assured performance processes, in addition to those mentioned in relation to the equivalent residential policy element, there is also one additional method for non residential: NABERS UK (administered by CIBSE). NABERS is currently only available for offices but intended to extend to other building types in future.	

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						Given that the University is already implementing such methods, it would not support a requirement for this to be assessed by a 3rd party.			
Savills on behalf of Bellwa y Homes and Merto n Colleg e(ID52)	EM1 2	N	Y	N	Y	The Written Ministerial Statement for Local Energy Efficiency Standards (December 2023) It is important to ensure that all of the below policies are implemented in accordance with the Written Ministerial Statement (2023) which states: <i>“The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.”</i>	Please refer to representation.	The %TER reduction targets are not limited to be solely delivered through energy efficiency measures. Therefore, there could be an element of clean energy supply or renewable energy measures included in these. Further renewable energy will be needed to subsequently meet the requirement of section 4, therefore applicants are advised to pursue energy efficiency measures as far as feasible in the first instance in pursuit of Policy the targets in section 1, so that the subsequent section 4 renewable energy	No change.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Policy EM12: Reducing Operational Carbon in New Build Non-Residential Development It is requested that the policy is amended to provide more detail on the methodology. Part 2(a) sets out targets for energy metrics, such as total energy use (65 kWh/m2/year) and space heating demands (15 kWh/m2/year). The targets here are very generic, especially for any non-residential uses. 4.53. Part 6 relates to the reduced performance gap, but there are concerns that Part 6(a) to provide an assured performance method through all phases of construction to ensure operational energy in practice which performs to predicted levels at the design stage. Bellway and Merton College are concerned that this is overly onerous.		requirements (to match 100% of regulated energy use) are not rendered excessively expensive or unfeasible. Designing to use less energy in the first place reduces the amount of renewable energy needed to match this, and/or the amount of carbon offset payment needed. It should be noted that the current Part L for non-domestic buildings, the type of heating system in the 'notional' building (from which the TER is derived) is the same as the type of heating system in the actual proposed building. Therefore, no TER gains will be made by switching from a gas or oil boiler to a heat	

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Respo ndent / organi sation / agent	Sect ion	Compli es with Duty to Coope rate Y/N	Leg ally Co mpl iant Y/N	So und Y/ N	Does responde nt wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
								pump or other all-electric or otherwise low-carbon heat system. However, TER improvements <i>can</i> be made through selecting a heating system that is <i>more efficient than Part L 2021's notional efficiency for that heating type</i>. The requirement for offsetting may be applied flexibly where it is demonstrated that this makes otherwise desirable development unviable due to the unique energy use profile of the proposed building and site characteristics where this results in an offsetting cost uplift significantly higher than assessed in the Whole Plan Viability Assessment.	

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								The flexibility could include a reduction in the scope of energy that has to be offset, or a discounted price per kWh if the Council is confident it can still deliver the required offset projects within this price (when pooled into the offsetting fund which will primarily consist of full-price offset contributions). The degree of flexibility will depend on the unique scheme characteristics and evidence submitted about what could be viably accommodated. It may also depend on the degree to which the proposed development represents a socially desirable facility that meets unmet community needs	

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
								(such as for healthcare, education, or similar). Regarding assured performance processes, in addition to those mentioned in relation to the equivalent residential policy element, there is also one additional method for non residential: NABERS UK (administered by CIBSE). NABERS is currently only available for offices but intended to extend to other building types in future.	
Stride Treglow on behalf of Coventry Univer	13.69-13.70	Y	Y	Y	Y	The University Group are actively engaged in the delivery of academic programmes linked to Sustainable Development and environmental impacts and outcomes. The University Group would be keen to engage with the Council to bring forward mutually beneficial initiatives and approaches which secure positive planning and	This representation is submitted for background / reference purposes and in support of creating a positive, justified, effective and deliverable plan which recognises cross-referencing to policy	Comments of context and support for mutual benefit are duly noted.	N/A.

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Respo ndent / organi sation / agent	Sect ion	Compli es with Duty to Coope rate Y/N	Leg ally Co mpl iant Y/N	So und Y/ N	Does responde nt wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
sity (ID61)						university outcomes in the context of Local Plan policies. The University Group has developed a comprehensive Decarbonisation Strategy (2023) with specific action plans generated by this being delivered over the life of the current and emerging Local Plan review periods. Options and initiatives which support zero carbon transport and carbon neutral development schemes will be considered as part of the University Group's wider development ambitions (and Masterplan development) over the life of the Local Plan.	objectives within defined areas of the City Centre.		

Policy EM13 - Overheating in new buildings

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Turley on behalf of the University of Warwick (ID68)	EM 13	Y	Y	Y		The University consider Policy EM13 to be sound. However, would like to note that in terms of the hierarchy as set out in part 1a(ii), building orientation is always considered in reducing overheating, however, in some cases, site constraints can limit the opportunities for this. There are also cases where mechanical ventilation with very high heat recovery systems can be more effective than passive ventilation where buildings are occupied by a wider range of users.	N/A.	Observations duly noted.	No change.
Home Builders Federation (ID21)	EM 13	N	N	N	Y	<i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i> Criterion 2a requires all residential development should complete CIBSE	Please refer to representation.	Part O of Building Regulations requires overheating assessments to be undertaken in residential development, with CIBSE TM59 provided as one route to compliance for residential	No change.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						TM59 overheating assessment as their route to compliance with Building Regulations Part O. The simplified Part O route will not be considered acceptable. HBF do not believe this approach is justified. There is no need for planning policy to repeat building regulations.		buildings. Therefore, parts 1 and 2 are aligned with national policy approaches. However, Part O does not require that TM59 is completed, as the Simplified Method can be alternatively used. Additionally, CIBSE TM52 is not referenced because Part O does not relate to non-residential buildings. The Housing Update Written Ministerial Statement (15 December 2021) states that there is no need for local policy to duplicate Part O policy. The cooling hierarchy (part 1) is not referenced in Part O and CIBSE assessment are not <i>required</i>, therefore part 2 neither is a duplicate. The extensively referenced 2023 WMS does not impact parts 1 and 2 as the scope of the WMS only	

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
								impacts energy efficiency standards.	

Policy EM14 - Embodied carbon and waste

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
West Midlands Resource Technical Advisory Body (WMRTAB) (ID73)	EM14	n/a	n/a	n/a	N	WMRTAB notes and broadly welcomes policy EM14 in the Coventry Local Plan which: - requires all new development to consider how waste will be minimised and reuse and recovery of materials will be facilitated; and, - prioritises waste prevention, reuse, recycling, and recovery.	N/A.	Comments of support duly noted.	N/A
Turley on behalf of the University of	EM14	Y	Y	N	Y	The University is supportive of the theme of Policy EM14 but consider that it is unsound in relation to how part 2a is currently worded.	The University would suggest that the wording of this policy is considered as to whether it can be amended to reflect	There is significant scope for future improvements for embodied carbon and waste policies. In particular, standards set under part 2a could possibly be lowered in future as embodied carbon policy becomes	Insert the following text at the end of 2a to read: "A <i>Supplementary Planning</i>

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Warwick (ID68)						It is considered that a single target for all non residential building types as set out in part 2a is likely to be under ambitious for some uses and potentially challenging for others.	how a single target may be applied to varying types of development, given their different characteristics.	integrated into local and national policy. As policy is implemented on embodied carbon, industry would become better placed to deliver on ambitious policy requirements and move towards net zero embodied carbon emissions.	<i>Document (SPD) or future national equivalent will provide further guidance in this regard''.</i>
Home Builders Federation (ID21)	EM14	N	N	N	Y	The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy Criterion 1a Embodied carbon reporting requires all major new residential (10 dwellings or more) and non-residential (1000 m2 floorspace or more) developments are required to complete a whole-life carbon assessment in accordance with Royal Institute of Chartered Surveyors (RICS) Whole Life Carbon Assessment guidance. HBF believes this is disproportionate and should not apply to all major	Please refer to representation	Information and requirements on embodied carbon assessments could be set out in supplementary policy documents, or future national equivalent to enable developers to sufficiently demonstrate policy compliance. SPD would provide further guidance on how methodologies and the scope of embodied carbon assessment could be clarified, alongside other potential implications such as third-party verification. Similarly, acceptable methodologies (i.e. RICS Whole-Life Carbon	Add in reference to SPD / further guidance

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sounded Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						development. A more proportionate approach is needed. Criterion 2a limiting embodied carbon states that all large-scale major development (50 dwellings or more) is required to limit embodied carbon (RICS/BS 15978 modules A1 – A5) to 600 kgCO₂e/m² GIA. HBF believes this is disproportionate and should not apply to all major development. A more proportionate approach is needed.		Assessments guidance) to comply with 2a could be set out in guidance.	
Savills on behalf of Bellway Homes and Merto	EM14	N	Y	N	Y	The Written Ministerial Statement for Local Energy Efficiency Standards (December 2023). It is important to ensure that all of the below policies are implemented in accordance with the Written Ministerial Statement (2023) which states: <i>“The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s</i>	Please refer to representation	There is significant scope for future improvements for embodied carbon and waste policies. In particular, standards set under part 2a could possibly be lowered in future as embodied carbon policy becomes integrated into local and national policy. As policy is implemented on embodied carbon, industry would become better placed to deliver on	Insert the following text at the end of 2a to read: <i>“A Supplementary Planning Document (SPD) or future national equivalent will</i>

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
n College (ID52)						<i>commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations."</i> Policy EM14: Embodied Carbon and Waste Part 2 sets out the requirements for limiting embodied carbon. It is considered Part 2(a) is too generic to reflect a range of domestic and non-domestic uses. Regarding Part 3(a) for planning for a building's end of life, it is considered that this will not be possible to demonstrate this. Clarification is required as to how to demonstrate compliance with this requirement.		ambitious policy requirements and move towards net zero embodied carbon emissions. Information and requirements on embodied carbon assessments could be set out in supplementary policy documents, or future national equivalent to enable developers to sufficiently demonstrate policy compliance. SPD would provide further guidance on how methodologies and the scope of embodied carbon assessment could be clarified, alongside other potential implications such as third-party verification. Similarly, acceptable methodologies (i.e. RICS Whole-Life Carbon Assessments guidance) to comply with 2a could be set out in guidance.	<i>provide further guidance in this regard".</i>

Policy EM15 - Noise

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Stride Treglown on behalf of Coventry university (ID61)	13.77-13.78	Y	Y	Y	Y	As referenced elsewhere in the University Groups' representation, it should be noted that major new developments are not required to ameliorate pre-existing impacts. This is important in the context of major developments within the City Centre, where existing traffic levels accommodated by previous road-building programmes are significant, with the associated air quality and noise issues. Background noise levels within the City Centre are elevated and the amenities of City Centre residents are therefore different to those living in suburban areas. Such issues are expected to be addressed as part of technical impact	This representation is in support of creating a positive, justified, effective and deliverable plan which recognises the principle that development proposals must demonstrate no additional significant detrimental residual impacts.	CCC agree that technical assessments for noise impact and air quality are always required for major planning applications. CCC also agree that expected amenity levels are different in the city centre as compared to the suburbs, but also some of the city centre will fare better as being quieter and cleaner than main roads leaving the city centre. Existing impacts won't be covered retrospectively through the planning regime, but new applications should always be seeking to improve conditions. When assessing new applications assessments have to be	No change.

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						assessments submitted in support of major planning applications.		cumulative taking account of both existing and new (proposed) impacts.	

Overarching comments (non-policy)

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Stride Treglown on behalf of Coventry University (ID61)	13.1-13.10	Y	Y	Y	Y	The University Group considers that the impacts of global heating are becoming more frequent and more severe. Given the decades long life span of new buildings, they need to be net zero ready now rather than in 2050 to avoid loading significant retrofit costs onto future owners and occupiers. In relation to the references to Environmental Hazards within the Chapter, it should be noted that major new developments are not required to ameliorate pre-existing impacts per se. This is important in the context of major developments within the City Centre, where existing traffic levels accommodated	This representation is in the interests of creating a positive, justified, effective and deliverable plan and which does not place onerous requirements on emerging development projects.	CCC welcome the positive statement of Coventry University to work positively with the Council in the greening of the city centre.	N/A.

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						by previous road-building programmes are significant, with the associated air quality and noise issues. Background noise levels within the City Centre are elevated and the amenities of City Centre residents are therefore different to those living in suburban areas. Notwithstanding this, the University Group accepts that opportunities to introduce a greening of the urban form in the City Centre could play an important role in transforming the area, alongside changes in traffic routing which could generate positive outcomes for all. The University Group will work with the City Council to bring forward positive outcomes in the City Centre and in line with the University's development ambitions and Masterplan proposals.			

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Miner al Produc ts Associ ation (ID33)	13. 31	No respon se	No resp onse	N	N	Para 223 of the NPPF Requires that planning policies should 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. There is currently no such policy in the Plan.	We would propose the following policy is added: EM <i>**Infrastructure that supports the supply of minerals is safeguarded against development that would unnecessarily sterilise the infrastructure or prejudice or its current or future use, throughput and/or capacity. A redevelopment of all or part of a safeguarded site to non-mineral use will only be supported if: a. the infrastructure is no longer needed; orb. the capacity of the infrastructure can be provided elsewhere. In such instances, alternative capacity should: i. must be at least equal to the proposed loss and should must be delivered in advance of redevelopment of all or part of the existing site; and ii. be</i>	There have been no proposals put forward through this Plan for such uses and existing policy wording is considered appropriate.	No change.

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							<i>appropriately and sustainably located; and iii. conform to the relevant environmental and community protection policies in this Plan; or c. the proposed development is part of a wider programme of reinvestment in the delivery of enhanced capacity for minerals supply. Where a non-mineral development is within proximity to a safeguarded site the 'agent of change principle' will be applied and any mitigation required must be completed by the applicant prior to occupation of the non mineral development for any purpose.</i>		

Chapter 14 – Coventry City Centre

Policy CC1 – Coventry City Centre Development Strategy

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Tyler Parkes on behalf of PCCWM (ID69)	CC1-a	Y	Y	N	Y	Whilst the PCCWM does not wish to object to the policy per se, nevertheless for consistency with Policy R2 he considers that the 9th bullet point of the policy should be amended as set out below. Similarly, it is noted that the 13th bullet point also makes reference to 'Continuing to develop a vibrant and	For consistency with Policy R2M the PCCWM considers that the 9th bullet point of Policy CC1 should be strengthened to read as follows: <i>Providing an attractive, <u>safe and secure environment for pedestrians, cyclists and</u></i>	Links to standards are covered elsewhere in the plan, which much be read as whole so there is no need to duplicate.	No change

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						<i>attractive nighttime economy.'</i> However, as no specific evening economy policy is proposed, particularly in the current absence of any policy in the consultation draft to reduce crime or the fear of crime, the PCCWM must therefore OBJECT to the omission of a policy reference under Policy CC1 to the evening economy policy.	<u>motorists, including integration of 'Secured by Design' and 'Park Mark' principles.</u> (Suggested changes in bold and underlined). Introduce a policy cross-reference to an evening economy policy.		
Enviro nment Agenc y (ID15)						Water Quality and Resources We welcome reference to the Water Framework Directive (WFD) in Policies CC1 Part B and EM6 and the emphasis on Sustainable Drainage Systems (SuDS) in Policy EM5 and the preference for nature-based solutions in Policy GE1. WFD reference of course applies to the whole plan area, not just the City Centre.		Noted	No change

Chapter 15 - Infrastructure

Delivery, Implementation and Monitoring

Policy IM1 - Developer Contributions for Infrastructure

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legal Compliance? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Tetlow King Planning	IM 1	N	N	N	N	Policy IM1: Developer Contributions for Infrastructure The WMHAPC supports the Council's commitment to ensuring that developments contribute to necessary	Respondent comment: 'Refer to previous representation response'	Noted however these would be	No change

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behalf of the West Midlan ds Housin g Associ ation Planni ng Consorti um (ID63)						infrastructure, which is essential for creating sustainable and well-served communities. However, as currently drafted, the policy does not adequately consider the financial viability of 100% affordable housing schemes. These developments operate within tight financial constraints, often relying on public funding and subsidies to remain feasible. Without specific exemptions or reductions in infrastructure contributions, the policy may unintentionally hinder the delivery of much needed affordable homes. To address this, the WMHAPC urges the Council to include a caveat clarifying that planning decision-makers should take viability constraints into account when applying the requirement: <i>"The Council will, where appropriate, seek to secure site-specific infrastructure investments and/or contributions, as well as off-site contributions and/or investments."</i> While criterion 5 acknowledges that applicants facing viability concerns may submit a detailed Viability Assessment, this approach places an additional administrative and financial burden on affordable housing providers. To streamline the process and		considered on a case by case basis	

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						provide greater certainty, the WMHAPC recommends an explicit exemption for 100% affordable housing schemes from infrastructure contributions. Without this safeguard, there is a risk that such projects could become financially unviable, delaying or preventing their delivery. Moreover, to ensure that necessary infrastructure is still provided alongside affordable housing developments, the Council should explore alternative funding mechanisms. This could include joint approaches such as pooling S106 contributions from neighbouring developments, leveraging government grants, or forming partnerships with housing associations and developers to secure funding from external sources. By adopting a more flexible and strategic approach, the Council can support the delivery of affordable homes while ensuring that essential infrastructure is not compromised.			
Tyler Parkes on behalf	IM 1	Y	Y	N	Y	Incidents of crime are a characteristic of urban living, and it is an unfortunate fact that an increase in the resident population of an area is likely to see a consequential increase in the relative levels of crime	Policy IM1 to be suitably amended to include a clear reference to the	This would need to be evidenced on a case-by-	No change

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of PCCW M (ID69)						taking place. Detailed, up-to-date, statistics on the levels and distribution of crime across the West Midlands area are available online. This data could provide a usual monitoring resource for the Council. It could also be used to provide a brief summary of the incidence of crime in the Profile of the Borough if that was considered appropriate. To assist, however, the PCCWM provides the below figures based upon WMP data collection Office of National Statistics (ONS) household statistics, and which summarises levels of crime within Coventry for the last full calendar year, 2024. The proposals in the emerging local plan for the provision of 29,100 new dwellings (1,455 per annum) represent an increase of around 18.6% over the number of homes in the City. A consequential increase in population will inevitably result in an unfortunate increase in crime levels. Recent statistics show levels of offending in Coventry 45% higher than the national rate for England as a whole (Coventry Crime and Safety Statistics Crime Rate).It therefore follows that:• The demands placed on the police service are likely to rise as the local population	emergency services, and specifically the Police, as a recipient of Infrastructure funding via S106 obligations and/or any future adopted CIL arising from development. This could be achieved by way of specific reference in the policy, a suitable footnote or inclusion of a suitably worded definition of Infrastructure, to include “blue light” emergency services and/or the Police in an updated glossary to accompany the Local Plan Review.	case basis in relation to a planning application, and it would need to be demonstrated that there are no other sources of funding and that there is a genuine need as set out in the CIL regulations	

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						increases. • The demands on the police are exacerbated by the major changes in the nature of crime and methods needed to deal with it, particularly regarding cyber-related crime and terrorism. • Significant additional resources will be required to meet the Policing requirements from the rising population. This is likely to include not only start-up and training costs of new officers and support staff but also supporting equipment and infrastructure. • As Coventry's population increases, there is an urgent need to ensure that new development and growth is supported by adequate policing infrastructure, in the interest of creating sustainable communities. The PCCWM clearly has a statutory duty to secure the maintenance of an efficient and effective police force for its area and, of course, the Council is also statutorily required to consider crime and disorder and community safety in the exercise of its duties, with the aim of achieving a reduction in crime. The PCCWM requests that in accordance with national planning policy, the theme of community safety and crime prevention is given prominence in the Coventry Local Plan, with appropriate references being included			

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						as set out in the following detailed comments. Additionally, and especially in and around the major facilities and infrastructure present in the city ensuring the timely and effective engagement of the Police in relation to CounterTerrorism matters, e.g. Counter Terrorism Security Advisors, is crucial. OBJECTION - Policy IM1: Developer Contributions for Infrastructure – UNSOUND The PCCWM made extensive representations to the Regulation 18 consultation in respect of this policy and the Infrastructure Delivery Plan (IDP) and those should be read in conjunction with these representations. It is noted that although the representations to the Regulation 18 consultation are not referred to in the Consultation Statement, the IDP now makes reference to emergency services, albeit with an emphasis on fire services, with only passing reference to continued consultation with the Police Authority. However, on this point it is important to point out that thus far any such consultation appears to have been scant. To achieve sustainable development, as required by the NPPF and PPG, the necessary support infrastructure must be identified			

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						through proactive engagement between the Council, developers, and the infrastructure providers, including the Police. Infrastructure needs and costs arising as a result of the proposed growth in the Plan should be included in the Infrastructure Delivery Plan (IDP) and specific requirements should be clearly set out in the individual site allocation policies and/or accompanying Masterplan, Development Plan, Area Action Plans (AAPs) or Supplementary Planning Documents (SPDs), to ensure that developers are aware of their obligations at the outset. The day-to-day operation of a modern police force such as WMP requires flexibility and mobility to be able to respond in an effective and efficient manner. Officers are increasingly mobile, and as such there is a reduced reliance on physical “bricks and mortar” and a greater emphasis upon infrastructure such as, but not restricted to, equipment and police vehicles. The PCCWM contends the local plan should be clear on the definition of infrastructure and that social infrastructure includes Police and other emergency services. The recently amended NPPF (December 2024) now confirms “blue light” (i.e. emergency)			

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						services infrastructure as carrying significant weight when considering proposals for new development, which would clearly include the planned growth set out within the emerging Local Plan. It is therefore entirely relevant and appropriate for Policy IM1 to be suitably amended to include reference to the emergency services, and specifically the Police. This could be achieved by way of specific reference in the policy, a footnote or inclusion of a suitably worded definition of Infrastructure, to include “blue light” emergency services and/or the Police in a glossary. It is clear that growth during the plan period will inevitably have implications for the maintenance of safety and security in the city and there will clearly be a need for additional and/or enhanced Police infrastructure. The inclusion of the police and emergency services provision as infrastructure required to support development is fully compatible with legislation and national planning policy, as follows: Section 17 of the Crime and Disorder Act 1998 states, ‘Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its			

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						various functions with due regard to the likely effect of the exercise of those functions on, and the 15 need to do all that it reasonably can to prevent, crime and disorder in its area'.The PCCWM therefore has a statutory duty to secure the maintenance of an efficient and effective police force for the area. Coventry City Council is also statutorily required to consider crime and disorder and community safety in the exercise of its duties with the aim of achieving a reduction in crime. The NPPF, December 2024, Paragraph 2 states that the NPPF must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements. Paragraph 7 of the NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development and Paragraph 8 confirms that achieving sustainable development means that the planning system has three overarching objectives: an economic, a social and objective. These objectives include supporting strong, vibrant and healthy			

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						communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment. Paragraph 20 of the National Planning Policy Framework (NPPF) includes, inter alia, a requirement for policies to deliver sufficient provision for infrastructure, including those related to security, with Paragraphs 16, 26 and 28 indicating that this could be delivered through joint working with all partners concerned with new development proposals. Section 8 of the NPPF "Promoting health and safe communities", Paragraph 96, identifies that planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder and the fear of crime, do not undermine the quality of life or community cohesion. Paragraph 101 confirms that "blue light" (i.e. emergency) services infrastructure attracts significant weight when considering proposals for new development and calls for local planning authorities and developers to work proactively and positively with such services at the pre-application stage in			

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						particular. Paragraph 135 (f) of the NPPF calls for the creation of safe places where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. Annex 2 (NPPF) identifies the police as “Essential local workers”, defined as “Public sector employees who provide frontline services including health, education and community safety.” It is also noteworthy that Part 10A Infrastructure Levy: England of the Levelling Up and Regeneration Act 2023 (LURA) confirms at Section 204N (3) relating to Infrastructure Levy regulations that “infrastructure” includes “(h) facilities and equipment for emergency and rescue services”. Whilst the LURA appears unlikely to advance in the same manner as was envisaged by the previous Government, there is a clear recognition that infrastructure for the emergency services, which would obviously include Police, should be recognised and that such infrastructure would include both facilities AND equipment. Increases in local population and the number of households do not directly lead to an increase in funding for the Police Service (WMP) from Central Government. It is			

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						therefore necessary to secure future CIL and/or S.106 contributions for infrastructure due to the direct link between the increased demand for policing services and changes in the physical environment due to new housing and economic growth, which have permanent impacts on future policing and demands upon WMP. Securing contributions towards policing enables the same level of service to be provided to residents of new developments, without compromising the existing level of service for existing communities and frontline services. Put simply, the consequence of no additional funding is that existing infrastructure will become severely stretched and thereby have a severe adverse impact on the quality of the service that WMP are able to deliver. The High Court judgement of Mr Justice Foskett in The Queen and Blaby DC and Others [2014] EWHC 1719 (Admin) (at Appendix 1) is a clear example of the case for S106/CIL contributions towards Police infrastructure. In that case, a development of 4,250 dwellings, community and retail development, schools and leisure facilities was proposed, the judgement reads: "It is obvious that a development of the nature described would place			

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						additional and increased burdens on local health, education and other services including the police force.” (Para 11).The judgement goes on to comment that: “Those who, in due course, purchase properties on this development, who bring up children there and who wish to go about their daily life in a safe 7/12 environment, will want to know that the police service can operate efficiently and effectively in the area. That would plainly be the “consumer view” of the issue.” (Para 61). “I am inclined to the view that if a survey of local opinion was taken, concerns would be expressed if it were thought that the developers were not going to provide the police with a sufficient contribution to its funding requirements to meet the demands of policing the new area.” (Para 62).To ensure that levels of service can be maintained for both existing and future residents in the wider Coventry area, developer contributions through the mechanism of a future CIL and/or S.106 Obligations for Police infrastructure are considered essential. Planning and S78 Appeal decisions (see Appendix 2) have long recognised that the infrastructure requirements of the Police are perfectly eligible for			

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						consideration and can be allocated financial contributions through S106 Obligations which accompany qualifying planning permissions for major development (residential and commercial alike), with the Planning Inspector in PINS appeal reference APP/X2410/A12/2173673) stating that: "Adequate policing is so fundamental to the concept of sustainable communities that I can see no reason, in principle, why it should be excluded from purview of S106 financial contributions...".Changes in general population do not increase the overall funding made available to WMP through Central Government grant. Even if there were to be an increase in funding because of development growth, such funding would be fully utilised in contributing to additional salary, revenue and maintenance costs (i.e. not capital costs). That being the case, such funding would not be available to fund the infrastructure costs that are essential to support significant new development growth during the Plan Period. The definition and support for infrastructure should be explicitly set out in the Local Plan, to meet national and local policy objectives relating to safety and security, and it			

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						should be clearly set out that contributions will be required through the introduction of a CIL/ S.106 agreements to help fund the provision and maintenance of facilities and equipment for Police services, in order to sustain the level of growth proposed in the Coventry Local Plan. Fully updated details of Police infrastructure funding requirements are set out in attached Appendix 3. In order to meet the national policy objectives of ensuring safety, reducing crime and the fear of crime, it is vital that the Police are not under-resourced or deprived of legitimate sources of funding. The aim is to deploy additional staffing and additional infrastructure to cover the demand arising from new development at the same level as the policing delivered to existing households. Hence, additional development would generate a requirement for additional staff and additional personal equipment (such as workstations, radios, protective clothing, uniforms and bespoke training), police vehicles of varying types and functions. If additional policing infrastructure is not provided, future growth in Coventry will seriously impact on the ability of the Police to provide a safe			

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						and appropriate level of service and to respond to the needs of the local community. That outcome would be contrary to national policy. As the Statutory Development Plan, it is the purpose of the emerging Coventry Local Plan to confirm the types of infrastructure which will be required to provide sustainable development in the City during the plan period and the Policy IM1 and supporting text should be amended as suggested above to specifically include reference to Police infrastructure. Without these changes the PCCWM wishes to raise the strongest of objections, and maintains that the Local Plan Review is UNSOUND			
CBRE on behalf of Network Rail (ID7)	IM 1					Policy IM1 – Developer Contributions for Infrastructure (pp 174 – 175) Policy IM1 provides a general framework for ensuring that developments make provision for associated necessary infrastructure (unless shown to be unviable to do so). It requires that, subject to viability, new developments should be supported by site-specific infrastructure investments and/or contributions as well as off-site contributions and/or investments. The nature and scale of these will be related to the form	Network Rail supports the Plan's confirmation through this Policy (and elsewhere in the draft Plan) that developments should make provision for associated necessary infrastructure (i.e.	Noted	No change

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						of development and its potential impact on the site and surrounding area. Developer contributions will contribute towards strategic infrastructure required to support the overall development in the Plan as defined in the Infrastructure Delivery Plan.	that development should form an important part of the future investment in improving the transport network). Alongside Network rail's own investment, contributions from development will be an important aspect to ensuring the delivery of the new and improved rail infrastructure needed.		
Home Builders Federation (ID21)	IM 1	N	N	N	Y	Policy IM1: Developer Contributions for Infrastructure <i>The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i>	Respondent comment: 'Please refer to representation'	Monitoring is included in the appendices to the plan. Plans are required to	No change

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						136. Policy IM1 is only about infrastructure. There is not policy relating to implementation and monitoring and as such the Plan will not be effective, justified or consistent with national policy and is unsound. 137. Assuming that this Plan continues under the transitional arrangements (which HBF have questioned elsewhere in our response) then there would be a requirement for a Local Plan policy on implementation and monitoring policy that clearly sets out the commitment to an immediate review of the Local Plan as required by the NPPF 2024 transitional arrangements 138. HBF do not support the inclusion of policies within a Local Plan that merely triggers a review of the Local Plan if monitoring shows housing delivery is not occurring as expected. Such a policy does nothing to address the housing crisis or		be monitored there is no need for a specific policy. The strategic policies of the plan also have to be reviewed every 5 years.	

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						undersupply of homes. There are other more effective and immediate measures that could be introduced into policy that would enable the Council to address housing under deliver, much more quickly than would be possible through the production of another plan, or plan review. 139. It is important that houses are brought forward, and the matter addressed as soon as possible, if under delivery is observed. HBF would suggest, as a minimum, explicit reference should be made within the Plan's policy and monitoring framework to the potential to bring forward additional housing supply earlier. As the housing need and requirement figures for the Plan are minimum (not maximum) figures the Council could also specifically identify reserve sites and/or include policies that would allow for additional windfall housing sites that could/would be brought forward sooner to address any under delivery whatever the			

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						reason for that under performance. This could be a shortfall in market housing permissions granted and/or completions, affordable housing permissions granted and/or completions and any failure against the Housing Delivery Test or local plan monitoring. This all needs to be reflected within an updated Monitoring Framework. 140. Coventry should also monitor the delivery of any unmet need by neighbouring authorities and actively participate in local plan consultation and examination to ensure the need for other authorities to meet their need is robustly supported in neighbouring Local Plans. 141. The Plan needs to set out how and when monitoring will be undertaken, and more information is needed on what action(s) will be taken when if monitoring shows under delivery of housing. Not doing so means the plan will be ineffective and therefore			

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						unsound. Merely committing to collect data on particular indicators is not the purpose of monitoring, monitoring should be a way to assess if the Plan is working and to take action if it is not. Without action the Plan and the policy will be ineffective, unjustified and contrary to national policy, and the Plan would therefore be unsound.			
NHS Property Services (London Office) (ID41)	IM1				N	Draft Policy IM1 expects developments to provide, or contribute towards provision of, the necessary site—specific infrastructure requirements to mitigate the impact of development. Health infrastructure should be recognised and clearly identified in the Local Plan as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing		Noted. The council works closely with the ICB and the Local Estates Forum. The Infrastructure Delivery Plan (IDP) includes a hook to the Infrastructure plan of the ICB.	No change

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						growth and the need for mitigation must also be considered by the Plan. We emphasise the importance of effective implementation mechanisms so that healthcare infrastructure is delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area. We request that the Council engage with the NHS, including the Coventry and Warwickshire Integrated Care Board (ICB), to further refine the identified healthcare needs and proposed solutions to support the level of growth proposed by the Local Plan, prior to submission. This should include adding further detail within the Local Plan and supporting evidence base (IDP) regarding the process for determining the appropriate IM1 form of contribution		Developer contributions are assessed on a case by case basis through the planning application process.	

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						towards the provision of healthcare infrastructure, where this is justified. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new developments create a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be clarified that the NHS and its partners will need to work with the council in the formulation of appropriate mitigation measures.			
NHS Property Services	IM 1				N	The draft policy requirements identified in the Plan are supported by the Local Plan Viability Report (2024). Having reviewed the report, we note that where contributions towards healthcare have been identified in the policy requirements for site-specific		CCC notes the general support for the viability testing, and	No change

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(Londo n Office) (ID41)						testing, the assessment does not include a specific allowance for contributions towards healthcare. The report tests a lump sum for S106 contributions of £8395 per unit for flats and £10,975 per unit for houses to cover site specific mitigation. Without prejudice to any future representations the NHS or its partners may make on specific planning applications or applications for CIL funding, in our view the S106 headroom identified as part of the site-specific testing is generally sufficient to enable financial contributions to be secured for healthcare, and therefore we consider that overall the assessment of plan-wide viability demonstrates that policy requirements in relation to healthcare infrastructure contributions are deliverable. However, we are concerned that without explicit mention of required healthcare mitigation in the viability assessment, healthcare mitigation will compete with other planning obligations or be ignored entirely, rendering development unsustainable.		notes the comments on infrastructure (NB Coventry does not operate CIL). The council considers its policy are sound in terms of general support for contributions where a need can be demonstrated but details would need to be considered	

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						Healthcare facilities are currently experiencing significant strain. Where appropriate mitigation is not secured, the growth strategy outlined in the Plan is expected to exacerbate this situation. We would recommend that the viability assessment includes a separate cost input for typologies where a healthcare contribution is expected. This Viability Assessment would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development. A separate cost input for health would also mean that developers are adequately informed in advance, in accordance with ICB's estate strategy and the development's location and size, that they may be required to make on-site provision or off-site financial contributions to mitigate the impact on healthcare infrastructure resulting from their development. Such an approach would also support the effective implementation of Draft Policy IM1 in situations when a viability assessment demonstrates that development proposals are unable to fund the full		at the planning application stage. However the support for further engagement and detailed discussion with the ICB on its own infrastructure strategy is welcomed	

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						range of infrastructure requirements. We would welcome further engagement with the Council to on this issue to determine a reasonable cost assumption that could be used in future viability assessments.			

Overarching comments (non-policy)

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Turley on behalf of the University of Warwick (ID68)	Chapter 15	Y	Y	N	Y	Chapter 15: Infrastructure Delivery, Implementation and Monitoring With reference to Appendix 8 Monitoring Framework and the approach to monitoring of transport related policies AC1 to AC7, the University does not consider this level of monitoring to be effective, justified or consistent with national policy. The current suggested approach to monitoring is piecemeal and reliant on simple measurements against the IDP delivery, adoption of parking standards and travel plans. There is reference to monitoring bus patronage, single occupancy car use and rail patronage and footfall but with no clarity of what	Amendments should be made to Appendix 8 with regards to the indicators and targets for monitoring of policies AC1-AC7 to ensure greater depth of analysis and an effective monitor and manage approach over the Plan period. We suggest this includes the production of an annual Integrated Transport Monitoring Report, providing an evidence base for travel demand and travel behaviour change over the Plan period on a mode-by-mode basis to effectively	Noted, monitoring is undertaken in more detail by transport authorities and the AMR will cross reference to this.	No change

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						effective or justified measurement this will be graded against. The University believes that a much greater depth of analysis should be provided by the Council on an annual reporting basis, aligned with the Vision and Validate approach advocated in the NPPF. An Integrated Transport Monitoring Report should be produced on an annual basis and made publicly available to monitor travel demand and behaviour change on a mode-by-mode basis with KPIs aligned to the transport policies. This data can be analysed together with delivery of the IDP projects to allow a holistic and effective monitor and manage approach for the lifetime of the plan period. This level of monitoring is required to provide an on-going evidence base, measured insight of policy	monitor transport policy and targets.		

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						implementation and to facilitate continuous learning and adaptive changes to support sustainable and active travel.			
Enviro nment Agenc y(ID15)						Water Quality and Resources We note the Level 1 Water Cycle Study (WCS) 2024)) considers headroom capacity at the existing wastewater treatment works (WwTW) in Warwickshire in consideration of allocations in adopted local plans, residential and employment commitments, recent completions and windfall allowance. This does not appear to include the new allocations proposed as part of the Local Plan Review. We note Figure 11-3 illustrates the Coventry WwTW Catchments, with the majority of the area within the receiving catchment of Finham Coventry Sewage Treatment Works (STW). Appendix 9:		Noted. The IDP will be updated	Update the IDP

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						STW headroom assessment goes on to confirm that Finham STW has an amber RAG status due to an estimated 9% headroom exceedance. However, based on the STW comments, <i>'AMP8 quality scheme planned the scope of which will contribute towards environmental compliance'</i>. Where there is an identified constraint (amber or red) you should demonstrate that there is a solution (it may be already programmed, or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Water Company. The outcome of this may inform a 'phasing' policy within your plan where appropriate. It may also be necessary to produce an 'Infrastructure Delivery Plan' to set out any key milestones for waste water infrastructure			

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						upgrades and improvements. The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable. We note some reference to this in Part 2. Policy EM6 Redevelopment of Previously Developed Land. Note: Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). The NPPG refers to “ensuring viability and deliverability – pursuing sustainable development requires careful attention to viability and costs in plan making and decision making”. Plans should be “deliverable”. Bearing in mind the new allocations do not appear to be included in the			

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						headroom capacity assessment in the WCS, we would leave it to your Council to determine whether there is sufficient capacity or planned capacity in the receiving STW(s) to serve Coventry's growth (in combination with growth proposed in neighbouring councils where applicable), without causing significant deterioration of receiving water bodies. We welcome reference to the Water Framework Directive (WFD) in Policies CC1 Part B and EM6 and the emphasis on Sustainable Drainage Systems (SuDS) in Policy EM5 and the preference for nature-based solutions in Policy GE1. WFD reference of course applies to the whole plan area, not just the City Centre. In our opinion one of the key issues with WFD compliance in Coventry is diffuse source pollution from urban development. In particular, the Plan			

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						refers to the Rivers Sherbourne and Sowe, both of which are not achieving 'good' WFD status for phosphate. We encourage the need to manage phosphorus pollution which is possible via the policies set out in the Plan. We note Policy H7 refers to 'adequate sewerage connections'. As outlined previously, your Council may wish to include reference to the foul drainage hierarchy to provide clarity. Severn Trent's Water Resource Management Plan (WRMP), the Warwickshire Avon Abstraction Licensing Strategy and the Severn River Basin Management Plan (RBMP) have not been updated since the publication of the WCS. Therefore, the policy that was used to determine the 2024 WCS is still applicable.			

General comments (not submitted as policy-specific)

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General comments relating to Soundness/Legal Compliance/Duty to Co-operate									
Oxalis on behalf of Hallam Land (ID46)	Vision 2.1		N	N	Y	'The Vision' section (section 2) of the Local Plan is supported. Paragraph 2.1 and table 2.1 set out that Coventry city Council will create: "a city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow and new local jobs are created." (our emphasis in bold). Hallam support this approach, however detailed policies DS1, DS2,	Reasons for non-compliance in relation to supporting policies, and suggestions for modifications are set out in following 'Part B' forms, and an attached written representations document.	The policies are considered to support the vision.	No change

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						JE1, JE2, and GB1 do not support this vision, and result in the plan being unsound and not legally compliant for reasons set out in the additional submitted 'Part B' forms and attached written representations document. This is supported by a review of the Employment evidence base by Savills titled: Industrial and Logistics (I&L) Needs Assessment February 2025. Officer comment: See complete representation for additional information.			
Home Builders Federation (ID21)	Overarching	N	N	N	Y	<u>Overarching comments- Legal compliance and DTC not met</u> Impact of the Dec 2024 revisions to the NPPF 6. The new Government published a revised NPPF on 12th Dec 2024. This indicates that where a Plan is at Regulation 19 stage (after March 12th 2025) and the housing requirement meets less than 80% of local housing	Please refer to representation	The council considers its approach to be appropriate and its policies to be sound. In terms of the specific	No change.

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						need, as would be the case with this Plan, then authorities will be required to update their plan to reflect the revised local housing need figure and the revised National Planning Policy Framework prior to submission. 7. The HBF notes a new NPPF and new standard method for calculating housing need has been published just prior to this consultation on the Coventry Local Plan, and that this may have implications for the production of the Plan and the policies it contains. The transitional arrangements set out in the NPPF^{1} state that <i>‘for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025</i>		matters raised (eg growth levels, transitional arrangements, Duty to Cooperate, biodiversity), see the sections on specific policies.	

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						<i>and its draft housing requirement meets at least 80% of local housing need; [or] the plan has been submitted for examination under Regulation 22 on or before 12 March 2025; [or] the plan includes policies to deliver the level of housing and other development set out in a preceding local plan adopted since 12 March 2020 . . . '.</i> 8. The HBF considers that as currently proposed the Plan will be expected to comply with the NPPF 2024, whilst the Plan as reached Regulation 19 before 12th March, it has not included a draft housing requirement, and as such the Plan as proposed will not meet the 80% requirement. The HBF considers it is unlikely the Plan will be submitted before the 12th March 2025. The Government Response to the proposed reforms to the NPPF and			

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						other changes to the Planning system consultation^[2] provides a helpful flow diagram of the transitional arrangements, which is copied below (Figure 1). 9. The new NPPF therefore provides an important context on the wider Government's objectives around housing, which add further weight to the concerns we have raised about the failure of the West Midlands to fully grasp the challenges of meeting the housing needs and proactively plan to do so. We would suggest that the new requirements and the transitional arrangements underscore that changes are needed to this Plan in relation to housing monitoring and a new policy should be added which commits to an immediate review of the Local Plan. In our view such changes will be needed in order for			

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						the plan to be found sound, otherwise the issue of the unmet housing needs of Coventry will remain unaddressed for many more years, which in our view is not acceptable. 10. Figure One: Transitional Arrangements Flow Diagram (officer note: see full representation as too detailed to include here) 11. The new NPPF therefore provides an important context on the wider Government's objectives around housing, which add further weight to the concerns we have raised about the failure of the West Midlands to fully grasp the challenges of meeting the housing needs and proactively plan to do so. We would suggest that the new requirements and the transitional arrangements underscore that changes are needed to this Plan in			

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						relation to housing monitoring and a new policy should be added which commits to an immediate review of the Local Plan. In our view such changes will be needed in order for the plan to be found sound, otherwise the issue of the unmet housing needs of Coventry will remain unaddressed for many more years, which in our view is not acceptable. 12. We would ask that the Council fully consider the implications of the new NPPF and new standard method on their Plan. In HBF's view, the content of the new NPPF further underlines the importance of the Council taking efforts now to minimise the level of any unmet and unplanned for need in the first place. The Government's intentions to meet the housing needs of the nation in full, is very clear, and this is reflected in the transitional			

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						arrangements. We would therefore support the Council if they were to choose to take a pause to update their plan to reflect the new housing requirement. 13. Both the new (2024), and previous (2023) planning guidance are clear that Local Plans should be proactively planning for their area, which includes helping to address the housing crisis. However, the Coventry Plan is not contributing as much as it could, or should, be to helping to meet this key national housing policy goal. As such the Plan is not doing what it should be to make its contribution to achieving this national policy objective, as such it is currently unsound. New Information on BNG and LNRs			

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						14. As you may be aware the Government recently^[3] published additional Guidance on how Local Nature Recovery Strategies should be integrated with/feed into Local Plan Making^[4]. This guidance adds further weight to the comments we are making in relation to BNG policies in this Plan. We would encourage the Council to review the new guidance and fully consider its implications for this Plan. Plan Period 15. HBF note that it is intended for the reviewed Local Plan to run up until 2041, rather than the 2031 of the current Plan. The NPPF^[5] states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the			

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						strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. In recognition of the time that it can take to progress a new Local Plan through all its required stages, HBF consider it is unlikely that that this Plan would be adopted in 2025, and therefore suggests that the Council should considers extending the Plan period to ensure that a 15-year period is provided post adoption of the Plan. It will also be important for the evidence base to be consistent with the Plan Period. Duty to Cooperate 16. HBF is concerned that the Duty to Cooperate has not been met.			

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						17. We remain concerned that the lack of joined up plan-making across the West Midlands regional poses additional challenges for Local Plans in seeking to ensure the housing needs of Coventry and the wider West Midlands region are met in full. We remain disappointed that wider collaboration and cross-boundary planning on key strategic issues and plan-making has yet to be successful in the West Midlands area, despite this being greatly needed. 18. Plan-making is a fundamental part of a Local Authority's role and is essential to support the delivery new homes and jobs. Although we agree that it is important to ensure that there is an up-to-date Local Plan for Coventry, this must not be at the expenses of effective and pro-active plan-making to ensure the delivery of much			

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						needed housing. In HBF's view any refusal to fully grasp this issue is a failure of proactive plan-making and therefore unsound. It is therefore very disappointing that the Council is seeking to artificially reduce its housing numbers by progressing a Plan under the previous NPPF and standard method whilst at the same time not including the urban uplift which was an integral part of that system. 19. National Policy is clear is that 2014 household projections should be used. If the Council is unhappy with the standard method calculations under the NPPF in which is choosing for its Plan to be examined, it should withdraw the Plan and prepare a new one using the new standard method and NPPF as published on Dec 12th 2024. It cannot pick and choose which			

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						elements of the relevant national policy it wishes to apply, and which it does not. 20. HBF notes there is a significant interaction between housing issues across the wider South Warwickshire, Birmingham and Black County housing market(s), which are not being adequately addressed. We note the protracted and unfortunate history of unsuccessful collaboration around plan-making, which has led to the housing needs of the City Region remaining unmet and unplanned for. In the midst of a housing crisis, such an approach seems entirely unacceptable and will lead to significant negative impacts on both Coventry and its wider hinterland. 21. The previous Government made it clear that it supported the national target of 300,000 new homes per			

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						year, and the new Government has strengthened its commitment to housebuilding, with a policy aim of delivering 1.5 million homes over the next 5 years. This recognises the essential role new housing has in supporting economic growth, and the negative impacts that a lack of housing has on the local, regional and national economy. 22. The new Government has also reinforced the need for Local Plans to proactively plan for housing. Therefore, in the midst of a housing crisis and in light in the level of high housing need in Coventry HBF remain very disappointed that the Council has chosen not to review the Green Belt to address the housing and employment development shortfalls arising from the correctly calculated standard method including the urban			

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						uplift, choosing instead to artificially suppress the figure, which in fact leave a significant amount of their housing and employment needs unmet. Such an approach fails to adequately plan for the future development of Coventry, and as such is unsound. ¹ NPPF 2024 paragraph 234 ² https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/outcome/government-response-to-the-proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system-consultation#the-future-of-planning-policy-and-plan-making ³ On 19th Feb 2025			

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						4 https://www.gov.uk/guidance/plan-making and https://www.gov.uk/guidance/natural-environment#local-nature-recovery-strategies 5 NPPF 2023 Paragraph 22			
Siddhant Sharma (ID54)	N/A	Y	Y	N	Y	As mentioned above this document seems legally compliant. However, it is lacking soundness, as it doesn't give a detailed explanation as how to job will be created. Please see next page for further information (officer note: see respondent changes section)	To make the Coventry Local Plan review more sound there are certain things which I believe should be added in. For instance, the specific needs of vulnerable communities need to be addressed and this should be done by seeing what vulnerable communities exist, understanding their needs, and a plan of action as to how those needs can be met. There should be services that the vulnerable can access if needed. Vulnerability can span from bad mental health to someone being persecuted based on the 9 protected characteristics under the Equality Act 2010.	Comments noted. The expanded health and health impact assessments policy HW1 has regard to matters of both mental and physical health and an updated Supplementary Planning Document will also be prepared. The	No change

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							Additionally, from what I have understood I cannot see much mentioned in regards to the impact of climate change on future developments, as it is evident that global warming is taking a toll on the world. It is predicted that global sea surface temperatures will rise by 0.8°C, which could cause a magnitude of problems including flooding. A contingency plan must be made just in case Coventry has flooding in the future, this should include having the type of flooding defences used to keep the buildings, houses and people secure. Typically flood defences for a river tend to include embankments, floodwalls and vegetation. The benefits, drawbacks and the	comments on protected characteristics are noted and an Equality Impact Assessment has been undertaken of the plan. Climate change and flooding matters are accounted for through the EM (Environmental Management) policies of the plan.	

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							level of effectiveness of these defences should be included. The reason is rivers such as River Sherbourne run through the heart of Coventry which means surrounding areas could experience flooding in the future and the same goes for River Sowe as it is close to the Coventry City Centre. It is possible these rivers could flood in the future, therefore to mitigate the risk of this happening it is important to take into consideration the flood defences that can be used. Additionally, it is important to outline within the plan how and the type of sustainable building practices will be promoted to make sure structures don't fall or get damaged.	In terms of employment, the JE (jobs and Economy) policies are considered sound, flexible and supportive to enable the economy to adapt to change including technological change. In terms of the transport matters, these are addressed via the review of	

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							The Coventry Local Plan lacks strategies to attract new industries beyond the traditional industries. There are some examples of industries such as biotechnology, renewable energy, virtual reality, cloud computing, cyber security and online education. This will help create more jobs in Coventry and it will allow for economic diversification. The plan must include how these new industries and companies will be attracted to Coventry and the benefits and drawbacks of these industries. Additionally, sites or even brownfield should be allocated for these new companies and this should include the finer details such as the (project plan) cost of development, the time taken to	the Accessibility policies (AC). Where relevant there are hooks to other plans and strategies of the council and its partners as the scope of the Local Plan is only to deal with town planning matters. In terms of the 'finer detail', the specifics would (where	

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							make the buildings, the project scope, the amount of employment it will generate and how beneficial would it be to the local economy. Additionally, more content should be added in regards to the granular infrastructure, such as new roads, additional public transport and new bus stops. From what I understand the Coventry Local Plan largely focuses on large-scale developments but does not mention much about granular infrastructure developments. It is important to mention where in Coventry these granular infrastructure developments will be taking place, the benefits and what age group of people will benefit more from these	relevant to planning) be dealt with at the planning application stage.	

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							granular infrastructure developments in regards to the demography. Furthermore, there should be some idea of how many people will use public transport and at what point it is considered to be used at full capacity, it should also consider the number of road users at any given time. Additionally, it is important to take into consideration the durability and the materials used to make the new roads so the risk of potholes being created is reduced. Risk assessments should be conducted as well to make sure any granular developments go smoothly. Lastly, although traffic flow has been mentioned in the Coventry Local Plan, however from my		

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							understanding there is no mention of how any potential traffic congestion will be addressed in areas where new developments will be taking place. It is important to take into account how the traffic lights will be used, or will mobile traffic lights need to be used, perhaps for the time being if people were parking cars where the developments were taking place new places will need to be allocated to those people to park their cars without disrupting the flow of the traffic. Furthermore, alternative routes should be encouraged if certain sites are blocked off due to development taking place and there should be signs put in place to make it clear to car users that this is an alternative route. Additionally,		

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							public transport such as buses can be used more to prevent traffic congestion this may include the bus changing its route or learning additional routes to make sure it is not around areas of development whilst getting passengers to their destination by avoiding going near the developments. Additionally, it may be a good idea to have more park-and-ride services in Coventry so people do not take their cars with them. It is also a good idea to create schemes where carpooling and ridesharing are promoted. These strategies will be useful anywhere there is large-scale development taking place in Coventry in particular, the Coventry City Centre and in Baginton where the Gigafactory		

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							will be built. The benefits, drawbacks, and cost implications of any services or adjustments should also be mentioned in the Coventry Local Plan. Also, where and how much funding is coming for any services, adjustments or schemes should be outlined in the plan.		
Savills on behalf of Bellway Homes and Merton College(ID52)	Representation on Legal Compliance and Duty to Cooperate	N	Y	N	Y	3. Legal Compliance and Duty to Cooperate Legal Compliance 3.1. Bellway Homes and Merton College raise no issues with the legal compliance of the Local Plan Review. Duty to Cooperate 3.2. Bellway Homes and Merton College are concerned that the Duty to Cooperate has not been duly met by the Local Plan Review. 3.3. Local Planning Authorities are bound by the statutory duty to co-operate within the	Please refer to representation	These comments provide a summary of the detail contained within the representations to the specific policies and so the council's response is	No change

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	Introduction to Comments on Draft Policies and Conclusion					Localism Act 2011 and also the national guidance set out in the NPPF December 2023. Plan making bodies are expected to cooperate with each other when preparing or supporting the preparation of policies which address strategic matters including those policies of Local Plans. The NPPF states that these authorities should produce, maintain and update one or more statements(s) of common ground throughout the plan-making process. The Statement of Common Ground will form part of the evidence required to demonstrate compliance with the duty to co-operate. 3.4. Paragraph 26 of the NPPF (2023) refers to such cooperation as being “Effective and ongoing joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be		provided in the relevant sections.	

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						met wholly within a particular plan area could be met elsewhere.” (Our emphasis) 3.5. It is noted that Coventry City Council have published a Duty to Co-operate Statement to accompany the Regulation 19 consultation. This justifies that there has been a long history of engagement with Coventry, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford on Avon District Council, Warwick District Council, Warwickshire County Council and Hinckley and Bosworth Borough Council Local Planning Authorities. 3.6. With regards to housing growth, it is explained that “Coventry has always been clear that it did not expect any partners to deliver the cities uplift either as it would be arguing against this through the Local Plan process”. The Duty to Co-operate Statement then goes on to explain that Coventry commissioned a Review of Coventry’s Local			

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						Housing Need (June 2024), which concluded that the HEDNA remained valid – findings which were shared with partners and no disagreement raised regarding Coventry’s approach. However, the Duty to Co-operate Statement does not refer to any Statement’s of Common Ground with any Local Planning Authorities confirming agreement to Coventry’s approach, and as such it is not clear that there is compliance with the duty to co-operate on this matter. 3.7. Bellway Homes and Merton College are concerned that wider collaboration and cross-boundary strategic issues and plan making has yet to be successfully implemented across the West Midlands. It is concerning that there has been a failure to grasp matters such as the delivery of needed housing, resulting in a failure to demonstrate proactive plan making. 3.8. Additionally, the Duty to Co-operate Statement explains that Coventry only has a			

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						supply of 60 hectares of employment land against a need for 105 hectares of employment land. Apparently, Coventry informed other Local Planning Authorities that a Green Belt site was promoted for such use but rejected through site assessment work. 3.9. However, this leads to the Duty to Co-operate Statement setting out the following: <i>“Discussions are ongoing through CSWAPO and with the linked duty to Co-operate Group and associated Local Authorities in regard to this matter, but this currently remains an outstanding issue that has not yet been resolved In part this is because most partner authorities are at earlier stages of plan preparation. In Nuneaton and Bedworth Borough Council’s case, they are in examination and at the time hearings were underway the extent of any shortfall details from Coventry were unknown. The authority is continuing to work to develop an MoU with</i>			

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						<i>partners and working to establish Statements of Common Ground.” (Our emphasis)</i> 3.10. It is very concerning that no solution has yet been found at this Regulation 19 to resolve the deficit of 45 hectares of employment land required to meet Coventry’s own needs. It is considered that at this stage, the duty to co-operate would be failed given that this engagement has not effectively resulted in a solution to inform the production of a positively prepared and justified strategy. This conflicts with Paragraph 26 of the NPPF (2023). 3.11. It is considered that this failure to demonstrate the duty to co-operate on this matter also results in failing the test of soundness, meaning that the plan is unsound. 4. Comments on Draft Policies 4.1. It is noted that as part of the Regulation 19 consultation, a table has been published			

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						presenting the proposed policy updates and explanations for each of the proposed changes. 4.2. As such, the following section solely comments upon the draft changes proposed to the policies, and not the existing adopted policy wording. 4.3. Please note that Bellway Homes and Merton College only wish to comment upon certain policies, as set out below (officer comment: see individual representations in relevant policies). 6. Conclusion 6.1. In conclusion, these representations have been prepared by Savills on behalf of Bellway Homes and			

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						Merton College in response to the Coventry City Local Plan Review Regulation 19 Pre-Submission Consultation. 6.2. As set out above, Bellway Homes and Merton College are significantly concerned by the approach to meeting the needs of development, for both housing and employment land. There are very specific concerns that Policy DS1 will not meet overall development needs, and will not be found sound in accordance with Paragraph 35 of the NPPF. In summary Positively prepared – It is clear that the strategy under Policy DS1 does not meet the area's objectively assessed needs for housing or employment land, through not meeting the needs of the			

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						standard method with 2014 projects and 35% urban uplift, nor meeting Coventry's employment needs. ▪ Justified – Insufficient consideration has been given to Green Belt release, with limited consideration of reasonable alternatives. ▪ Effective – The Local Plan Review does not effectively meet housing or employment needs. ▪ Consistent with national policy – Inconsistent with the transitional arrangements, which suggest that the Local Plan Review should be assessed against the NPPF 2024, which requires the Green Belt to be reviewed to meet the areas full development needs. 6.3. Accordingly, it is considered that the Local Plan Review is unsound. For these reasons, Bellway Homes and Merton College object to the Local Plan Review as drafted.			

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						6.4. It is requested that the strategy is reviewed and full Local Plan update is commenced. It is suggested that land should be released from the Green Belt, such as Land at Rookery Farm, Coventry. This site remains readily available for development, and could significantly help to meet Coventry's housing needs. Officer comment: Please see full representation for full report and site location plan			
Stantec on behalf of Catesby Estates (ID56)	Introduction, NPPF, and General Comments	N		N	Y	1 Introduction 1.1.1 Stantec is instructed by Catesby Estates PLC ('Catesby Estates') to submit a representation to the Coventry City Council Local Plan Regulation 19 (Proposed Submission) Consultation (hereafter referred to as 'the Proposed Submission Plan') in respect of its land interest at Land at Gibbet Hill Road ('the Site') - land at Gibbet Hill Road	Required Changes 3.1.6 The plan-period should accordingly be extended by a year to cover this eventuality, including the resulting implications such as planning for an additional years' worth of development requirements (housing and employment).	Noted, however the plan period is considered appropriate.	No change

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	ments					has previously been promoted by L&Q Estates. However, Urban&Civic Plc, which includes Catesby Estates, acquired L&Q Estates from L&Q Group as of 6th August 2024. The Site is accordingly now being brought forward by Catesby Estates in partnership with the landowner. 1.1.2 This Site lies cross-boundary with Warwick District, with approximately 2.3 hectares being located within Coventry City and 21.4 hectares within Warwick (see Site Location Plan at Appendix 1). Catesby Estates is working with the landowners to bring forward the Site and has promoted the Site through both the Coventry Local Plan Review and the South Warwickshire Local Plan. Stantec also submitted a response to the University of Warwick Draft Campus Framework Masterplan Supplementary Planning Document consultation held by Warwick District Council in June 2024.			

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						1.1.3 For reference, the Site in its entirety has capacity for around 500 dwellings, set within a framework of open spaces and is identified within a wider “Strategic Growth Location” (SG01 South of Coventry Group) within the Regulation 18 Part 2 version of the South Warwickshire Local Plan that is currently undergoing consultation until 7th March 2025 (see extract at Appendix 2). 1.1.4 The Vision Document included at Appendix 3 sets out more information relating to the site, in conjunction with the Concept Masterplan at Appendix 4. The main vision seeks to create a community based upon the principles established by the 20-minute neighbourhood to help address the challenges of climate change and seek to improve the health and wellbeing of all who live in Coventry and South Warwickshire. The Site can make an important contribution to meeting housing requirements and can be			

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						built out relatively quickly given it is not reliant on significant infrastructure. 1.1.5 This representation comments on the relevant policies of the Proposed Submission Plan as well as relevant documents within the evidence base as follows: • Overall Levels of Growth Background Paper (November 2024) • Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (November 2022) • Review of Coventry's Local Housing Need (June 2024) • Housing Background Paper (November 2024) • Housing and Economic Land Availability Assessment (November 2024) • Green Belt and Green Environment Background Paper (November 2024) • Green Belt Technical Update Study (July 2024)			

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						• Sustainability Appraisal and Strategic Environmental Assessment Report (October 2024) 1.1.6 This representation will have the underlying aim of ensuring that all policies are legally compliant and align with the ‘tests of soundness’ as outlined at Paragraph 36 of the National Planning Policy Framework (‘NPPF’). These include the following: • Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; • Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; • Effective – deliverable over the plan period, and based on effective joint working on cross-			

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						boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant. 1.1.7 As drafted, Catesby Estates believes that the Proposed Submission Plan is not sound as: -The plan period of 2021-2041 is unlikely to cover a minimum period of 15 years from the date the Local Plan Review will be adopted (likely to be 2026). This is not consistent with National Policy. -The proposed overall level of housing growth fails to meet Coventry's Local Housing Need and fails to take into account reasonable alternatives, including meeting the Council's own affordable housing need or unmet need arising from elsewhere. It is therefore not positively prepared or justified. The overall			

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						level of growth is also not consistent with national policy in its approach to quantifying an overarching housing requirement. -There is a distinct lack of evidence to suggest that the Council has complied with the duty to cooperate, such as statements of common ground with any stakeholders, including neighbouring authorities. -The Council's approach to local green space is unsound as it is not Justified or Effective, as it is not based upon accurate evidence. 1.1.8 As such, Catesby Estates wishes to attend the Local Plan Examination Hearing Sessions in order to further explain the modifications that are considered necessary in order for the Plan to be found sound. 2 National Planning Policy Framework (December 2024) 2.1.1 The Government published and updated version of the National Planning Policy			

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						Framework ('NPPF') in December 2024, with a further correction update in February 2025. 2.1.2 This was accompanied by changes to the Standard Method for calculating housing need, which resulted in revised Local Housing Need figures for the majority of local planning authorities within England. 2.2 Transitional Arrangements 2.2.1 The updated NPPF contains transitional arrangements for the purposes of plan-making which are set out at Paragraph 234 onwards. 2.2.2 Paragraphs 234 to 237 state: 234. For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: <i>a. the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025,</i>			

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						<i>and its draft housing requirement meets at least 80% of local housing need;</i> <i>b. the plan has been submitted for examination under Regulation 22 on or before 12 March 2025;</i> <i>c. the plan includes policies to deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020;</i> <i>d. the local plan is for an area where there is an operative Spatial Development Strategy and the local plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025; or</i> <i>e. the plan deals only with minerals and/or waste matters and has reached Regulation 19 on or before 12 March 2025; or has been submitted for examination under Regulation 22 on or before 12 March 2025.</i>			

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						235. Where paragraph 234a, b, c, d or e apply, the plan will be examined under the relevant previous version of the Framework. 236. Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need. 237. Those local plans that reach Regulation 19 (pre-submission stage) on or before 12 March 2025 and whose draft housing requirement meets less than 80% of local housing need should proceed to examination within a maximum of 18 months from 12 December 2024, or 24 months of that date if the plan has to return to the Regulation 18 stage.			

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						2.2.3 In relation to the above, Coventry City Council is progressing its Local Plan Review under Paragraph 234a. 2.2.4 In this regard, the revised Local Housing Need figure for Coventry City derived from the new Standard Method is 1,388 dwellings per annum. The housing requirement figure contained within the Regulation 19 Proposed Submission Plan is 1,455 dwellings per annum and the draft Plan accordingly complies with the provision of Paragraph 234a. 2.2.5 The Proposed Submission Plan will accordingly be examined under the relevant previous version of the Framework (the 2023 version of the NPPF). 2.3 National Planning Policy Framework (2023) Plan-Making and Soundness 2.3.1 Paragraph 16 of the NPPF confirms that Plans should:			

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						<i>a) be prepared with the objective of contributing to the achievement of sustainable development;</i> <i>b) be prepared positively, in a way that is aspirational but deliverable;</i> <i>c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</i> <i>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</i> <i>e) be accessible through the use of digital tools to assist public involvement and policy presentation; and</i> <i>f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).</i>			

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						2.3.2 Paragraph 35 sets out the tests which Local Plans are assessed against at examination. Plans are 'sound' if they are: <i>"a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</i> <i>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</i> <i>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework</i>			

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						<i>and other statements of national planning policy, where relevant.”</i> Duty to Cooperate 2.3.3 The NPPF also reaffirms the duty of local planning authorities to cooperate with each other on strategic matters that cross administrative boundaries and it sets out that effective strategic planning across local authority boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience 2.3.4 Paragraph 27 goes on to confirm that, in order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating			

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						to address these. These should be produced using the approach set out in national planning practice guidance, and be made publicly available throughout the plan making process to provide transparency. 2.4 Provision of Homes 2.4.1 To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance, unless exceptional circumstances justify an alternative approach. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. 2.5 Green Belt 2.5.1 Paragraph 146 confirms that authorities may choose to review and alter Green Belt			

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						boundaries where exceptional circumstances are fully evidenced and justified. 2.6 Planning Practice Guidance 2.6.1 Planning Practice Guidance (PPG) provides further advice on Plan making and how these tests can be met. Throughout these representations, we set out whether we consider specific policies comply with the tests of soundness as set out above. 3 General Comments 3.1 Plan Period 3.1.1 The Local Plan Review relates to a period 2021-2041 (the Local Plan Review itself refers to a period 'up to' 2041 i.e ending 31st December 2040). In this regard, Paragraph 22 of the NPPF confirms that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.			

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						3.1.2 The Council's latest Local Development Scheme (December 2024) indicates that the Local Plan Review is expected to follow the below timetable: Regulation 19 Consultation – January to March 2025 (Now) Submission to the Secretary of State for Examination – April to June 2025 Examination in Public – July to September 2025 Adoption – October to December 2025 3.1.3 Whilst it is appreciated that the Regulation 19 consultation is currently taking place in accordance with the anticipated timetable, it is considered that the assumption that the Plan will be submitted, examined and adopted by the end of 2025 is optimistic (particularly given the content of the representation which documents that the Plan is currently unsound).			

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						3.1.4 It is more likely that, if the Plan is found sound at examination, it would be following a series of modifications that would require further consultation, meaning the adoption date would be pushed back into 2026. 3.1.5 As such, the plan-period would only cover a period of 14 years; 2026 to 2040 inclusive, which is not consistent with National Policy. Officer comment: Please refer to full representation report for appendices, site plans and further information			
Sally Rees (ID50)	All	N	N	N	Y	Introduction I submit this document in response to the Coventry City Council Local Plan under the Regulation 19 Consultation and object to much of the content on the grounds that it fails to meet the requirements of national planning policy, overestimates housing need,	Final Recommendation: Plan Must Be Revised The current Plan is unsound and requires the following revisions: 1. Adjust housing need calculations to align with the New Standard Methodology.	The council's brownfield-first strategy, site selection process and policies are considered to be sound.	No change

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						and disregards environmental and infrastructure concerns. My key objections are as follows: 1. The Housing Need Assessment is Flawed 2. Excessive Land Allocation and Failure to Prioritize Brownfield Sites 3. Lack of Infrastructure Planning and Coordination 4. Neglect of Affordable Housing Priorities 5. Failure to Consider a Dispersed Housing Strategy 6. Significant Environmental and Biodiversity Impact 7. Failure to Adhere to the Duty to Cooperate 8. Exceptional Circumstances Warrant Returning Land to the Green Belt These points are substantiated by policy references, recent data, and legal planning principles. 1. The Housing Need Assessment is Flawed • The Council's housing need figure of 1,455 dwellings per annum (dpa) is inconsistent with	2. Reduce excessive land allocations. 3. Prioritize brownfield development over greenfield expansion. 4. Ensure infrastructure is planned and funded BEFORE major development. 5. Guarantee that new developments include a significant proportion of affordable housing. 6. Implement a dispersed housing strategy. 7. Reinstate key areas to the Green Belt to protect biodiversity.		

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						the latest New Standard Methodology (NSM), which requires only 1,388 dpa. • ONS 2021 Census data confirms past population estimates were significantly overstated, largely due to incorrect assumptions about student populations. • The National Planning Policy Framework (NPPF, Paragraph 61) mandates that local plans be based on the most up-to-date and reliable evidence. Conclusion: The Plan is based on an exaggerated housing need figure that does not reflect Coventry's actual demographic trends and should be revised accordingly. 2. Excessive Land Allocation & Failure to Prioritize Brownfield Sites • Coventry's plan allocates 31,493 dwellings, despite only 27,760 dwellings being needed over the plan period. • With additional windfall developments and student housing adjustments, there is an			

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						excess of 7,933 dwellings, making further land allocations unnecessary. • NPPF Paragraph 119 requires councils to make the best use of brownfield land before developing greenfield sites. Coventry's plan ignores this requirement. Conclusion: The Council's over-allocation of land contradicts national policy and must be reduced to align with actual housing need. 3. Lack of Infrastructure Planning and Coordination • The plan fails to provide a clear strategy for infrastructure to support large-scale housing development. • Key areas of concern include: - o Road congestion and lack of sustainable transport options. - o Overstretched healthcare services (GPs, hospitals, and emergency care). - o Limited school capacity to support new residential areas.			

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						- NPPF Paragraph 20 mandates that local plans include infrastructure planning, yet Coventry's plan lacks a coherent strategy. Conclusion: The Plan is legally unsound due to insufficient infrastructure planning. 4. Neglect of Affordable Housing Priorities - The Plan does not ensure that new housing developments cater to low-income families and key workers. - Developers prioritize high-profit developments over social housing, exacerbating affordability issues. - NPPF Paragraph 62 states that plans must ensure housing meets the needs of different income groups, which this plan fails to achieve. Conclusion: Coventry City Council must amend the plan to prioritize affordable housing. 5. Failure to Consider a Dispersed Housing Strategy			

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						- The Plan focuses too heavily on large developments, causing: - Infrastructure overload in concentrated areas. - Disconnection from existing communities. - Reliance on national developers rather than supporting local builders. - A dispersed housing approach would: - Spread development across multiple smaller sites. - Reduce strain on local services. - Support local businesses and construction firms. Conclusion: The Plan should incorporate a dispersed housing model to ensure more balanced and sustainable development. 6. Significant Environmental & Biodiversity Impact - The Plan proposes development on environmentally sensitive sites, including: - Keresley Mere, a rare wetland habitat with fluctuating water levels essential for biodiversity.			

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						o The Alders and Bunsons Wood, which are ancient woodlands with protected species. o Pikehorn Wood, classified as an important long-established woodland. • NPPF Paragraph 174 requires planning authorities to protect and enhance biodiversity, yet the Plan fails to do so. Conclusion: Development on these sites violates national policy and should be reconsidered. 7. Failure to Adhere to the Duty to Cooperate • Coventry City Council should not absorb excess housing requirements from Warwickshire if it means sacrificing Green Belt land. • Any additional housing demand must be accommodated within Coventry's existing urban areas. • South Warwickshire development proposals SGO1-3 should be reconsidered in light of Coventry's surplus housing supply.			

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						Conclusion: The Plan must not use Coventry's Green Belt to offset Warwickshire's housing obligations. 8. Exceptional Circumstances Warrant Returning Land to the Green Belt • The 2021 Census confirmed that the original basis for Green Belt removal was flawed. • The NPPF (Paragraph 138) allows for Green Belt land to be reinstated when the original removal was unjustified. • Specific areas for reinstatement: - o Hounds Hill – a natural buffer zone. - o The Alders & Pikehorn Wood – irreplaceable ancient woodlands. - o Keresley Mere & adjacent fields – crucial for biodiversity. • Restoring this land to the Green Belt aligns with national policy and environmental obligations. Conclusion: Land previously removed from the Green Belt should be reinstated to protect Coventry's natural heritage.			

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Policy Addition requests (general)									
Joscelyne Bigham(ID23)	N/A	N	N	N	N	The Coventry Historic Landscape Characterisation (2013) seems very outdated. Should it be reviewed? Should Longford not have its own Historic Landscape Characterisation rather than it being split between HLC Area 24 (Foleshill) and HLC Area 41 (Alderman's Green). There appears to very little reference to its history and character (including association with Coventry Canal), locally listed buildings, Grade II listed buildings, public houses and places of worship (Former Salem Baptist Chapel – House of Empowerment, St Thomas', Union Place Baptist Church – Longford Baptist Church). Historic England: 1418247, 1076617 Should Longford be considered as a conservation area in its own right or could the Coventry Canal Conservation Area be extended to cover a wider area within Longford so that includes properties within Longford Square, Hurst Road, Longford	Review the conservation status of Longford. Consider making it into a conservation area and update The Coventry Historic Landscape Characterisation document	These matters are beyond the scope of the Local Plan	No change

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						Road/Bedworth Road, Oban Road, Woodshire's Road, Rowley's Green Lane and Wilson's Lane? The area has already lost important sites such as Southfields, Vine Cottage, Manor House Farm and a garden that had a design supervised by Sir Joseph Paxton (1803-65). It is of concern that there could be further losses if Longford's character is not officially recognised.			
Stride Treglown on behalf of Coventry university group (ID61)	Suggested new policy (CC2)	Y	Y	N	Y	Suggested supportive text for inclusion with the Local Plan prior to a new Policy CC2 Coventry University Group (the University Group) has been one of the fastest growing higher institutions in the Country. Its recent significant investments, and future development ambitions across their extensive City Centre campus are the result of years of successful partnership working between the University Group and the Council: a relationship which both parties wish to	This representation is in the interests of creating a positive, justified, effective and deliverable plan. Coventry University Group (CUG) requests a new policy and associated supportive text, as outlined above, is inserted after Policy CCC1 (Parts A-E) on page 173.	Comments noted however it is considered that the policies of the reviewed plan already recognise and support the university and its role,	No change

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						develop throughout the Local Plan period. Accommodating ongoing University Group investments plans is a key City Centre objective of the Local Plan and spatial strategy for the area. According to a recent Economic Impact Assessment report (EclA), data from 2021-22 showed that the University Group generated an annual Gross Value Added (GVA) of c£1bn nationally and had a significant economic impact across the City and sub-region, with around a third of the generated GVA (£320m) benefiting Coventry alone. Moreover, as per the data, 1 in every 20 jobs in the City could be traced back to the presence the University Group and for every 4 direct on-campus jobs, a further 3 were supported across the city. As such, the University Group is a significant player in the Council's ambition to increase the economic prosperity of the city and region		so there is no need for an additional policy CC2	

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						and promote job and employment opportunities within growing sectors. The Economic Impact Assessment has highlighted the University Group as benefitting from: close partnerships with a range of stakeholders; an open attitude to 'doing things differently'; bringing a trans-disciplinary mindset to tackling socio-economic challenges; and being responsive to local needs through an embedding of the University Group and its estate in the city. It is recognised that the University Group is actively engaged in academic programmes and research initiatives in support of multiple sectors of activity and it operates in a commercial and competitive UK, and increasingly, global marketplace. Its success, in part, rests on its ability to collaborate with industry, enterprise and the public sector. The range of facilities required to support such a large and rapidly expanding University Group			

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						are ever-changing and it not only continues to adapt to changing research and academic requirements, but also responds to new opportunities to accommodate regional, national and international activities which support inward investment and spend within the city. The University Group is a major landowner within and around the City Centre and has a continued focus on increasing space utilisation for teaching and learning in order to deliver operational efficiencies. This informs the degree to which new buildings are required to meet growth projections and, in turn, facilitate selected redevelopment opportunities for alternative uses across the city centre. For example, the University Group acquired the former Civic Centre from the Council in 2015, a site offering alternative mixed-use opportunities which align with the wider policy objectives of strengthening the role of			

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						the City Centre as a vibrant location to live and work (CC1 Part E). Redevelopment opportunities will be delivered as part of a City Centre 'placemaking agenda', centred on a coherent and deliverable University Campus Masterplan which will have regard to the University Group's Estate Strategy, adopted in 2022. The University Group developed an up-to-date Travel Plan and Transport Strategy Action Plan in 2023. Working with the Council, the University Group will contribute towards sustainable public realm investments and deliver active travel measures designed to reduce the impact of vehicular traffic within the city centre. The University Group has innovative and transformational learning and teaching approaches to academic delivery, which impacts upon space needs. The importance of facilitating social and group learning;			

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						delivering student (and staff) support services and an increased awareness of a sense of identity for university students continues to shape new initiatives and opportunities. These include the creation of clusters of 'Academic Excellence' where a shared asset culture across general teaching and specialist spaces is being delivered. Changing pressures upon space continue to shape capital projects and maintenance works across the University Group estate. The creation of the new University Square on the site for the former Alan Barry Building, the completion of Starley Gardens along Cox Street and the new Delia Derbyshire Arts and Society Building represents significant investments by the University Group. Combined, these developments deliver quality academic buildings and public realm enhancements for the City. By means of a new Campus Masterplan, the University Group will deliver new academic,			

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						public realm and commercial development opportunities within its Cathedral Quarter area aligned with adopted Local Plan policies. The University Groups 8ha Technology Park lies in the south of the City Centre. The University Group will continue to invest in communal amenities and facilities to serve its commercial tenants and look to diversify its tenant mix to reflect changes and growth in new economic and creative industries, including partnerships with public and private organisations. The retention of university graduates who can make a lasting and positive high-value impact in the city and sub-region represents an important part of the Council's economic strategy. This requires a choice in affordable housing and new housing models, such as co-living and Build to Rent schemes, which reflect a changing socio-economic demographic across the City. Private sector developers			

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						have delivered significant Purpose Built Student Accommodation (PBSA) within the City in recent years. The University Group does not anticipate ongoing investment in traditional PBSA, but may wish to deliver specialist new housing approaches, including co-living and built to rent schemes to meet its long-term operational needs. In terms of its sustainable development objectives, the University Group has secured £13m grant funding to contribute towards a City Centre District Heating network. This will play a role in the University Group's ability to meet Net Zero Carbon ambitions by 2030. Aligned with wider environmental objectives, the Council will require the University Group to contribute towards connecting wider green and blue infrastructure networks as part of an ongoing greening initiative across the City Centre.			

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						The University Group's core estate is located across four defined City Centre Character Areas (Cathedral and Cultural, Civic, Parkside and University and Enterprise). Lying slightly outside this core estate is the Cultural Institute, a £43m joint venture with the Council, in the Mixed-Use Core area and the University Group's Bishop Gate accommodation, which lies in the Northern Regeneration area. The extent of the University Group's landholding within the City Centre, its economic impact across the sub-region and opportunities to support managed growth through the Local Plan period underpins the need for a bespoke Local Plan policy approach. This approach recognises the educational, commercial, economic, environmental and community benefits which can be unlocked by the University Group working in partnership with the Council through a City Campus Masterplan.			

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						The inclusion of a University Group policy has regard to the provisions of Policy CC1 (Parts A-E) and acknowledges the defined boundary of core University Group land interests and future development ambitions. The Campus Masterplan will contextualise future University Group planning applications and will be kept under annual regular review in collaboration between the Council and University Group. (see also para 8.15 pp83)". Suggested New Policy Policy CC2: Coventry University Campus Part A: Campus Masterplan The Council recognises the role of Coventry University Group (the University Group) in supporting city-wide economic prosperity and promoting job and employment opportunities across the region. The University Group will			

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						continue to develop and invest in its city centre campus to maintain their position as one of the fastest growing higher education institutions in the UK. The University Group will continue to play a role in the wider City Centre placemaking objectives of the Council to strengthen the identity and integration of the University Group within the city. The University Group shall remain committed to the continued investment of its estate portfolio to provide education, research, regeneration, environmental and economic benefits, and ensure the student experience is enhanced through a well-managed, high-quality and adaptable portfolio of buildings and spaces. In collaboration with the Council, the University Group will prepare a Campus Masterplan which will capture academic and University Group - initiated alternative use redevelopment opportunities. The Masterplan			

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						will demonstrate how proposals will lead to cohesive integration within the City Centre. The Masterplan will help contextualise future planning applications submitted by the University Group over the life of the Local Plan period and will support the development strategy set out in Policy CC1 (Part A). Part B: Development principles within the Campus Masterplan Area Planning applications submitted by the University Group within the Campus Masterplan area shall be determined in accordance with the provisions of Policy CC1 (Parts A-E) and the following development principles: a) Integrate University Group operations within the fabric of City Centre; b) Strengthen safe and legible pedestrian and cycling connections between each			

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						character area where the University Group has a presence; c) Incorporate facilities and the infrastructure required to support the new academic, research, commercial and ancillary developments; d) Deliver biodiversity net gains (including new habitats) as part of a City Centre greening strategy; and, e) Support the delivery of other planning objectives for the area in which it is proposed. Where land and/or buildings are released for alternative (non-University Group) uses, development proposals will be supported where they demonstrate the contribution the scheme will make towards employment, health, community and city-centre residential-led mixed-use proposals (as appropriate) in accordance with other policies of the Local Plan.			

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						University Group proposals for specialist housing schemes will be acceptable where they are in compliance with Policies H12 and H13 of this Plan.			
Land Promotion submissions to Regulation 19									
Stante c on behalf of HGIT Centra l Covent ry Ltd (ID57)	Intro ducti on, The Site and Surro unds, LPR – Cons ultati on Resp onse (gen			N	Y	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	Please refer to representation	Noted. Whilst the site has not been allocated its continuing employment use and potential for modernisation are supported as part of the retention and recycling of existing	No change

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	eral) and Summary and Conclusions					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.		employment stock and this accords with the employment policies of the plan.	

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						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. Officer comment: See full representation report for plan & further details 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			

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						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. 4 Local Plan Review – Consultation Response 4.1 Strategic Considerations and Policies			

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						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. 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.			

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						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			

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						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.			
Stantec on behalf of Catesby Estates (ID56)	Land at Gibbet Hill Road	N		N	Y	7 Land at Gibbet Hill Road Site Description 7.1.1 The Site is located approximately 5km to the southwest of Coventry City Centre and directly south of Warwick University campus. The Site in total comprises approximately 23.7ha land, with approximately 2.3 hectares being located within Coventry City and 21.4 hectares within Warwick District. The entirety of the site is currently in agricultural use (arable farming). 7.1.2 The main access point into the Site is off Gibbet Hill Road, with a secondary access track running from the southwest corner of		Noted. The council considers its site selection strategy to be sound. It is noted that the site falls within Warwick DC's area and it will be determined via the South Warwickshire	No change

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						the Site (Cryfield Grange Road) along and up to the northwest corner (Gibbet Hill Road). 7.1.3 The Site is located within the Green Belt but is immediately adjacent to the built-up area of Coventry which is to the north-east. Context 7.1.4 The Site is surrounded by built form comprising of residential development in the form of detached properties with large independent drives. In addition to this there is also the presence of education facilities which are currently owned and occupied by the University of Warwick. 7.1.5 The Site is well located in relation to the surrounding strategic highway network. Gibbet Hill Road provides access directly to the University of Warwick along with the associated halls of residence for students. The Site is also in an accessible location to the A429 (Kenilworth Road) offers a direct link		Local Plan process	

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						into Coventry City Centre (to the north) and Kenilworth (to the south). 7.1.6 The Site has access to a sustainable transport network, which is surrounded by a number of bus stops, with the closest bus stop located on the northern boundary of the Site along Gibbet Hill Road; bus services 11 Platinum, 12X Platinum, U1, U1 V, U1A and U1AV all operate from this bus stop. Below is a schedule for the bus services: - Bus service 11 Platinum operates from Leamington Spa to Coventry (via University of Warwick and Kenilworth) and vice versa; this service runs frequently every 20 minutes. -Bus service 12X Platinum operates from Canley to University of Coventry and vice versa; this service runs frequently every 30 minutes. -Bus services U1, U1A, U1 V and U1A V all operate from Warwick Gates to University of Warwick and vice versa; these services run frequently every 30 minutes.			

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						-Bus service X17 operates from Warwick to Coventry and vice versa; this service runs frequently every 30 minutes. Combined, the bus services offer a sub-5 minute frequency. 7.1.7 Canley Station is located approximately 3km northeast of the Site, whilst Tile Hill is located approximately 3.5km northwest, both of which provide connections to key local and national destinations. 7.1.8 There are a number of facilities and services in close proximity to the Site (as further detailed within the submitted Vision Document), but there are various uses such as the University of Warwick, café, sports facility, shop and primary school within a 15-minute walk. 7.1.9 A public right of way is present beyond the site to the west which is known as Connect2 Kenilworth; this path is also commonly used by cyclists. There may be the			

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						opportunity to enhance the existing PRoW and improve pedestrian and cycle connectivity in the area by creating new linkages and recreational routes as part of the proposals. There is a stream which runs along the complete western boundary of the Site which also provides an opportunity to enhance the marine biodiversity. Planning Policy Designations 7.1.10 The Site falls predominantly within Warwick District Council which is currently governed by the Warwick District Local Plan 2011-2029 (adopted September 2017). However, as described above, Warwick District Council is currently preparing a new local plan in conjunction with Stratford on Avon Council, known as the South Warwickshire Local Plan ('SWLP'). The SWLP identifies the site as falling within Strategic Growth Area SG01 (South of Coventry Group), which comprises a potential large strategic urban extension to be refined through the			

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						forthcoming Regulation 19 version of the SWLP. Landscape and Visual Impact 7.1.11 As set out above, the technical evidence submitted alongside these representations confirm that the Site can be accommodated in both landscape and Green Belt terms with suitable landscape-led design (see Landscape and Visual Appraisal at Appendix 5). Highways and Access 7.1.12 The submitted Transport and Highway Technical Note (Appendix 6) and Vision Document shows that the Site enjoys various opportunities and sustainable travel options for future residents. There are a also a number of employers and facilities within the local area. An access off Gibbet Hill Road is also feasible. A review of opportunities for vehicular access has been undertaken and demonstrates that two points of access to the			

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						Site, which are technically compliant, are deliverable off Gibbet Hill Road within land forming part of the Site or the adopted Highway. Ecology 7.1.13 The submitted Ecological Constraints and Biodiversity Net Gain Feasibility Report (Appendix 7) confirms that the proposed development can meet the Biodiversity Net Gain Good Practice Principles for Development Concept Plan 7.1.14 The submitted concept plan shows a landscape-led approach which utilises the exiting topography of the Site to provide approximately 500 new high quality and sustainable homes. The concept masterplan focuses on health and wellbeing with a range of features being proposed alongside a network of healthy green streets to promote active travel			

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						Officer note: Please refer to full representation report for appendices, site plans and further information			
General Letters									
Allesley Parish Council (ID1)	All	N	Y	Y		APC cannot find where to submit their comments to the Local Plan so have included them here: General comments: Further to detailed assessment work which considered how development needs might be accommodated (contained in the Background Paper on Growth Needs, the Housing and Employment Background Papers and the HELAA), no further releases of		Comments are noted. The council considers the plan review to be sound, and the issues raised in this representation would be addressed by	No change

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						Green Belt are proposed in the Coventry Local Plan which would require a revision of GB1. The only changes to GB1 are therefore proposed to be as follows: - To split the policy into Green Belt (GB1) and Local Green Space (new policy GB3) - To ensure policy wording reflects that of national policy. - To remove the list of sites which were listed in GB1: this is not necessary now as the designations were made through the adoption of the 2017 Plan and these are now reflected on the adopted Policies Map. No changes to these designations are proposed through the Local Plan Review. 2. In terms of future Green Belt policy, at the time of writing the Background Paper the Government were		policy where applicable. Changing of administrative boundaries is outside the scope of the plan review.	

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						proposing to introduce a new designation of “Grey Belt” which could potentially accommodate new development where a series of tests were met. Notwithstanding this, the principles of ‘brownfield first’ and making ‘effective and efficient use of brownfield’ looked set to remain. 3. Requirement for land south Parish side of the A45. We believe this is the historic reference to the land required to "bring forward" the Eastern Green SUE, by building the road access over the bridge and associated roundabout and slip roads. This land was NOT in Coventry CCs initial request to remove land for the development from the Greenbelt. Further creep our way was discussed at the Government Planning Inspector’s meetings, however, Colin Knight and other CCC Officers stated there were no plans to either spur off the new roundabout with a new road running north towards Keresley/M6 or bring further			

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						land forward for housing etc. The large (now remote and isolated field adjacent north of the roundabout also bordered by Brick Hill Lane and Oak Lane is owned by the same landowner who sold the land for the SUE. We understand that the same developer as the SUE has the first option on this land. 4. Re Greenbelt/protected green spaces. It is our understanding that the "protected green spaces" was an enhancement to isolated pockets of non Greenbelt land, not a higher level of protection for Greenbelt. If this is not correct then we would request for renaming/redesignation. 5. Eco protection and mitigation. Elsewhere in the Plan it transpires that even areas of high ecological importance CAN be built on if there is a strong enough case, with the developers, simply paying to offset the eco damage caused at a specific site elsewhere (if biodiversity gains cannot be made onsite)			

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						6. As the plan covers land use and housing over the next decade plus, Allesley parish Council strongly hope, desire and intend to redraw our Parish boundaries and become a part of North Warwickshire should be formally recorded and included in the review. The City Council need to be aware that there is a strong possibility that residents will vote for change. 7. Our concern, as mentioned in the supporting material of the recent building surge and now oversupply of purpose built student accommodation in the City. It is noted that providers are offering incentives to students and less desirable accommodation (due to location or quality) are under occupied to the point the owners may be considering exiting the student market and repurposing the units.			

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						8. We disagree with the Council's transport proposals, particularly their unrealistic assumptions regarding the modal shift expected within the City. Just because the City Council believe that more people will take up cycling does not mean that it is appropriate for everyone. Having a car is more than just aspirational in this day and age, especially in a rural area such as ours, and forcing people to do otherwise will drive people and business away from the City. 9. There is no mention of the fact that Allesley Parish is currently consulting on a boundary review which would see the parish area, containing most of the city's remaining green belt, leaving the jurisdiction of Coventry to become a parish within Warwickshire. This should be taken into consideration when drawing up the new local plan.			
NHS Covent	All	Y	Y	Y	N	I write on behalf of NHS Coventry and Warwickshire Integrated Care Board (ICB) in		Comments noted and	No change

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ry and Warwickshire Integrated Care Board (ID40)						response to the publication of the above document (hereafter referred to as the Local Plan). The ICB is grateful to Coventry City Council for the opportunity to provide comments. Its focus in doing so is to ensure that primary medical care (General Practice) infrastructure is adequately provided for within the Section 106 framework and that funding of future primary medical care provision and access is not compromised through housing development and population growth. The ICB recognises that the Local Plan development process sets out a clear way to ensure the planning policies that the council will use to meet future development needs in terms of housing and job growth, reflect the views of the local population and key partners. The proposed plan estimates that the local housing need for Coventry for the period 2021 – 2041 is 29,100 (1,455 per annum), all of		CCC will continue to work constructively with the ICB through the Duty to Cooperate and beyond including in regard to developer contributions where applicable	

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						which will be delivered fully within Coventry's administrative area. Coventry and Warwickshire Integrated Care System (ICS) is projected to experience notable population growth. According to Coventry and Warwickshire Estate Strategy, the population is expected to increase by 14% by 2040, reaching nearly 2,242,536 residents. As the council will already be aware, the population arising from any new housing provided in Coventry will place increased demand upon healthcare services within the area, including primary medical care services provided within the Coventry City administrative area. The ICB welcomes the opportunity to comment on the proposed plan and options for growth and agrees with the priority placed on the three overarching principles that will sit at the heart of the Coventry Local Plan (improving outcomes and tackling inequalities,			

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						tackling climate change, and increasing the economic prosperity) ensuring that these areas are addressed through the planning policies. The NHS Long Term Plan has set a clear future direction of travel for the NHS in England and building on the national strategic aims outlined within Five Year Forward View. The General Practice Forward View places strong emphasis on the need to expand and strengthen primary and wider out-of-hospital care. More recently, the Fuller Stocktake underscored the necessity of integrating primary care with broader community services to facilitate a shift towards proactive, personalised care models and the Darzi Report, “High Quality Care for All”, emphasised the imperative of quality improvement and patient-centered service delivery. NHS England is currently co-producing a ten-year health plan, which drives a transformative agenda centred on three big			

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						shifts: moving health and care from hospital to the community, digitising services, and emphasising prevention. As such, developments (including community and health infrastructure) that support innovations in patient care, increased use of technology and integration of health, wellbeing and wider community services to develop community wellbeing and cohesion, are key to delivering the vision and strategic objectives detailed in the local plan. Within the ICS, the geographical footprint is co-ordinated around four 'place' areas: Coventry is one of the four, and this aligns with the scope of the proposed Coventry Local Plan. Strong partnerships between community services, general practice, social care, secondary care, and the voluntary sector with co-designed services are key foundations for our model of integrated care. A focus on			

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						community cohesion is key to addressing wider determinants of health and addressing health inequalities. The ICB welcomes the inclusion of health and wellbeing in the plan's strategic vision under Policy HW1, which takes into account the significant impacts on health and wellbeing of the population as well as the indirect implications for the wider community. A key role of the Local Plan is to provide for development in a way that supports healthy and active lifestyles. In addition, recognition of local health provisions in section 8.8 that: "As the city's population continues to grow and the needs of the population change in terms of an ageing population, the Council will continue to work with the Integrated Care Board and The University Hospital Coventry and Warwickshire NHS Trust. Although the city's population will remain one of the youngest across the sub-region it is still			

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						expected to age, and as such it will be important to ensure new facilities are easily accessible to those who need them”. As mentioned earlier in the response, the ICB has a duty to ensure that primary medical care (General Practice) infrastructure is adequately provided for within the Section 106 framework and that funding of future health provision and access is not compromised through housing development and population growth. The ICB envisages closer working with Coventry City Council and would also be grateful to collaborate proactively to help inform and develop the future Health Impact Assessment and Supplementary Planning Documents that will be undertaken through the development of the Local Plan. The ICB, with all health and care partners recognises that population health approaches and community wellbeing is key to addressing our health inequalities. The implementation of			

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						any of the projects requires a whole system approach to implementation beyond the physical implementation of the infrastructure (physical or digital) to support our population to access health and care and manage their health and wellbeing. Adequate allowances for this need to be made in Section 106 approaches being implemented. The ICB will ask the Council to share as much information as possible with it at the earliest stage as regards the likely profile of the population arising from any planned housing development. This will assist the ICB's wider planning process by enabling it to understand the likely health needs of the population, as well as the preferred channels of communication of sub-groups within the population, which in turn, allows for more effective service development, delivery, and population engagement.			

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						The ICB notes the following key trends and wider growth which sets the context for the plan. - The ICB is aware that healthcare delivery is in some areas increasingly provided from converted retail and industrial units and where need and funding is identified would support this use, following the standard NHS England health delivery site planning processes. - The ICB would strongly endorse the direction of net zero carbon and associated sustainability plans. - ICB is working closely with Coventry City Council planning team in relation to local housing and population growth. The ICB welcomes the key objectives which will have a positive impact on local population health, notably:			

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						- To support strong, vibrant and healthy communities, and protect enhance local services and facilities - To protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy - To help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure Key Messages - Existing primary medical care capacity in Coventry will not be sufficient to			

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						meet the housing growth proposed in the modified Local Plan. - The ICB will require suitable provisions put in place and adequate allowances made in the Section 106 work being undertaken by the local Council. - A collaborative approach between the ICB, health and care partners, and the local Council will be needed in support of the above, having regard to the Integrated Care System's 10 year Infrastructure Strategy. - The ICB would welcome the opportunity to engage further with the local council regarding what physical infrastructure projects/schemes will require support via Section 106 planning obligations. - The ICB does not expect physical infrastructure (built space) to form the "whole solution" and wishes to explore what opportunities there are to support other means of delivering			

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						additional primary medical care capacity via Section 106 planning obligations. - The ICB would request that the council gives full consideration to the need for good public transportation links to be in place to enable the population to access GP practice premises across the district (including any new premises constructed during the Plan period). - The ICB is mindful that broader issues affecting population health and wellbeing, including air pollution/quality and the availability of green spaces, are priorities. Recognising this, the ICB would strongly endorse the direction, including the use of Health Impact Assessments. The ICB will wish to work proactively with Coventry City Council to help inform and develop any future Health			

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						Impact Supplementary Planning Document. The ICB would ask the local council to share as much information as possible with it at the earliest stage as regards the likely profile of the population arising from any planned housing development. This will assist the ICB's wider planning process by enabling it to understand the likely health needs of the population, as well as the preferred channels of communication of sub-groups within the population, which in turn, allows for more effective service development, delivery and population engagement. I would, finally, like to thank you for giving the ICB the opportunity to comment on the proposed plan. We trust that the above comments will be taken into consideration. If appropriate, we would be more than happy to have further discussions with either Coventry			

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						City Council or their appointed representatives.			
Canal and River Trust (ID5)						Thank you for consulting the Canal & River Trust on the Coventry Local Plan Review. I can confirm that the Trust has no further comments to make on the Plan at this stage.		Noted	No change
Cather ine Bunke r(ID6)						I write to express my grave concerns and object to the contents of the new housing and development plan for Coventry. The plan includes housing allocations near important Local Wildlife Sites (LWS) and green corridors such as the Coundon Wedge, Coventry Canal and River Sowe, and doesn't go far enough in terms of Biodiversity Net Gain targets. I am extremely concerned about the plan for the following reasons:- The plan has not been positively prepared		Noted. The council considers its approach to be sound and this will be considered through examination where applicable	No change

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						The plan does not positively consider wildlife, green infrastructure, and biodiversity. Furthermore, it has failed to include a recommended 20% Biodiversity Net Gain, and the Tree Canopy Target has been removed. The plan is not properly justified The Plan and Sustainability Appraisal have not considered alternatives sites in enough detail, away from Local Wildlife Sites and environment assets. Allocations are also on land within the Green Belt. Policy GE1 and EM1 Climate Change The Green and Blue Infrastructure evidence is out of date, and it is not enough to rely on the Local Nature Recovery Strategy which is at a very early stage. Policy GE3 This is incorrect. It should refer to 'Local Wildlife Sites' and 'Potential Local Wildlife			

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						Sites', and it should say 'and enhance' and be more ambitious. Warwickshire Wildlife Trust has reiterated that in terms of Policy AC4 and Active Transport Provision, the plan needs to ensure it is balancing wildlife and transport needs. Green and Blue Infrastructure The plan does not consider wider Green and Blue Infrastructure issues and opportunities for enhancement and the Wildlife Trust's 'Wildbelt policy'. National Planning Policy Framework The plan is not consistent with National Planning Policy Framework as it includes sites within the Green Belt without a detailed review and sites near to designated Local Wildlife Sites: this is contrary to national policy and Habitat and NERC laws.			

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						In recent years the mass destruction of our greenbelt land has put huge pressure on the remaining green corridors and infrastructure. Large scale housing developments on previously protected greenbelt land, together with the destruction caused by HS2 and developments in neighbouring administrative areas, means we are now reaching a critical breaking point. I DO NOT WANT TO BE REMEMBERED AS THE GENERATION THAT DESTROYED OUR LOCAL ENVIRONMENT FOREVER. STOP DESTROYING OUR COUNTRYSIDE!			
Giles Rees (ID17)						Introduction I am submitting this response in relation to the Coventry City Council Local Plan under the Regulation 19 Consultation. I have significant concerns regarding many aspects of the Plan, which I believe fail to comply with national planning policies, overstate the housing		The council considers its brownfield first strategy, approach to growth and to the environment	No change

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						demand, and overlook vital environmental and infrastructure considerations. The primary objections I wish to raise are as follows: 1. Inaccuracies in the Housing Need Assessment 2. Over-allocation of Land and Insufficient Focus on Brownfield Sites 3. Lack of Comprehensive Infrastructure Planning 4. Failure to Address Affordable Housing Needs 5. Lack of a Dispersed Housing Strategy 6. Potential Negative Impact on Environment and Biodiversity 7. Breach of Duty to Cooperate 8. Justification for Returning Land to the Green Belt These concerns are supported by relevant policies, up-to-date data, and established planning principles.		and biodiversity to be sound. It considers it complies with the Duty to Cooperate and an update will be provided for submission of the plan given that this is an ongoing process involving a range of different partners.	

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						1. Inaccuracies in the Housing Need Assessment - The Council's estimated housing need of 1,455 dwellings per annum (dpa) does not align with the latest New Standard Methodology (NSM), which indicates a need for only 1,388 dpa. - The ONS 2021 Census data highlights that previous population estimates were overly inflated, particularly due to inaccurate assumptions regarding the student population. - According to the National Planning Policy Framework (NPPF, Paragraph 61), local plans must be based on the most current and reliable evidence available. Conclusion: The housing need figure in the Plan is inflated and should be revised to reflect Coventry's true demographic trends. 2. Over-allocation of Land & Insufficient Focus on Brownfield Sites			

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						- The Plan allocates 31,493 dwellings, whereas only 27,760 dwellings are necessary for the plan period. - When factoring in additional windfall sites and adjustments for student housing, there is an excess of 7,933 dwellings, meaning additional land allocation is unnecessary. - NPPF Paragraph 119 emphasizes the importance of prioritizing brownfield land before developing greenfield sites. The Plan fails to prioritize this approach. Conclusion: The over-allocation of land in the Plan contradicts national policy and must be reduced to reflect the actual housing need. 3. Lack of Comprehensive Infrastructure Planning - The Plan lacks a detailed strategy for the necessary infrastructure to support the proposed large-scale housing developments.			

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						- Key infrastructure concerns include: - Increasing road congestion and the lack of sustainable transport options. - Strained healthcare services (e.g., GP capacity, hospital services, emergency care). - Inadequate school facilities to accommodate the new population. - NPPF Paragraph 20 requires that local plans ensure the provision of infrastructure, but Coventry's plan lacks a clear and coordinated approach. Conclusion: The Plan is legally deficient due to insufficient infrastructure planning. 4. Failure to Address Affordable Housing Needs			

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						- The Plan does not adequately address the housing needs of low-income families and essential workers. - The focus on high-profit housing developments by private developers exacerbates the affordability crisis. - NPPF Paragraph 62 mandates that local plans must meet the housing needs of various income groups, which the Coventry Plan fails to do. Conclusion: Coventry City Council must revise the Plan to prioritize the development of affordable housing. 5. Lack of a Dispersed Housing Strategy - The Plan's emphasis on large-scale developments leads to: - Overloaded infrastructure in certain areas. - A disconnect between new housing and established communities.			

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						- Increased reliance on national developers at the expense of local builders. - A more dispersed housing strategy would: - Distribute development across multiple smaller sites. - Relieve pressure on local infrastructure. - Benefit local businesses and construction firms. Conclusion: The Plan should incorporate a more distributed housing model to ensure more balanced, sustainable growth. 6. Potential Negative Impact on Environment and Biodiversity - The Plan proposes development on environmentally sensitive areas, such as:			

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						- o Keresley Mere, a rare wetland habitat vital for local biodiversity. - o The Alders and Bunsons Wood, both ancient woodlands containing protected species. - o Pikehorn Wood, an important long-established woodland. • NPPF Paragraph 174 calls for the protection and enhancement of biodiversity, a requirement the Plan fails to meet. Conclusion: Development in these environmentally sensitive areas contradicts national policy and should be reconsidered. 7. Breach of Duty to Cooperate • Coventry City Council should not absorb additional housing requirements from Warwickshire if it results in the loss of Green Belt land.			

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						- Additional housing demand must be met within Coventry's existing urban areas. - The South Warwickshire development proposals (SGO1-3) should be reassessed, given Coventry's surplus housing supply. Conclusion: The Plan must avoid using Coventry's Green Belt to accommodate housing demands from Warwickshire. 8. Justification for Returning Land to the Green Belt - The 2021 Census data reveals that the initial rationale for removing land from the Green Belt was flawed. - NPPF Paragraph 138 allows for the reinstatement of Green Belt land when the original removal was unjustified. - Areas suitable for reinstatement include:			

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						- o Hounds Hill, a natural buffer zone. - o The Alders & Pikehorn Wood, irreplaceable ancient woodlands. - o Keresley Mere and surrounding fields, which are vital for biodiversity. Conclusion: Land previously removed from the Green Belt should be reinstated to protect Coventry's natural heritage. Final Recommendation: Revision of the Plan The current Local Plan is unsound and must be revised to: 1. Align housing need calculations with the New Standard Methodology. 2. Reduce the over-allocation of land. 3. Prioritize the use of brownfield sites over greenfield expansion. 4. Ensure that infrastructure is planned and funded prior to development.			

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						5. Guarantee that new developments include a substantial proportion of affordable housing. 6. Adopt a dispersed housing strategy for more sustainable development. 7. Reinstate key areas to the Green Belt to safeguard biodiversity.			
Peter Maddock (ID47)						These representations and objections are made by me on behalf of Coventry residents , my parents , and my brother [officer comment – personal details removed] The representations/ objections made by Mark Sullivan of CPRE are agreed and rather than setting out and duplicating the specific policies referred to by him , his comments are adopted in full and should be treated as complementing this submission. Please note that I am not using the forms simply for ease of access to these submissions in future and so that they can be copied to those on whose behalf they are made and other interested parties.		The council considers it has complied with the Duty to Co-operate, and considers its approach to be sound and its evidence to be robust.	No change

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						Under separate cover I will be forwarding the report of Gerald Kells. COVENTRY LOCAL PLAN REMOVAL OF LAND FROM THE GREEN BELT The central point to make is that very substantial areas of green belt in Coventry were removed from the green belt on the basis of housing figures and projections which (as many argued at the time) were unfounded. That the figures and projections were unfounded has been borne out by subsequent events , namely the Coventry 2021 census . Added to which is the almost unique position that Coventry now finds itself in ; its housing requirements being reduced . The only sensible conclusion is that the initial removal of land from the green belt was significantly flawed ; this is returned to later . APPROACH TO HOUSING NUMBERS FOR THE REGULATION 19 CONSULTATION			

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						Adopting the approach taken by Gerald Kells to housing numbers ; 1. The HEDNA figures should be set aside and the New Standard Methodology (NSM) (as per MHCVLG December 2024) should used ; 2. Using the NSM 27,600 dwellings would be required during the plan period ; 3. The plan identifies 31,493 but this should be increased by 4200 (see Gerald Kell's conclusions on Purpose Built Student Accommodation (PBSA) and Windfall). This gives a figure of 35,693 which gives an excess supply of 7,933 (35,693 - 27,600); 4. Whether considered as part of windfall or otherwise , the NPPF 2024 policies on grey belt must be considered now and an upward adjustment applied; 5. Whilst not normally strictly relevant to the consultation , the 5 year housing			

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						land supply is 5.6 years and as such there should be no further grants of permission on former green belt land. THE DUTY TO COOPERATE WITH NEIGHBOURING AUTHORITIES This is acknowledged as being an important part of the planning process. However, any acceptance by Coventry in future of housing requirements placed on other areas should be confined to the existing built up area within Coventry and not on land which is former green belt . In short , there is no case to transfer a housing requirement from one green field outside Coventry to a green field within Coventry. Taking a focus purely on the Keresley SUE, there are areas which are not subject to planning permission , and as Mark Sullivan notes , these areas should be returned to the green belt and should not be used for any housing which Coventry accepts in future under the duty to co operate . There is one			

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						parcel which does not have permission to the west of Fivefield Road which I do not include in this comment as it is a case worthy of specific attention. The case for exception circumstances is made below in respect of land in the northern part of the Keresey SUE RETURN OF LAND TO THE GREEN BELT WITHIN THE KERESLEY SUE There are exception circumstances warranting the return of land to the green belt at Keresley . This relates to the following land; 1. The Alders ancient woodland; 2. Pikethorne Wood ancient woodland; 3. Hall Yard Wood ancient woodland at the northern most bend in Fivefield Road ; 4. Bunsen's Wood ; 5. Keresley Mere (adajacent to Pikethorne Wood and the Alders) plus adjacent fields; 6. Hounds Hill (one of the highest points in Coventry (and possibly the highest)			

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						with the exception of any part of the nearby Burrough Hill which lies on Coventry) . 7. Thompson's Lane (the medieval lane where adjacent to Hounds Hill) leading from Fivefield Road ; 8. Any land to the north between these areas and the Coventry border with North Warwickshire not currently having permission. These areas meet the test for inclusion in the green belt as set out in the current NPPF (in the same way that they did prior to being removed) and the nearby permitted housing strengthens (not weakens) the case for inclusion . EXCEPTIONAL CIRCUMSTANCES The following in my view amounts to exceptional circumstances; 1. Subsequent evidence in the census and recent government reduction in housing requirements for Coventry bears out what objectors to the local			

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						plan stated , namely that the local plan was flawed in removing so much land from the green belt . This in itself calls for a review of green belt boundaries and return of land which still meets the NPPF tests in para 134. - Coventry City Council's (CCC) attitude to its own local plan and its failure to comply with its own stated policies as detailed in the next paragraphs. - Eastern Green SUE clearly states a total of 2250 (which on any reading of the word can only mean a maximum) . Yet CCC has approved 3250 . This is a total failure of CCC in applying it's own local plan. The same approach should not be allowed to take place at Keresley . The plan should be transparent and fairly applied . - The Keresley SUE figure is 3100 . At the time of writing around 2950 dwellings have already received permission . Please see appendix A for			

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						the details. Land is still available within the SUE other than the land at Hounds Hill and to the north up to the Coventry boundary , particularly on land to the west of Fivefield Road (please see later on this). 5. The antithesis of good planning by CCC in not requiring a coordinated masterplan for the Keresley SUE . Representations were made prior to the adoption of the Coventry plan for the need for a phased approach so that members of the public and interested bodies could see what was happening and comment on it . 6. The antithesis of good planning by CCC in approving several uncoordinated parcels of land for residential permission . As such , it is unclear how, where and when the required infrastructure (which was a fundamental part of CCC's argument			

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						that the Keresley SUE would be “sustainable”). 7. The antithesis of good planning by Coventry in not requiring a coordinated access system so that all adjacent parts of the SUE would be able to link into a common road network . This brings me onto the issues relating to land to the west (or southwest in some cases) of numbers 15 to 47 Fivefield Road which seemingly does not have a point of access into other approved areas. 8. Several approaches have been made to homeowners of that stretch so that sufficient houses can be demolished to create an access point onto Fivefield Road . This suggests that there is a ransom situation going on . Had there been a coordinated plan as their should have been , this parlous situation would not have arisen.			

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						9. This issue is exacerbated by the possibility that access will be taken through the site of demolished houses and where will that access be ? The only answer (and this is not supported) would be onto the south-eastern part of Fivefield Road (its south-eastern end) which Coventry has stipulated on existing permissions that only a limited number of houses should have access too. 10. This land will inevitably come forward during the plan period and is capable on its own of accommodating the remaining dwellings (approx. 150) in the SUE which does not have permission (3100 TOTAL minus approx. 2950 dwellings already approved) . 11. There are additional flaws in CCC's approach to its plan , namely not requiring provisions on granted permissions at Keresley to the			

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						requirement in HS1 of its plan to achieve enhanced connectivity between ancient woodlands . This is evident in relation to the two permissions granted next to ancient woodland ; adjacent to The Alders and adjacent to Bunsen’s Wood . There has been no realistic attempt to achieve this in either permission. 12. In fact regarding the permission granted to Richborough Estates adjacent to Bunsen’s Wood , this is exacerbated by approving a layout which is consistent with a road link to Hounds Hill . This is not so much enhancing connectivity between ancient woodlands as actually undermining it . 13. The next series of points are related to Coventry’s failure either to impose enforceable conditions or to actually enforce or be able to enforce those			

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						that it has . This is again the antithesis of good planning. 14. Enforcement of traffic routes in and around Fivefield Road proved impossible necessitating a consultation to vary it informally . 15. Failure to properly enforce the condition requiring no development within a buffer next to the Alders ; development includes all forms of development , not just buildings , and the condition should have been enforced to prevent any development of any sort (including drainage systems to deal with surface water run off). 16. Failure to consider the flooding impacts of granting permission to Richborough Estates for land running from Bunsen's Wood downwards to the lowest point in the area next to Ravenswood and Bennet's Road . An inadequate drainage system has been			

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						approved and CCC has reportedly purported to decline to take any action itself . Further development will only make worse an already dire situation. In short CCC has totally failed the residents of Keresley in its actions to date. THE CASE FOR RETURN OF LAND TO THE GREEN BELT (HOUNDS HILL AND LAND REFERRED TO ABOVE INCLUDING KERESLEY MERE AND ADJACENT FIELDS , THE FOUR ANCIENT WOODLANDS. THOMPSONS LANE). Matters relating to exceptional circumstances are set out above . The land met the tests for inclusion in the green belt from its inception decades ago . The land still does meet those tests without exception . In fact the granting of permissions in the area to the south strengthens the need to maintain the openness of these areas right up to the Coventry northern boundary.			

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						The Hounds Hill land itself is especially important in this respect , is very visible , provides a perfect buffer in conjunction with the other land referred to , lying as it does on the high ground between the four ancient woodlands, Hall Yard, Bunsens, Pikethorne Wood and the Alders , and linking with open land to the north right up to the Coventry boundary. OTHER IMPORTANT MATTERS Hounds Hill also and has for many years (certainly going back to the 1960s) been the nesting places for the skylark, which is on the red list . Also attached is Appendix B which comprises extracts from Warwickshire Biodiversity which emphasises the richness of bioversity in the area . Finally the historic interest in the area ; Fivefield Road and Thompsons Lane are medieval . The area has long been inhabited (note the nearby Burrough Hill) providing good defensive location with easy access to fresh			

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						water (the spring which now feeds Keresley Mere , long since culverted) and even the location of a medieval moated manor house (again fed by the nearby spring) CONCLUSIONS In conclusion; 1. The CPRE submission is supported . 2. The plan is unsound in retaining the whole of land within the Keresley SUE outside the green belt . 3. Land referred to above should be returned to the green belt . The same might apply to other areas too elsewhere in Coventry . 4. It should be made absolutely crystal clear that when the plan refers to a “ total “ of 3100 dwellings in the Keresley SUE , that “ total “ does indeed mean what the vast majority would mean as being a “ maximum “			

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						Officer comment – appendices attached to the full rep made by CPRE to which this response refers			

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
Define Plannin	4,5,6,7	N/A	N/A	N/A	Y	As discussed in the above representation, the Sustainability Appraisal fails to sufficiently consider the		The SA is considere	No change

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g & Design Ltd on behalf of William Davis Homes (ID14)						impact of the chosen housing requirement and site allocation strategy and the failure to deliver the housing needed, particularly in relation to affordable housing.		d to have assessed these matters appropriately.	
MSP+D Ltd (ID35)	4.116 to 4.132 & Table 4.7(b); 6.1 to 6.4;6.22 to	N/A	N/A	N/A	Y	Officer comment – although the representation form references paragraphs of the SA it does not make any further comment			No change

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	6.23; 7.10								
Environment Agency (ID15)	6.11	N/A	N/A	N/A	No response	Concerns about the supporting evidence to inform Section 5 and Appendix V of the SA Report.		See signed SoCG (DtC compliance paper)	See SoCG
Thomas Willans (ID65)	6.5, 6.22- 6.23				N	By its nature policy on green belt has implications for most areas of strategic planning policy but I am especially aware of the impact upon housing needs, employment needs, the environment and urban sprawl.		Noted	No change
Nexus Planning on behalf of CEG Land Promot	Para 4.28	N	N	N	Y	Policy DS1 states that provision will be made for a minimum of 29,100 (1,455 per annum) additional dwellings between 2021 and 2041. The supporting text to the policy confirms the housing need figure has been derived from the Coventry and Warwickshire Housing and Economic Development Needs Assessment ("HEDNA") (2022) and that this was confirmed to be a	The Council should therefore adopt a housing requirement greater than the HEDNA figure. As noted by Planning Practice Guidance; the use of the Standard Method figure to inform the housing requirement will only start to address affordability challenges rather	Although the SA is cited via para. Reference in the rep there	No change

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ion (ID39)						reliable basis for plan making in the Review of Coventry's Local Housing Need (June 2024). The NPPF 2012 introduced a radical shift in relation to the approach to meeting housing needs. This remains in the 2023 version where at paragraph 8 three overarching objectives are outlined to securing sustainable development. Paragraph 8b states that to achieve the 'social objective' it is necessary to "to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations..." Paragraph 60 of the NPPF then states that "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay." Despite the additional requirements and objectives imposed by the NPPF, it is widely accepted that there is a national housing crisis due to the consistent failure to achieve the Government's target of 300,000 homes per	than address them entirely. The Council seeks to rely upon the December 2023 NPPF for the assessment of soundness of the Local Plan Review and so to fail to propose a housing requirement in accordance with the Standard Method associated with that version of the NPPF, the Council's approach is not positively prepared or justified. To rectify this, CEG consider that the Council should instead adopt a housing requirement at least in accordance with the December 2023 Standard Method plus urban uplift. The only way to truly address affordability crises' and to seek to eat away at the identified affordable housing need is to plan for the delivery of more housing across the City which will in turn deliver a greater quantum of affordable housing.	seem to be no comments specifically in terms of the SA itself	

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						annum, with affordability unsurprisingly worsening across many parts of the country. Accordingly, it is vital the Local Plan Review sets a positive framework to fully accommodate its housing needs and importantly, address underlying housing market issues. By relying upon a housing requirement established by the HEDNA, the Council's approach fails to follow the requirements of the December 2023 NPPF which requires use of the Standard Method to establish the starting point for its housing requirement. However, it then leans upon the policy and delivery policy mechanisms available to ensure the City's selected housing requirement is met in full, including through use of a Green Belt review and making of additional housing allocations and declaring an unmet need if needed. CEG does not consider it to be appropriate for the Council to choose to use to comply with some parts of the December 2023 NPPF but disregard others. The December 2023 NPPF is clear at paragraph 61 that housing need should be calculated using the Government's Standard Method unless there are exceptional circumstances (emphasis added) to justify an alternative approach. The HEDNA outlines a	The decline in the delivery of affordable housing and the rate of PBSA being delivered within Coventry further confirms the importance of providing the sufficient type and number of dwellings to meet housing need. The December 2023 NPPF states, at paragraph 63: <i>"Within this context of establishing need, the size, type and tenure or housing needed for different groups in the community should be assessed and reflected in planning policies..."</i> In Coventry, the importance is reinforced when looking at the needs for different house types within the HEDNA. The type of accommodation needed within Coventry is closely aligned with that required within Warwick and Stratford-On-Avon Districts and shows a clear need for family-sized market accommodation i.e. 3-bedroom houses (40%).		

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						rationale for applying a trend-based approach, citing historic issues with calculating demographic projections due to the influence of the student population. Whilst there is a degree of merit to this approach, noting the test of national policy, it is considered that further justification is still required in this regard to meet the bar of 'exceptional' circumstances. The use of the HEDNA figure does not account for the urban uplift, a requirement of the December 2023 NPPF. Again, there is no justification presented as to what the exceptional circumstances are to justify removal of this 35% uplift to the Standard Method figure. It is important to note that the HEDNA recommends the inclusion of this uplift as part of its assessment of housing need across Coventry and Warwickshire, however this is ignored by the Local Plan Review. Coventry, as the sub-regional centre, should clearly be taking a leading and pro-active role in meeting its identified housing need and to omit the urban uplift against national policy is an unsound approach.	Given the finite supply of land within Coventry and the recent trends towards the delivery of smaller units and PBSA, there is a clear need to ensure that allocations are made that can provide for a range of house types, in particular family-sized accommodation. This is crucial to help meet Coventry's housing needs and the Local Plan Review's intent to deliver the housing requirement entirely within Coventry's boundaries is likely to further constrain the type of housing that can viably and feasibly be delivered in the City. It is therefore clear that Coventry must work with its neighbours to find suitable land for the delivery of family housing to ensure that the needs for housing for all parts of the community are satisfied, in line with paragraph 63 of the December 2023 NPPF. This issue cannot simply be deferred until the		

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						Iceni, the Council's consultants, support a deviation from the 2014 projections but they continue to apply the standard framework method to the revised figures. Having arrived at a revised figure, Iceni continue to apply the other elements of the standard method including, crucially, the application of the urban uplift. This is the approach Iceni have adopted for other studies elsewhere, for example in Birmingham and in Leicester and Leicestershire. Coventry's suggested approach is contrary to its own evidence base, which includes the 35% uplift. This revised approach appears to attempt to reduce the housing requirement as much as possible without any clear justification as to what exceptional circumstances exist to support this position. The Council needs to be clear and explicit in the choices it is seeking to make and apply the tests in NPPF to see if it is justified in doing so. Paragraph 35 of the NPPF is explicit in that plans are 'sound' if appropriate strategies are justified, taking into account reasonable alternatives, and based on proportionate evidence. At present, it is strongly suggested the Councils approach is unsound as there is no	next local plan review as the shortfall will continue to compound and worsen in years to come – it is critical that this issue is addressed head-on by the Local Plan Review. For the reasons set out above, CEG consider that the plan's failure to justify deviation from the standard method, failure to plan for the urban uplift and to plan proactively for the type of housing that is required means that Policy DS1 is not effective, nor positively prepared and is therefore unsound. Whether against the selected housing requirement or an uplifted requirement as dictated by the December 2023 NPPF, suitable sites capable of delivering family housing, such as Westwood Heath, need to be identified and their delivery supported. This requires working collaboratively with neighbouring authorities such as Warwick District Council now under		

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						justification for the removal of the urban uplift or deviation from the use of the Standard Method. The Council state that their housing need will be delivered fully within the Council's administrative area through an urban and brownfield-focused strategy. CEG have serious concerns regarding this approach particularly given the worsening affordability of family housing, the finite supply of land within Coventry and the over-reliance on smaller units and Purpose-Built Student Accommodation (PBSA) to meet the housing requirement, both historically and looking forward. Housing affordability is an ongoing and increasing pressure which will require a proactive approach to address. Furthermore, when considering Coventry's needs and the type of development that has taken place and is needed in the future, it is critically important that housing is delivered which meets the needs of the whole population. The 2023/24 Annual Monitoring Report ("AMR") for Coventry indicates that housing delivery is ahead of the overall requirements established in the adopted Local Plan. However, of 1,859 completions 837 (45%) of these were PBSA, compared to 1,022 (55%) residential	the Duty to Cooperate given the scarcity of suitable land within Coventry. Officer comment: See full representation for additional information		

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						dwellings. It is clear that Coventry's housing needs are not based upon the provision of over half of new dwellings required to be student accommodation and CEG considers this must be addressed in planning for future delivery. The 837 (45%) of dwellings delivered as student accommodation were in the form of flats/apartments specifically for student living. This type of housing delivery severely impacts the delivery of affordable housing which has been continually declining throughout the plan period, as PBSA is exempt from affordable housing contributions in Coventry. From a peak of 39% in 2012/13 the general trend for affordable housing completions as a percentage of the overall number has continued to decline with only 9.7% of overall completions being affordable in 2023/24. The affordable housing need identified in the Table 8.13 of the HEDNA is 1,887 dwellings per annum. When this is compared to the Council's selected housing requirement in the Local Plan Review of 1,455 dwellings per annum, affordable housing need would equate to 129% of the housing requirement using the			

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						trend-based projections. The selected housing requirement will quite clearly result in a significant level of unmet affordable housing need that will not be delivered if the Local Plan Review proceeds in its current form.			
Nexus Planning on behalf of CEG Land Promotion (ID39)	5.1 onwards	N	N	N	Y	CEG strongly object to the approach of Policy H1 as it is unsound as set out below. As already outlined in the response to Policy DS1, CEG object to the Council's proposed housing requirement. CEG also consider that the Council will need to work with neighbouring authorities through the duty to cooperate to meet both its overall need, assuming this is uplifted to include the 35% urban uplift, and to meet the demand for different types of housing unlikely to be delivered within Coventry's boundaries. In this regard, the Council should support development at the safeguarded land within the Warwick District Local Plan (Policy DS21 – S1) which is adjacent to the safeguarded land in the Coventry Local Plan (Policy GB2), under the Duty to Cooperate. CEG are also promoting wider land holdings to the South of Coventry, adjacent to the safeguarded land, which offers a wider opportunity to accommodate Coventry's housing need in a sustainable	Policy DS20 'Directions for Growth South of Coventry' of the WDLP acknowledges the transformational change that could occur in the area and commits Warwick District Council (WDC) to an early partial review within five years of the date of adoption of the plan (Summer 2022). The policy is clear that this will allow the Council to address any additional evidence regarding the need and potential for development in this area and in particular to ascertain whether necessary infrastructure has become available to allow safeguarded land to be brought forward to meet local housing need. The Coventry City Local Plan (the subject of this review)	Although the SA is cited via para. reference in the rep there seem to be no comments specifically in terms of the SA itself	No change

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						location that has a strong spatial relationship with the city. The site is being promoted by CEG for development as part of the South Warwickshire Local Plan ("SWLP") and has been confirmed as suitable for development and also identified as a Spatial Growth Option in the Preferred Options consultation document. Coventry, through the duty to cooperate, should support development of the safeguarded land (Policy DS21-S1 of the Warwick District Local Plan) at Westwood Heath and a spatial strategy that seeks to direct wider housing growth to the south of Coventry. Further details of the safeguarded land and the wider land to the south of it, described collectively as "the site" is provided below.	similarly safeguarded an area of land south of Westwood Heath Road (Policy GB2) which would be released upon a review of the plan and clarity on development proposals within Warwick District. Having regard to the above, WDC subsequently commenced preparation of a wider south of Coventry masterplan framework, which is now in progress. Sustainable Location The site benefits from easy access to a range of services and facilities. It is not subject to any landscape designations, it is located within Flood Zone 1 and does not contain any designated heritage assets. Whilst situated wholly within the Green Belt, circa 30 ha of the site is identified as safeguarded land (to meet longer term strategic development needs) through Policy DS21 of the WLP. Part of the site is located adjacent to and south of the		

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							Westwood Heath Road and would form a natural extension to the existing residential area. It benefits from having direct frontage along the Westwood Heath Road thus enabling a new junction to be accommodated to access the development. A number of local facilities including the Westwood Academy Secondary School, recreational pitches, a Sport and Wellness Hub, and convenience food stores are in the immediate vicinity of the site. Tile Hill station offering connections to Birmingham and London) is 1.4km away and Coventry City Centre is 6.4km and is accessible by Bus and Cycle. Local bus stops are within a comfortable walking distance from the site along within the University of Warwick's main campus making public transport a genuine option for travel. The site benefits from excellent pedestrian		

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							infrastructure with continuous footways on the North side of Westwood Heath Road which can be enhanced. Similarly, the proximity to the campus will facilitate access to existing cycle infrastructure and this will be integrated with the green travel corridor providing links into Coventry and across the area. This corridor also has the potential to integrate with wider connections to the HS2 interchange at Arden Cross. The site is therefore in a highly sustainable position that benefits from excellent public transport linkages. Development in this location would provide a significant level of market and affordable housing and supporting community infrastructure. It would also help facilitate the delivery and provide financial contributions towards a green-travel corridor which would facilitate an improved southern access		

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							to The University of Warwick. These infrastructure improvements will align with the significant transport improvements already being implemented in the area, including the improvements at the A46 Stoneleigh Junction and the new crossing of the A45, which would, in its own right, deliver significant social and economic benefits locally and at the subregional level. Our proposals would also align with the opportunities identified by WDC through the planned preparation of a wider south of Coventry masterplan. At this stage, a 'Conceptual Framework' is provided (enclosed to these representations) to outline how development of Westwood Heath could sustainably be delivered across land ownerships. This demonstrates that the site can address site specific considerations, comprising the following development within		

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							CEG's control: · Circa 2,500 market and affordable dwellings of a type that will make a significant contribution to specific housing needs, divided as follows: - Circa 650 within the safeguarded land; and - Circa 1,850 dwellings within wider land. · Employment/commercial development in a strategic location to offer collaboration opportunities between business and the university; · Significant community infrastructure provision including a neighbourhood centre, a 2 FE primary school, sports pitches, public parkland and biodiversity parkland; · A substantial network of green infrastructure with green corridors that will provide opportunities for sustainable travel and recreation. This will build upon a local neighbourhood concept; · New movement corridors to help address existing traffic and associated		

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Respon dent / organis ation / agent	Secti on	Comp lies with Duty to Coop erate Y/N	Legal ly Com plian t Y/N	Soun Y/N	Does respo ndent wish to appe ar at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
							environmental issues within Coventry and aligning with ongoing infrastructure improvements in the area, improving access to the University with the potential to facilitate access to the HS2 interchange at Arden Cross; · Ensuring development avoids coalescence between settlements through keeping development to the North of HS2; and · Strong connectivity to Coventry and the University of Warwick's main campus, supporting its role as a Major Investment Site Overall, the proposals represent a highly sustainable option growth option that can deliver a range of substantial benefits. Whilst it will be a matter for the SWLP to comprehensively consider the substantial benefits that can be delivered through large scale growth at Westwood Heath through a strategic growth corridor, it is considered that		

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							there will be substantial benefits to Coventry City through development in this location. Whilst this will be a matter for the Duty to Cooperate it is noted that paragraph 11a of the NPPF states that plans should positively seek opportunities to meet the development needs of their area. Therefore, it is considered that this local plan review should reaffirm Coventry City Council's support for growth south of Coventry, specifically at Westwood Heath.		
Keith Whitehead (ID25)	4.10, 4.12, 5.19, 7.16			N	Y	Regulation 19 representation regarding the Sustainability Appraisal The Sustainable Appraisal (SA) is not sound because the claimed protections for sustainability can be effectively removed by the policies that the SA refers to. <i>4.108 Nature & Biodiversity: The fragmentation and erosion of habitats remains a threat, and the need to</i>		The policies of the plan are designed to deliver protection where applicable. The	No change

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						<i>secure biodiversity gain and improve the wider ecological network remain important objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated and should provide sufficient mitigation such that effects from new development will be at least neutral with regard to GB land for both options. All development will have to meet with the national requirements for BNG indicating positive effects.</i> <i>“secure biodiversity gain and improve the wider ecological network remain important objectives” “that effects from new development will be at least Neutral”.</i> These are admirable statements but as has been already seen in the developments north of Whitley biodiversity net gain assessments, where the assessment was not at least neutral but actually negative.		council considers its approach to be sound	

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						"The current adopted Plan has policies to protect nature and biodiversity". This is untrue if the land has a strategic allocation applied to it. From Policy GE3 2. <i>Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased.</i> So the developer is given a route to just pay money and not deliver at least neutral biodiversity gain. From Policy GE2 1. <i>Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation.</i> This gives a developer two avenues to avoid delivering at least neutral biodiversity gain, 1) pay for a report that says the land is of no value for amenity, recreational and/or community use, 2) If land is part of a strategic land use allocation. <i>4.129 Nature & Biodiversity: The current adopted Plan has policies to protect nature & biodiversity, including</i>			

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						<i>GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such that there will be no major significant negative effects. The Council will continue to allocate employment development sites to PDL and new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty as depends upon locational specificity. All development will need to meet with the national requirements for BNG, indicating positive effects.</i> <i>“The current adopted Plan has policies to protect nature & biodiversity”. This is untrue if the land has a strategic allocation applied to it.</i> <i>From Policy GE3 2. Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased. So the developer is given a</i>			

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						route to just pay money and not deliver at least neutral biodiversity gain. From Policy GE2 1. <i>Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation.</i> This gives a developer two avenues to avoid delivering at least neutral biodiversity gain, 1) pay for a report that says the land is of no value for amenity, recreational and/or community use, 2) If land is part of a strategic land use allocation. 5.19 <i>The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt and Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements⁷⁵ for Biodiversity Net Gain (BNG) – and Coventry has established practice through such an approach with its BNG SPD (2022)⁷⁶.</i>			

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						<i>Therefore, positive effects but uncertainty of precise significance as this depends on detailed project design.</i> <i>“The current adopted Plan has policies to protect nature and biodiversity”. This is untrue if the land has a strategic allocation applied to it.</i> <i>From Policy GE3 2. Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased. So the developer is given a route to just pay money and not deliver at least neutral biodiversity gain.</i> <i>From Policy GE2 1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation. This gives a developer two avenues to avoid delivering at least neutral biodiversity gain, 1) pay for a report that says the land is of no value for amenity,</i>			

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						recreational and/or community use, 2) If land is part of a strategic land use allocation. <i>5.19 The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt and Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements⁷⁵ for Biodiversity Net Gain (BNG) – and Coventry has established practice through such an approach with its BNG SPD (2022)⁷⁶. Therefore, positive effects but uncertainty of precise significance as this depends on detailed project design.</i> <i>“The current adopted Plan has policies to protect nature and biodiversity”. This is untrue if the land has a strategic allocation applied to it.</i> <i>From Policy GE3 2. Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be</i>			

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						<i>allowed to be purchased.</i> So the developer is given a route to just pay money and not deliver at least neutral biodiversity gain. <i>From Policy GE2 1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation.</i> This gives a developer two avenues to avoid delivering at least neutral biodiversity gain, 1) pay for a report that says the land is of no value for amenity, recreational and/or community use, 2) If land is part of a strategic land use allocation. <i>7.16 A Habitats Regulations Assessment (HRA) Screening (August 2024) concluded that there is no requirement for the Coventry Local Plan to include any policy regarding European and internationally designated sites for nature conservation. Policy GE3 continues to protect national and locally important biodiversity and has been updated to incorporate the new national minimum requirement for 10% net gain in biodiversity for all new development. Policies GE2-3 with minor updating continue to provide information</i>			

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						<i>and guidance such that the green/blue infrastructure network in the plan area should be enhanced, particularly in the longer term and networks are linked, widened and become more established with overall positive effects for SA objectives for nature and biodiversity.</i> <i>“Policy GE2 with minor updating continue to provide information and guidance such that the green/blue infrastructure network in the plan area should be enhanced”. This is untrue if the land has a strategic allocation applied to it.</i> <i>From Policy GE3 2. Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased. So the developer is given a route to just pay money and not deliver at least neutral biodiversity gain.</i>			
Joscelyne Bigham (ID23)	1.5, 1.6, 6.29, 6.30	N	N	N	N	‘It is a requirement to consider if the plan is likely to have significant effects on the integrity of any relevant designated site.’		The HRA is considered to be	No change

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	7 6.31					There are inaccuracies within the HRA Screening document which need to be addressed and its conclusion regarding the effects on the Severn Estuary SAC/Ramsar site will need to be reevaluated. Consult with Natural England and use up to date online resources such as Environment Agency's Statutory Main River Map and Catchment Data Explorer. Officer comment: refer to representation on HRA Screening Report for more information.		accurate and fit for purpose	
Joscelyne Bigham (ID23)	7.9, 7.13 & 7.14	N	N	N	N	To achieve SA objectives public transport links with to Coventry's TTWAs within Warwickshire need to be addressed. To tackle poor air quality, measures need to be put into place to reduce through traffic and to limit HGV movements along the B4113 and its side roads (Bedworth Road–Longford Road–Foleshill Road). Officer comment: for further information, refer to the representations from this representor on policies JE5 and AC7.		Noted	No change
Joscelyne Bigham (ID23)	4.28-4.34, 5.7 & 5.8	N	N	N	N	Officer comment: No specific response cited, For further information, refer to the representation from this representor on policy H11.		Noted	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legal Compliance Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
Joscelyne Bigham (ID23)	3.13					Officer comment – no specific response cited in relation to the paras cited. For further information, refer to the representation from this representor in the ‘general’ representations section.		See officer comment on the representation	No change
Home Builders Federation (ID21)	All	N	N	N	Y	1. HBF note that our request for a full Green Belt review would require additional Sustainability Appraisal work. We would welcome the opportunity to comment on a revised SA as part of the Green Belt review. 2. The current Sustainability Appraisal should have considered a higher level of growth and the impacts of a full Green Belt review and meeting housing and employment needs in full. Officer comment: Please refer to all policy representations made by this representor	A full green belt review would require additional SA work.	A full Green Belt Review is not considered to be required.	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
Stantec on behalf of HGIT Central Coventry Ltd (ID57)	All			N	Y	Please see associated representation. The SA is only considered to have appropriately reviewed brownfield sites in relation to residential uses rather than bringing employment sites back into full economic use. Officer comment: Please refer to all policy representations made by this representor		The scope of the SA is considered proportionate to the scope of the Local Plan Review and it considers employment matters.	No change
WWT (ID71)	All		N	N	N	The Sustainability Appraisal hasn't considered environmental impacts and particularly Local Wildlife sites and Potential Local Wildlife Sites in detail. The plan allocates land in the green belt, Courdon wedge and near to important Local Wildlife Sites		The Local Plan Review does not new growth	No change

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Respon dent / organis ation / agent	Secti on	Comp lies with Duty to Coop erate Y/N	Legal ly Com plian t Y/N	Soun Y/N	Does respo ndent wish to appe ar at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
						without a clear assessment of environmental impacts and alternative sites considered in detail.		in the Green Belt, Coundon Wedge nor on or near wildlife sites. It is a brownfield-first strategy.	
Sally Rees (ID50)		N	N	N	Y	Officer comment: Please refer to full representation in the 'general' section. Included here as the letter makes reference to the 'failure to consider a dispersed housing strategy'.		A range of spatial options have been appraised which are proportionate to	No change

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Respon dent / organis ation / agent	Secti on	Comp lies with Duty to Coop erate Y/N	Legal ly Com plian t Y/N	Soun Y/N	Does respo ndent wish to appe ar at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
								the scope of the plan review, and realistic in terms of the options in a tightly constrained administrative area.	
NHS Coventr y and Warwic kshire Integrat	All	Y	Y	Y	N	Officer comment: Please refer to full representation in the 'general' section, there are no specific comments on the SA itself although it says 'all' on the response form.		See officer comment in the representation section	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
ed Care Board (ID40)									
WWT (ID71)	All		N	N	N	Justified – the plan and ‘Sustainability Appraisal’ hasn’t considered alternatives sites in enough detail, away from Local Wildlife Sites and environment assets and there’s not enough previous consultation on housing sites. Allocations are also on land within the Green Belt, an important buffer for protected and important species know to use the area.		The plan review has assessed sites and considers the selection to be appropriate	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Joscelyne Biggam (ID23)	HRA Screening report (paragraph 4.17-5.2)	N	N	N	N	The HRA Screening Report appears to be inaccurate with its statements regarding Coventry's Main Rivers and the use of terms. Furthermore, the conclusion does not appear to have considered that the Local Plan area is hydrologically linked with the Severn Estuary SAC/Ramsar site through the River Sowe tributary of the Warwickshire River Avon. The HRA Screening Report states that 'a requirement for HRA will continue as set out in the Conservation of Habitats & Species (Amendment)(EU Exit) Regulations (2019).' Therefore, if there is an issue with the accuracy of the HRA and the validity of its conclusions, it could have an impact on	Rewrite the HRA to address the inaccuracies highlighted in the previous section and reevaluate the conclusion in light of the River Sowe being functionally-linked habitat for the...Severn Estuary SAC/Ramsar site.' Consider using the text from Nuneaton and Bedworth Borough Council's HRA Addendum.	The HRA is considered to be accurate and fit for purpose.	No change

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						whether the Local Plan Review is considered to be legally compliant and/or sound. Has the Environment Agency's Statutory Main River Map and Catchment Data Explorer been used as a reference? 'The statutory main river map is a spatial (polyline) dataset that defines statutory watercourses designated by the Environment Agency as main rivers.' 'The Catchment Data Explorer is designed to help you explore and download information about the water environment used in River Basin Management Plans. You can find catchments and water bodies of interest using a map, or by searching for names, view summary information about catchments, download data and follow links to other useful sites.' On looking at these maps, a confluence of the River Sherbourne with the River Sowe appears			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						to take place just south of the A45 near Baginton. The River Sowe's confluence with the River Avon occurs further downstream, south of Stoneleigh. Therefore, would it not be more accurate to say that the River Sherbourne is a tributary of the River Sowe and that the River Sowe is a tributary of the River Avon? This needs to be clarified. In terms of the River Avon, the HRA also states that 'the river runs to the southwest passing within about 5 km of the administrative boundary for Coventry.' Could this be clarified? At the point where it flows underneath the A45, it appears to be within 1km of the City's administrative boundary at Rowley Road and a small section of the boundary appears to run along the rivers' course in between London Road and Siskin Drive. There appear to be other watercourses marked on the Statutory Main River Map as			

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						Main Rivers. Even if they do not have 'river' in their names, should they still be referenced within the HRA? Canley Brook? Withy Brook? There is also concern as to why habitats sites have been 'screened out for appropriate assessment with regard to water quality.' If the River Sowe is a tributary of the River Avon, surely it (and its tributaries) is hydrologically linked with the Severn Estuary SAC/Ramsar site. Furthermore, the River Sowe (and its tributaries) could potentially become part of a Local Nature Recovery Strategy (LNRS) in the future. As such, it would be ideally placed to tackle issues such as water quality, nature recovery, environmental inequity and climate change through natural flood management (NFM) schemes. Although they are not a 'responsible authority', CCC will still be required, as a planning authority, to produce a Biodiversity Report and this will involve giving details on			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						how LNRS has been considered. For the West Midlands, it is the West Midlands Combined Authority (WMCA). For Warwickshire, the responsible authority is Warwickshire County Council, working with the Local Nature Partnership. The Habitats Regulations Assessment of the Nuneaton and Bedworth Local Plan Review Addendum October 2024, states, ‘2.1 In their response to the consultation on the Local Plan Review and its HRA, Natural England observed that the Plan area is located upstream of the Severn Estuary Special Area of Conservation (SAC) and Ramsar Site (approximately 96km to the south-west) and is hydrologically linked to the designated sites through the River Sowe tributary of the Warwickshire River Avon’ ‘2.2 The Severn Estuary migratory fish species (Atlantic salmon, sea trout, allis shad, twaite			

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Respo ndent / organi sation / agent	Sec tio n	Compl ies with Duty to Coope rate Y/N	Legal ly Com plian t? Y/N	Soun d Y/N	Does respon dent wish to appea r at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						shad, sea lamprey, river lamprey and European eel) travel upstream through the River Severn and its tributaries, spending part of their life cycle in the wider Severn hydrological catchment. Currently the tidal weir at Tewkesbury is Page 6 of 19 believed to present an obstacle to most of the migratory fish species, with the exception of the European eel, which has been recorded within the Warwickshire Avon... It is also understood that European eel have been recently recorded in the River Sherbourne, which is a tributary of the River Sowe. There is therefore the possibility of these species being present during the Plan period within the...River Sowe (and possibly tributaries) which would render these rivers functionally-linked habitat for the...Severn Estuary SAC/Ramsar site.' Would it be possible to include a similar text within Coventry City Council's HRA?			

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Where relevant, the Local Plan should identify locations (strategic employment/housing sites, local wildlife sites, potential local wildlife sites and local nature reserves) which are hydrologically linked with the Severn Estuary SAC/Ramsar site. It needs to ensure that there is appropriate assessment regarding water quality and quantity/flow/levels and that measures are put into place to improve water quality and conditions for migratory fish such as European eel.'			
Natural England (ID37)						Habitats Regulations Assessment (HRA) Natural England notes the Habitats Regulations Assessment prepared in support of the plan. We agree with your conclusions with regard to Ensor's Pool Special Area of Conservation and the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar.			

Sustainability Appraisal

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
Define Planning & Design Ltd on behalf of William Davis Homes (ID14)	4,5,6,7	N/A	N/A	N/A	Y	As discussed in the above representation, the Sustainability Appraisal fails to sufficiently consider the impact of the chosen housing requirement and site allocation strategy and the failure to deliver the housing needed, particularly in relation to affordable housing.		The SA is considered to have assessed these matters appropriately.	No change
MSP+D Ltd (ID35)	4.116 to 4.132 & Table 4.7(b)	N/A	N/A	N/A	Y	Officer comment – although the representation form references paragraphs of the SA it does not make any further comment			No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
	; 6.1 to 6.4; 6.22 to 6.23; 7.10								
Environment Agency (ID15)	6.11	N/A	N/A	N/A	No response	Concerns about the supporting evidence to inform Section 5 and Appendix V of the SA Report.		To be discussed with the EA under the DtC	To be confirmed via an SoCG with the EA
Thomas Willans (ID65)	6.5, 6.22-6.23				N	By its nature policy on green belt has implications for most areas of strategic planning policy but I am especially aware of the impact upon housing needs, employment needs, the environment and urban sprawl.		Noted	No change
Nexus Planning on behalf of CEG Land Promoti	Para 4.28	N	N	N	Y	Policy DS1 states that provision will be made for a minimum of 29,100 (1,455 per annum) additional dwellings between 2021 and 2041. The supporting text to the policy confirms the housing need figure has been derived from the Coventry and Warwickshire Housing and Economic Development Needs Assessment ("HEDNA") (2022) and that this was confirmed to be a reliable basis for plan making in the Review of Coventry's Local Housing Need (June 2024).	The Council should therefore adopt a housing requirement greater than the HEDNA figure. As noted by Planning Practice Guidance; the use of the Standard Method figure to inform the housing requirement will only start to address affordability challenges rather than address them entirely. The Council seeks	Although the SA is cited via para. Reference in the rep there seem to	No change

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Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
on (ID39)						The NPPF 2012 introduced a radical shift in relation to the approach to meeting housing needs. This remains in the 2023 version where at paragraph 8 three overarching objectives are outlined to securing sustainable development. Paragraph 8b states that to achieve the 'social objective' it is necessary to "to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations..." Paragraph 60 of the NPPF then states that "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay." Despite the additional requirements and objectives imposed by the NPPF, it is widely accepted that there is a national housing crisis due to the consistent failure to achieve the Government's target of 300,000 homes per annum, with affordability unsurprisingly worsening across many parts of the country. Accordingly, it is vital the Local Plan Review sets a positive framework to fully accommodate its housing needs and importantly, address underlying housing market issues.	to rely upon the December 2023 NPPF for the assessment of soundness of the Local Plan Review and so to fail to propose a housing requirement in accordance with the Standard Method associated with that version of the NPPF, the Council's approach is not positively prepared or justified. To rectify this, CEG consider that the Council should instead adopt a housing requirement at least in accordance with the December 2023 Standard Method plus urban uplift. The only way to truly address affordability crises' and to seek to eat away at the identified affordable housing need is to plan for the delivery of more housing across the City which will in turn deliver a greater quantum of affordable housing. The decline in the delivery of affordable housing and the rate of PBSA being delivered within Coventry further confirms the importance of providing the sufficient type and number of dwellings to meet housing need. The December 2023 NPPF states, at paragraph 63:	be no comments specifically in terms of the SA itself	

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						By relying upon a housing requirement established by the HEDNA, the Council's approach fails to follow the requirements of the December 2023 NPPF which requires use of the Standard Method to establish the starting point for its housing requirement. However, it then leans upon the policy and delivery policy mechanisms available to ensure the City's selected housing requirement is met in full, including through use of a Green Belt review and making of additional housing allocations and declaring an unmet need if needed. CEG does not consider it to be appropriate for the Council to choose to use to comply with some parts of the December 2023 NPPF but disregard others. The December 2023 NPPF is clear at paragraph 61 that housing need should be calculated using the Government's Standard Method unless there are exceptional circumstances (emphasis added) to justify an alternative approach. The HEDNA outlines a rationale for applying a trend-based approach, citing historic issues with calculating demographic projections due to the influence of the student population. Whilst there is a degree of merit to this approach, noting the test of national policy, it is considered that further justification is still required in this regard to meet the bar of 'exceptional' circumstances. The use of the HEDNA figure does not account for the urban uplift, a requirement of the December 2023 NPPF. Again, there is no justification presented as to what the exceptional	<i>"Within this context of establishing need, the size, type and tenure or housing needed for different groups in the community should be assessed and reflected in planning policies..."</i> In Coventry, the importance is reinforced when looking at the needs for different house types within the HEDNA. The type of accommodation needed within Coventry is closely aligned with that required within Warwick and Stratford-On-Avon Districts and shows a clear need for family-sized market accommodation i.e. 3-bedroom houses (40%). Given the finite supply of land within Coventry and the recent trends towards the delivery of smaller units and PBSA, there is a clear need to ensure that allocations are made that can provide for a range of house types, in particular family-sized accommodation. This is crucial to help meet Coventry's housing needs and the Local Plan Review's intent to deliver the housing requirement entirely within Coventry's boundaries is likely to further constrain the		

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						circumstances are to justify removal of this 35% uplift to the Standard Method figure. It is important to note that the HEDNA recommends the inclusion of this uplift as part of its assessment of housing need across Coventry and Warwickshire, however this is ignored by the Local Plan Review. Coventry, as the sub-regional centre, should clearly be taking a leading and pro-active role in meeting its identified housing need and to omit the urban uplift against national policy is an unsound approach. Iceni, the Council's consultants, support a deviation from the 2014 projections but they continue to apply the standard framework method to the revised figures. Having arrived at a revised figure, Iceni continue to apply the other elements of the standard method including, crucially, the application of the urban uplift. This is the approach Iceni have adopted for other studies elsewhere, for example in Birmingham and in Leicester and Leicestershire. Coventry's suggested approach is contrary to its own evidence base, which includes the 35% uplift. This revised approach appears to attempt to reduce the housing requirement as much as possible without any clear justification as to what exceptional circumstances exist to support this position. The Council needs to be clear and explicit in the choices it is seeking to make and apply the tests in NPPF to see if it is justified in doing so. Paragraph 35 of the NPPF is explicit in	type of housing that can viably and feasibly be delivered in the City. It is therefore clear that Coventry must work with its neighbours to find suitable land for the delivery of family housing to ensure that the needs for housing for all parts of the community are satisfied, in line with paragraph 63 of the December 2023 NPPF. This issue cannot simply be deferred until the next local plan review as the shortfall will continue to compound and worsen in years to come – it is critical that this issue is addressed head-on by the Local Plan Review. For the reasons set out above, CEG consider that the plan's failure to justify deviation from the standard method, failure to plan for the urban uplift and to plan proactively for the type of housing that is required means that Policy DS1 is not effective, nor positively prepared and is therefore unsound. Whether against the selected housing requirement or an uplifted requirement as dictated by the December 2023 NPPF, suitable sites capable of delivering family housing, such		

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						that plans are 'sound' if appropriate strategies are justified, taking into account reasonable alternatives, and based on proportionate evidence. At present, it is strongly suggested the Councils approach is unsound as there is no justification for the removal of the urban uplift or deviation from the use of the Standard Method. The Council state that their housing need will be delivered fully within the Council's administrative area through an urban and brownfield-focused strategy. CEG have serious concerns regarding this approach particularly given the worsening affordability of family housing, the finite supply of land within Coventry and the over-reliance on smaller units and Purpose-Built Student Accommodation (PBSA) to meet the housing requirement, both historically and looking forward. Housing affordability is an ongoing and increasing pressure which will require a proactive approach to address. Furthermore, when considering Coventry's needs and the type of development that has taken place and is needed in the future, it is critically important that housing is delivered which meets the needs of the whole population. The 2023/24 Annual Monitoring Report ("AMR") for Coventry indicates that housing delivery is ahead of the overall requirements established in the adopted Local Plan. However, of 1,859 completions 837 (45%) of these were PBSA, compared to 1,022 (55%) residential dwellings. It is	as Westwood Heath, need to be identified and their delivery supported. This requires working collaboratively with neighbouring authorities such as Warwick District Council now under the Duty to Cooperate given the scarcity of suitable land within Coventry. Officer comment: See full representation for additional information		

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						clear that Coventry's housing needs are not based upon the provision of over half of new dwellings required to be student accommodation and CEG considers this must be addressed in planning for future delivery. The 837 (45%) of dwellings delivered as student accommodation were in the form of flats/apartments specifically for student living. This type of housing delivery severely impacts the delivery of affordable housing which has been continually declining throughout the plan period, as PBSA is exempt from affordable housing contributions in Coventry. From a peak of 39% in 2012/13 the general trend for affordable housing completions as a percentage of the overall number has continued to decline with only 9.7% of overall completions being affordable in 2023/24. The affordable housing need identified in the Table 8.13 of the HEDNA is 1,887 dwellings per annum. When this is compared to the Council's selected housing requirement in the Local Plan Review of 1,455 dwellings per annum, affordable housing need would equate to 129% of the housing requirement using the trend-based projections. The selected housing requirement will quite clearly result in a significant level of unmet affordable housing need that will not be delivered if the Local Plan Review proceeds in its current form.			

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Nexus Planning on behalf of CEG Land Promotion (ID39)	5.1 onwards	N	N	N	Y	CEG strongly object to the approach of Policy H1 as it is unsound as set out below. As already outlined in the response to Policy DS1, CEG object to the Council's proposed housing requirement. CEG also consider that the Council will need to work with neighbouring authorities through the duty to cooperate to meet both its overall need, assuming this is uplifted to include the 35% urban uplift, and to meet the demand for different types of housing unlikely to be delivered within Coventry's boundaries. In this regard, the Council should support development at the safeguarded land within the Warwick District Local Plan (Policy DS21 – S1) which is adjacent to the safeguarded land in the Coventry Local Plan (Policy GB2), under the Duty to Cooperate. CEG are also promoting wider land holdings to the South of Coventry, adjacent to the safeguarded land, which offers a wider opportunity to accommodate Coventry's housing need in a sustainable location that has a strong spatial relationship with the city. The site is being promoted by CEG for development as part of the South Warwickshire Local Plan ("SWLP") and has been confirmed as suitable for development and also identified as a Spatial Growth Option in the Preferred Options consultation document. Coventry, through the duty to cooperate, should support development of the safeguarded land (Policy DS21-S1 of the Warwick District Local Plan) at Westwood Heath and a spatial strategy that seeks to direct wider housing growth to the south of	Policy DS20 'Directions for Growth South of Coventry' of the WDLP acknowledges the transformational change that could occur in the area and commits Warwick District Council (WDC) to an early partial review within five years of the date of adoption of the plan (Summer 2022). The policy is clear that this will allow the Council to address any additional evidence regarding the need and potential for development in this area and in particular to ascertain whether necessary infrastructure has become available to allow safeguarded land to be brought forward to meet local housing need. The Coventry City Local Plan (the subject of this review) similarly safeguarded an area of land south of Westwood Heath Road (Policy GB2) which would be released upon a review of the plan and clarity on development proposals within Warwick District. Having regard to the above, WDC subsequently commenced preparation of a wider south of Coventry masterplan framework, which is now in progress. Sustainable Location The site benefits from	Although the SA is cited via para. reference in the rep there seem to be no comments specifically in terms of the SA itself	No change

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						Coventry. Further details of the safeguarded land and the wider land to the south of it, described collectively as “the site” is provided below.	easy access to a range of services and facilities. It is not subject to any landscape designations, it is located within Flood Zone 1 and does not contain any designated heritage assets. Whilst situated wholly within the Green Belt, circa 30 ha of the site is identified as safeguarded land (to meet longer term strategic development needs) through Policy DS21 of the WLP. Part of the site is located adjacent to and south of the Westwood Heath Road and would form a natural extension to the existing residential area. It benefits from having direct frontage along the Westwood Heath Road thus enabling a new junction to be accommodated to access the development. A number of local facilities including the Westwood Academy Secondary School, recreational pitches, a Sport and Wellness Hub, and convenience food stores are in the immediate vicinity of the site. Tile Hill station offering connections to Birmingham and London) is 1.4km away and Coventry City Centre is 6.4km and is accessible by Bus and Cycle. Local bus stops are within a comfortable		

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							walking distance from the site along within the University of Warwick's main campus making public transport a genuine option for travel. The site benefits from excellent pedestrian infrastructure with continuous footways on the North side of Westwood Heath Road which can be enhanced. Similarly, the proximity to the campus will facilitate access to existing cycle infrastructure and this will be integrated with the green travel corridor providing links into Coventry and across the area. This corridor also has the potential to integrate with wider connections to the HS2 interchange at Arden Cross. The site is therefore in a highly sustainable position that benefits from excellent public transport linkages. Development in this location would provide a significant level of market and affordable housing and supporting community infrastructure. It would also help facilitate the delivery and provide financial contributions towards a green-travel corridor which would facilitate an improved southern access to The University of Warwick. These		

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							infrastructure improvements will align with the significant transport improvements already being implemented in the area, including the improvements at the A46 Stoneleigh Junction and the new crossing of the A45, which would, in its own right, deliver significant social and economic benefits locally and at the subregional level. Our proposals would also align with the opportunities identified by WDC through the planned preparation of a wider south of Coventry masterplan. At this stage, a 'Conceptual Framework' is provided (enclosed to these representations) to outline how development of Westwood Heath could sustainably be delivered across land ownerships. This demonstrates that the site can address site specific considerations, comprising the following development within CEG's control: · Circa 2,500 market and affordable dwellings of a type that will make a significant contribution to specific housing needs, divided as follows: - Circa 650 within the		

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							safeguarded land; and - Circa 1,850 dwellings within wider land. · Employment/commercial development in a strategic location to offer collaboration opportunities between business and the university; · Significant community infrastructure provision including a neighbourhood centre, a 2 FE primary school, sports pitches, public parkland and biodiversity parkland; · A substantial network of green infrastructure with green corridors that will provide opportunities for sustainable travel and recreation. This will build upon a local neighbourhood concept; · New movement corridors to help address existing traffic and associated environmental issues within Coventry and aligning with ongoing infrastructure improvements in the area, improving access to the University with the potential to facilitate access to the HS2 interchange at Arden Cross; · Ensuring development avoids coalescence between settlements through keeping development to the North of HS2; and ·		

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							Strong connectivity to Coventry and the University of Warwick's main campus, supporting its role as a Major Investment Site Overall, the proposals represent a highly sustainable option growth option that can deliver a range of substantial benefits. Whilst it will be a matter for the SWLP to comprehensively consider the substantial benefits that can be delivered through large scale growth at Westwood Heath through a strategic growth corridor, it is considered that there will be substantial benefits to Coventry City through development in this location. Whilst this will be a matter for the Duty to Cooperate it is noted that paragraph 11a of the NPPF states that plans should positively seek opportunities to meet the development needs of their area. Therefore, it is considered that this local plan review should reaffirm Coventry City Council's support for growth south of Coventry, specifically at Westwood Heath.		
Keith Whitehead	4.10, 4.12,			N	Y	Regulation 19 representation regarding the Sustainability Appraisal		The policies of the plan	No change

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to CooperateY/N	Legally CompliantY/N	SoundY/N	Does respondent wish to appear at EIPY/N	Representation	Respondent changes requested	Council response	Proposed change
ad (ID25)	5.19, 7.16					The Sustainable Appraisal (SA) is not sound because the claimed protections for sustainability can be effectively removed by the policies that the SA refers to. <i>4.108 Nature & Biodiversity: The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain important objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated and should provide sufficient mitigation such that effects from new development will be at least neutral with regard to GB land for both options. All development will have to meet with the national requirements for BNG indicating positive effects.</i> <i>“secure biodiversity gain and improve the wider ecological network remain important objectives” “that effects from new development will be at least Neutral”.</i> These are admirable statements but as has been already seen in the developments north of Whitley biodiversity net gain assessments, where the assessment was not at least neutral but actually negative.		are designed to deliver protection where applicable . The council considers its approach to be sound	

Local Plan Review

Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
						"The current adopted Plan has policies to protect nature and biodiversity". This is untrue if the land has a strategic allocation applied to it. From Policy GE3 2. <i>Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased.</i> So the developer is given a route to just pay money and not deliver at least neutral biodiversity gain. From Policy GE2 1. <i>Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation.</i> This gives a developer two avenues to avoid delivering at least neutral biodiversity gain, 1) pay for a report that says the land is of no value for amenity, recreational and/or community use, 2) If land is part of a strategic land use allocation. <i>4.129 Nature & Biodiversity: The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such that there will be no major significant negative effects. The Council will continue to allocate</i>			

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
						<i>employment development sites to PDL and new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty as depends upon locational specificity. All development will need to meet with the national requirements for BNG, indicating positive effects.</i> <i>“The current adopted Plan has policies to protect nature & biodiversity”. This is untrue if the land has a strategic allocation applied to it.</i> <i>From Policy GE3 2. Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased. So the developer is given a route to just pay money and not deliver at least neutral biodiversity gain.</i> <i>From Policy GE2 1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation. This gives a developer two avenues to avoid delivering at least neutral biodiversity gain, 1) pay for a report that says the land is of no value for amenity, recreational and/or community use, 2) If land is part of a strategic land use allocation.</i>			

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Regulation 19: Summary of Representations

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						5.19 The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt and Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements⁷⁵ for Biodiversity Net Gain (BNG) – and Coventry has established practice through such an approach with its BNG SPD (2022)⁷⁶. Therefore, positive effects but uncertainty of precise significance as this depends on detailed project design. “The current adopted Plan has policies to protect nature and biodiversity”. This is untrue if the land has a strategic allocation applied to it. From Policy GE3 2. Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased. So the developer is given a route to just pay money and not deliver at least neutral biodiversity gain. From Policy GE2 1. Development involving the loss of green space that is of value for amenity, recreational and/or			

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to CooperateY/N	Legally Compliant Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	Council response	Proposed change
						<i>community use will not be permitted unless specifically identified as part of a strategic land use allocation. This gives a developer two avenues to avoid delivering at least neutral biodiversity gain, 1) pay for a report that says the land is of no value for amenity, recreational and/or community use, 2) If land is part of a strategic land use allocation.</i> <i>5.19 The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt and Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements⁷⁵ for Biodiversity Net Gain (BNG) – and Coventry has established practice through such an approach with its BNG SPD (2022)⁷⁶. Therefore, positive effects but uncertainty of precise significance as this depends on detailed project design.</i> <i>“The current adopted Plan has policies to protect nature and biodiversity”. This is untrue if the land has a strategic allocation applied to it.</i> <i>From Policy GE3 2. Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be</i>			

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to CooperateY/N	Legally CompliantY/N	SoundY/N	Does respondent wish to appear at EIPY/N	Representation	Respondent changes requested	Council response	Proposed change
						<i>purchased. So the developer is given a route to just pay money and not deliver at least neutral biodiversity gain.</i> <i>From Policy GE2 1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation. This gives a developer two avenues to avoid delivering at least neutral biodiversity gain, 1) pay for a report that says the land is of no value for amenity, recreational and/or community use, 2) If land is part of a strategic land use allocation.</i> <i>7.16 A Habitats Regulations Assessment (HRA) Screening (August 2024) concluded that there is no requirement for the Coventry Local Plan to include any policy regarding European and internationally designated sites for nature conservation. Policy GE3 continues to protect national and locally important biodiversity and has been updated to incorporate the new national minimum requirement for 10% net gain in biodiversity for all new development. Policies GE2-3 with minor updating continue to provide information and guidance such that the green/blue infrastructure network in the plan area should be enhanced, particularly in the longer term and networks are linked, widened and become more established with overall positive effects for SA objectives for nature and biodiversity.</i>			

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						<i>“Policy GE2 with minor updating continue to provide information and guidance such that the green/blue infrastructure network in the plan area should be enhanced”.</i> This is untrue if the land has a strategic allocation applied to it. From Policy GE3 2. <i>Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased.</i> So the developer is given a route to just pay money and not deliver at least neutral biodiversity gain.			
Joscelyn e Bigham (ID23)	1.5, 1.6, 6.29, 6.30 7 6.31	N	N	N	N	‘It is a requirement to consider if the plan is likely to have significant effects on the integrity of any relevant designated site.’ There are inaccuracies within the HRA Screening document which need to be addressed and its conclusion regarding the effects on the Severn Estuary SAC/Ramsar site will need to be reevaluated. Consult with Natural England and use up to date online resources such as Environment Agency’s Statutory Main River Map and Catchment Data Explorer. Officer comment: refer to representation on HRA Screening Report for more information.		The HRA is considered to be accurate and fit for purpose	No change
Joscelyn e	7.9, 7.13	N	N	N	N	To achieve SA objectives public transport links with to Coventry’s TTWAs within Warwickshire need to be addressed.		Noted	No change

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Regulation 19: Summary of Representations

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Bigham (ID23)	& 7.14					To tackle poor air quality, measures need to be put into place to reduce through traffic and to limit HGV movements along the B4113 and its side roads (Bedworth Road–Longford Road–Foleshill Road). Officer comment: for further information, refer to the representations from this representor on policies JE5 and AC7.			
Joscelyn e Bigham (ID23)	4.28-4.34, 5.7 & 5.8	N	N	N	N	Officer comment: No specific response cited, For further information, refer to the representation from this representor on policy H11.		Noted	No change
Joscelyn e Bigham (ID23)	3.13					Officer comment – no specific response cited in relation to the paras cited. For further information, refer to the representation from this representor in the ‘general’ representations section.		See officer comment on the representation	No change
Home Builders Federation (ID21)	All	N	N	N	Y	3. HBF note that our request for a full Green Belt review would require additional Sustainability Appraisal work. We would welcome the opportunity to comment on a revised SA as part of the Green Belt review. 4. The current Sustainability Appraisal should have considered a higher level of growth and the impacts	A full green belt review would require additional SA work.	Noted however a full Green Belt Review is not considered to be required.	No change

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						of a full Green Belt review and meeting housing and employment needs in full. Officer comment: Please refer to all policy representations made by this representor			
Stantec on behalf of HGIT Central Coventry Ltd (ID57)	All			N	Y	Please see associated representation. The SA is only considered to have appropriately reviewed brownfield sites in relation to residential uses rather than bringing employment sites back into full economic use. Officer comment: Please refer to all policy representations made by this representor		The scope of the SA is considered proportionate to the scope of the Local Plan Review and it considers employment matters.	No change
WWT (ID71)	All		N	N	N	The Sustainability Appraisal hasn't considered environmental impacts and particularly Local Wildlife sites and Potential Local Wildlife Sites in detail.		The Local Plan Review does not	No change

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						The plan allocates land in the green belt, Courdon wedge and near to important Local Wildlife Sites without a clear assessment of environmental impacts and alternative sites considered in detail.		new growth in the Green Belt, Coundon Wedge nor on or near wildlife sites. It is a brownfield-first strategy.	
Sally Rees (ID50)		N	N	N	Y	Officer comment: Please refer to full representation in the 'general' section. Included here as the letter makes reference to the 'failure to consider a dispersed housing strategy'.		A range of spatial options have been appraised which are proportionate to the scope of the plan review,	No change

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								and realistic in terms of the options in a tightly constrained administrative area.	
NHS Coventry and Warwickshire Integrated Care Board (ID40)	All	Y	Y	Y	N	Officer comment: Please refer to full representation in the 'general' section, there are no specific comments on the SA itself although it says 'all' on the response form.		See officer comment in the representation section	No change
WWT (ID71)	All		N	N	N	Justified – the plan and 'Sustainability Appraisal' hasn't considered alternatives sites in enough detail, away from Local Wildlife Sites and environment assets and there's not enough previous consultation on housing sites. Allocations are also on land within the Green Belt, an important buffer for protected and important species know to use the area.		The plan review has assessed sites and considers the selection	No change

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Respondent / organisation / agent	Section	Complies with Duty to CooperateY/N	Legally CompliantY/N	SoundY/N	Does respondent wish to appear at EIPY/N	Representation	Respondent changes requested	Council response	Proposed change
								to be appropriate	

Habitats Screening Report

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Joscelyne Bigham (ID23)	HRA Screening report (paragraph 4.1 7-5.2)	N	N	N	N	The HRA Screening Report appears to be inaccurate with its statements regarding Coventry's Main Rivers and the use of terms. Furthermore, the conclusion does not appear to have considered that the Local Plan area is hydrologically linked with the Severn Estuary SAC/Ramsar site through the River Sowe tributary of the Warwickshire River Avon. The HRA Screening Report states that 'a requirement for HRA will continue as set out in the Conservation of Habitats & Species (Amendment)(EU Exit) Regulations (2019).' Therefore, if there is an issue with the accuracy of the HRA and the validity of its conclusions, it could have an impact on whether the Local Plan Review is considered to be legally compliant and/or sound.	Rewrite the HRA to address the inaccuracies highlighted in the previous section and reevaluate the conclusion in light of the River Sowe being functionally-linked habitat for the...Severn Estuary SAC/Ramsar site.' Consider using the text from Nuneaton and Bedworth Borough Council's HRA Addendum.	The HRA is considered to be accurate and fit for purpose.	No change

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						Has the Environment Agency's Statutory Main River Map and Catchment Data Explorer been used as a reference? 'The statutory main river map is a spatial (polyline) dataset that defines statutory watercourses designated by the Environment Agency as main rivers.' 'The Catchment Data Explorer is designed to help you explore and download information about the water environment used in River Basin Management Plans. You can find catchments and water bodies of interest using a map, or by searching for names, view summary information about catchments, download data and follow links to other useful sites.' On looking at these maps, a confluence of the River Sherbourne with the River Sowe appears to take place just south of the A45 near Baginton. The River Sowe's confluence with the River Avon occurs further downstream, south of Stoneleigh. Therefore, would it not be more accurate to say that the River Sherbourne is a tributary of the River Sowe and that the River Sowe is a tributary of the River Avon? This needs to be clarified.			

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						In terms of the River Avon, the HRA also states that 'the river runs to the southwest passing within about 5 km of the administrative boundary for Coventry.' Could this be clarified? At the point where it flows underneath the A45, it appears to be within 1km of the City's administrative boundary at Rowley Road and a small section of the boundary appears to run along the rivers' course in between London Road and Siskin Drive. There appear to be other watercourses marked on the Statutory Main River Map as Main Rivers. Even if they do not have 'river' in their names, should they still be referenced within the HRA? Canley Brook? Withy Brook? There is also concern as to why habitats sites have been 'screened out for appropriate assessment with regard to water quality.' If the River Sowe is a tributary of the River Avon, surely it (and its tributaries) is hydrologically linked with the Severn Estuary SAC/Ramsar site. Furthermore, the River Sowe (and its tributaries) could potentially become part of a Local Nature Recovery Strategy (LNRS) in the future. As such, it would be ideally placed to tackle issues such as water quality, nature recovery, environmental inequity and climate			

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						change through natural flood management (NFM) schemes. Although they are not a 'responsible authority', CCC will still be required, as a planning authority, to produce a Biodiversity Report and this will involve giving details on how LNRS has been considered. For the West Midlands, it is the West Midlands Combined Authority (WMCA). For Warwickshire, the responsible authority is Warwickshire County Council, working with the Local Nature Partnership. The Habitats Regulations Assessment of the Nuneaton and Bedworth Local Plan Review Addendum October 2024, states, '2.1 In their response to the consultation on the Local Plan Review and its HRA, Natural England observed that the Plan area is located upstream of the Severn Estuary Special Area of Conservation (SAC) and Ramsar Site (approximately 96km to the south-west) and is hydrologically linked to the designated sites through the River Sowe tributary of the Warwickshire River Avon' '2.2 The Severn Estuary migratory fish species (Atlantic salmon, sea trout, allis shad, twaite shad, sea lamprey, river lamprey and European eel)			

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						travel upstream through the River Severn and its tributaries, spending part of their life cycle in the wider Severn hydrological catchment. Currently the tidal weir at Tewkesbury is Page 6 of 19 believed to present an obstacle to most of the migratory fish species, with the exception of the European eel, which has been recorded within the Warwickshire Avon... It is also understood that European eel have been recently recorded in the River Sherbourne, which is a tributary of the River Sowe. There is therefore the possibility of these species being present during the Plan period within the...River Sowe (and possibly tributaries) which would render these rivers functionally-linked habitat for the...Severn Estuary SAC/Ramsar site.' Would it be possible to include a similar text within Coventry City Council's HRA? Where relevant, the Local Plan should identify locations (strategic employment/housing sites, local wildlife sites, potential local wildlife sites and local nature reserves) which are hydrologically linked with the Severn Estuary SAC/Ramsar site. It needs to ensure that there is appropriate assessment regarding water quality and quantity/flow/levels and that measures are put			

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						into place to improve water quality and conditions for migratory fish such as European eel.'			
Natural England (ID37)						Habitats Regulations Assessment (HRA) Natural England notes the Habitats Regulations Assessment prepared in support of the plan. We agree with your conclusions with regard to Ensor's Pool Special Area of Conservation and the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar.			

Comments on Local Plan Appendices

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Transport for West Midlands - West Midlands Combined	Appendix 6	Y	Y	Y	N	N/A	Appendix 6 still references the NPPF from December 2023 –clarification is needed on whether this will be updated.	The plan is being examined under the 2023 NPPF	No change

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Respo ndent / organ isation / agent	Sect ion	Comp lies with Duty to Coop erate Y/N	Legall y Comp liant? Y/N	Sou nd Y/N	Does respo ndent wish to appe ar at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
Autho rity (ID67)									
Trans port for West Midla nds - West Midla nds Combi ned Autho rity (ID67)	App endi x 6	Y	Y	Y	N	N/A	Table 1 (Cycle Parking Standards) – Given the aspirations for cycling growth, are the proposed cycle parking allocations ambitious enough? E.g. for hotels, the standard of 1 space per 10 staff members if required suggests a low expectation for cycling uptake.		
Trans port for West Midla nds -	App endi x 6	Y	Y	Y	N	N/A	Table 1 (Car Parking Standards) – Is a 1:1 car parking ratio per dwelling size ambitious enough to encourage modal shift?	The Council considers this to be appropriate	No change

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Regulation 19: Summary of Representations

Respo ndent / organ isation / agent	Sect ion	Comp lies with Duty to Coop erate Y/N	Legall y Comp liant? Y/N	Sou nd Y/N	Does respo ndent wish to appe ar at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
West Midla nds Combi ned Autho rity (ID67)									
Keith White head (ID25)	App endi x 6			N	Y	Details of the Local Plan Review is not sound Regulation 19 Proposed Submission Appendices December 2024 Appendix 6 <i>1.5 The Transport Strategy notes the continued widespread reliance on the car across the city whilst also setting out the “Case for Change” and the priority of modal shift away from the private car. To this end, the aim of these parking standards is to enable appropriate and consistent levels of car parking across the city whilst encouraging behaviour change towards public transport and active travel in the most accessible areas of the city.</i>	Modifications considered necessary to make the Local Plan Review sound This representation includes suggested changes relating to but not limited to Business/Research & Development, Light or General Industrial car parking. Staff parking. Should be very restricted. Currently car use is the easy option,	Noted. The council considers this approach to be sound however this matter should be considered in conjunction with the review of the transport policies (AC) section	No change

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Regulation 19: Summary of Representations

Respo ndent / organ isatio n / agent	Sect ion	Comp lies with Duty to Coop erate Y/N	Legall y Comp liant? Y/N	Sou nd Y/N	Does respo ndent wish to appe ar at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Appendix 6 recognises the challenge of widespread reliance on the car. For car users, the car is the first and easiest choice for travel. It is immediately available, it is your personal environment (music etc), it is usually the quickest form of travel and it can be argued that it is cheaper than public transport. Having staff parking places at sites of employment strengthens the choice to use a car to get to work contrary to Coventry's Climate Change Strategy 2024-2030 with its an objective to reduce congestion. Hence the choice need re-balancing to make public transport attractive. As this Local plan is meant to cover developments up to 2041, the standard needs to be far more challenging and recognising the challenges of climate change and be sound for 2030 and beyond. The area that is considered unsound is parking at a place of employment. Travel plans can be works of fiction and employees can ignore what is written in a travel plan. Many will prefer to drive	this has to change. Having car parks for staff parking encourages staff to drive to work. The parking standards should be designed for staff to travel by anything other than a car. Coventry suffers from congestion at peak times, particularly heading into the City in the morning and out of the City in the afternoon. The parking standards should be different with very few staff parking places. With the reduction in car parking spaces there will be more space available for employment. Here are		

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						to or as near as possible to their place of work and that can lead to congestion and antisocial parking. This representation includes but is not limited to Business/Research & Development, Light or General Industrial. Staff parking should focus on bulk transport (public or private) to and from the site. Bulk transport hubs could be car parking adjacent to good trunk roads or good public transport. These bulk transport hubs could be located out of town and hence taking traffic away from the centre and away from the sites of AM and PM traffic congestion.	some ideas and if required they can be expanded. The primary means for staff travelling to work should be using bulk transport. By this I mean public transport, private mini bus/bus/train/shuttle etc. Those employees that have to use a car should be able to use a parking location that does not add to congestion and from there be able to use bulk transport of some sort to transport them to their place of work.		
Home Buide rs Feder ation	App endi x 8	N	N	N	Y	Appendix 8 Monitoring Framework <i>The Monitoring Framework is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy</i>	Please refer to representation	The monitoring framework is considered to be appropriate and measures	No change

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(ID21)						142. The Plan should expand the Monitoring Framework in Appendix 8 to ensure that that it sets out clear targets for housing (and other matters) that will be monitored and the triggers for action being taken, and what that action will be. Monitoring is essential to see if the Plan is delivery housing as expected. The monitoring framework is part of the way that the Plan delivers the flexibility is needed, so that the Council is able to respond to any changing circumstances.		against housing targets	
National Highways (ID36)	Appendix 7	Y	Y	Y	N	The Infrastructure Development Plan (IDP) aims to set out the infrastructure required to accommodate the anticipated growth and how this is to be delivered. Appendix 7 provides an overview summary of what an IDP document is and focuses on highways, public transport and supporting accessibility infrastructure which have been identified by modelling which was used to identify the range of schemes that will be essential to the delivery of the new homes and		Noted and will be picked up through Duty to Co-operate discussion, and the IDP will be updated to provide the latest	Updated IDP for the examination which reflects the latest position

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						jobs across Coventry. NH would like to get a better understanding and evidence behind the transport modelling that supports this local plan. The Infrastructure Delivery Plan proposes a number of schemes relevant to the SRN in and around the CCC area. We recognise the Council's proposals for a number of multi-modal transport schemes to provide greater choice of sustainable transport options, including implementing cycleways, light rail and new rail stations across the city. We acknowledge that the provision of these services particularly in areas adjacent to the SRN (such as Binley, Coventry South & Willenhall) is likely to reduce private car trips on the SRN, therefore is supported by NH. It is noted that the Coventry Very Light Rail (CVRL) scheme would expand the range of multi-modal travel options to access key sites across the city. NH would be keen to engage with the Local Planning Authority (LPA) to understand the		information available	

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Regulation 19: Summary of Representations

Respondent / organisation / agent	Section	Complies with Duty to Cooperate Y/N	Legally Compliant? Y/N	Sound Y/N	Does respondent wish to appear at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						interaction of wider CVLR proposals with the SRN, including ambitions to extend the scheme into Ansty Park. Out of the 44 transport related schemes listed within the IDP, three are related to the enhancements along the M6 and A46. As stated within the document, the schemes represent “clear commitments to using infrastructure to unlock growth not just for Coventry but jointly with Nuneaton and Bedworth and Rugby Borough Councils respectively”, therefore displaying the on-going commitment to the Duty to Cooperate between neighbouring Councils, the County Council and NH. As a statutory consultee, NH require engagement on any development that impacts the SRN, specifically this applies to the following IDP proposals as these are located on our SRN network: • A46 Walsgrave Junction Improvements; • A46 Strategic Link Road; and			

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						M6 Junction 3 Improvements. NH would like to gain a better understanding behind the funding for the schemes as well as the status of each, as it is unclear if these are committed schemes. We would also like to understand any potential gaps in the funding for the proposed developments. We would also like to understand any interlinkages between the various schemes and the potential causation effect if one of the proposed schemes is not followed through, and how this could impact the funding and fruition of other schemes. Similarly, NH is aware of our funding towards the A46 Coventry Junctions (Walsgrave) DCO scheme (TR010066), which was accepted for examination in December 2024. However, we are not leading the improvements related to the other two schemes on the SRN network.			

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						It should be noted, for any developments which have an impact on neighbouring Local Authorities, NH advises a joined up approach in which NH, Coventry and the other LAs attend the same meeting with the future developer or applicant. This will ensure all parties interests are protected and a combined solution is derived during the planning process.			
NHS Property Services (London Office)(ID41)	Infrastructure Delivery Plan (Appendix 7)				N	The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to the level of growth proposed by the Plan, and to ensure that both planning obligations and the capital allocation process for the Community Infrastructure Levy (CIL) effectively support and result in capital funding towards delivery of the required infrastructure. To ensure planning obligations effectively support the delivery of required infrastructure, the IDP and accompanying Draft Infrastructure Delivery		The Council has been, and will continue to actively engage with the ICB and the Local Estates Forum, and the IDP includes a link to ICB's own infrastructure delivery strategy and programme to ensure	No change to the local plan but the IDP will be updated where necessary.

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Respo ndent / organ isatio n / agent	Sect ion	Comp lies with Duty to Coop erate Y/N	Legall y Comp liant? Y/N	Sou nd Y/N	Does respo ndent wish to appe ar at EIP Y/N	Representation	Respondent changes requested	CCC response	CCC suggested proposed change to DPD where applicable
						Schedule should include sufficient detail on the necessary healthcare infrastructure required to accommodate the level of growth proposed by the Local Plan. We recommend that the Council and developers engage with the ICB throughout all stages of the planning process. This will ensure that site-specific healthcare infrastructure demands are appropriately assessed, and that necessary health mitigation options align with both NHS requirements and the ICB's approach to securing future healthcare provision.		requirements are kept up to date. It should be noted that Coventry City Council does not operate CIL.	