



Coventry City Council

Coventry Local Plan Review

# Regulation 19

# Proposed Submission

December 2024

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## Contents

.....	0
<b>1. Introduction .....</b>	<b>6</b>
<b>2. The Vision .....</b>	<b>9</b>
<b>3. Overall Levels of Growth and the Duty to Co-operate .....</b>	<b>14</b>
<b>4. Health and Wellbeing .....</b>	<b>25</b>
<b>5. Jobs and Economy .....</b>	<b>28</b>
<b>6. Delivering Coventry’s Housing Needs .....</b>	<b>43</b>
<b>7. Retail and Centres .....</b>	<b>71</b>
<b>8. Communities .....</b>	<b>81</b>
<b>9. Green Belt and Green Environment .....</b>	<b>87</b>
<b>10. Design .....</b>	<b>97</b>
<b>11. Heritage .....</b>	<b>104</b>
<b>12. Accessibility .....</b>	<b>111</b>
<b>13. Environmental Management .....</b>	<b>130</b>
<b>14. Coventry City Centre .....</b>	<b>163</b>
<b>15. Infrastructure Delivery, Implementation and Monitoring .....</b>	<b>174</b>

## Appendices:

- 1. Table of reviewed policies for the Local Plan and Area Action Plan
- 2. Marketing Guidance for Policies JE3 and CO2
- 3. Housing Trajectory
- 4. Ancient Woodlands Map and List
- 5. Heritage Park and Route
- 6. Cycle and Parking Standards for New Development
- 7. Infrastructure Delivery Plan
- 8. Monitoring Framework
- 9. Designation & Allocation Maps
  - a. Key Employment Sites
  - b. New / Amended Housing & Mixed Use Allocations

- c. Affordable Housing Policy H6
- d. City Centre Boundary & Transition Zone
- e. Centres & Primary Shopping Areas
- f. City Centre Character Areas

## Abbreviations

Abbreviation	Full Term
<b>AAP</b>	Area Action Plan
<b>AEP</b>	Annual Exceedance Probability
<b>AMR</b>	Annual Monitoring Report
<b>ANGST</b>	Accessible Natural Greenspace Standards
<b>BGS</b>	British Geological Society
<b>BNG</b>	Biodiversity Net Gain
<b>BREEAM</b>	Building Research Establishment Environmental Assessment Method
<b>BREDEM</b>	Building Research Establishment Domestic Energy Model
<b>CIBSE</b>	Chartered Institution of Building Service Engineers
<b>CQC</b>	Care Quality Commission
<b>DEFRA</b>	Department for Environment, Food and Rural Affairs
<b>DtC</b>	Duty to Cooperate
<b>ELR</b>	Employment Land Review
<b>FEMA</b>	Functional Economic Market Area
<b>FRA</b>	Flood Risk Assessment
<b>FWMA</b>	Flood and Water Management Act
<b>GTAA</b>	Gypsy and Traveller Accommodation Assessment
<b>HEDNA</b>	Housing and Economic Development Needs Assessment
<b>HELAA</b>	Housing and Employment Land Availability Assessment
<b>HEM</b>	Home Energy Model
<b>HER</b>	Historic Environment Record
<b>HIA</b>	Heath Impact Assessment
<b>HMA</b>	Housing Market Area
<b>HMOs</b>	Homes in Multiple Occupation

<b>IDP</b>	Infrastructure Delivery Plan
<b>ITS</b>	Intelligent Transport Systems
<b>JLR</b>	Jaguar Land Rover
<b>kWh</b>	Kilowatt Hour
<b>kWp</b>	Kilowatt Peak
<b>LAA</b>	Local Aggregate Assessment
<b>LCRM</b>	Land Contamination Risk Management
<b>LCWIP</b>	Local Cycling and Walking Infrastructure Plan
<b>LETCP</b>	Low Emissions Towns and Cities programme
<b>LLFA</b>	Lead Local Flood Authority
<b>LNR</b>	Local Nature Reserve
<b>LNRS</b>	Local Nature Recovery Strategies
<b>LPA</b>	Local Planning Authority
<b>LTP</b>	Local Transport Plan
<b>MCS</b>	Microgeneration Certification Scheme
<b>MVHR</b>	Mechanical Ventilation with Heat Recovery
<b>MSAs</b>	Mineral Safeguarding Areas
<b>NaCTSO</b>	National Counter Terrorism Security Office
<b>NDSS</b>	Nationally Described Space Standards
<b>NPPF</b>	National Planning Policy Framework
<b>ONS</b>	Office for National Statistics
<b>PBSA</b>	Purpose Built Student Accommodation
<b>PHPP</b>	Passive House Planning Package
<b>PSA</b>	Primary Shopping Area
<b>R&amp;D</b>	Research & Development
<b>SABs</b>	Sustainable Drainage Systems Approval Bodies
<b>SAP</b>	Standard Assessment Procedure
<b>SBEM</b>	Simplified Building Energy Model

<b>SFRA</b>	Strategic Flood Risk Assessment
<b>SPD</b>	Supplementary Planning Document
<b>SSSIs</b>	Sites of Special Scientific Interest
<b>SuDS</b>	Sustainable Drainage Systems
<b>SUE</b>	Sustainable Urban Extension
<b>SWLP</b>	South Warwickshire Local Plan
<b>TER</b>	Target Emissions Rate
<b>TfWM</b>	Transport for West Midlands
<b>UTMC</b>	Urban Traffic Management Control
<b>WMCA</b>	West Midlands Combined Authority
<b>WMSESS</b>	West Midlands Strategic Employment Sites Study

# 1. Introduction

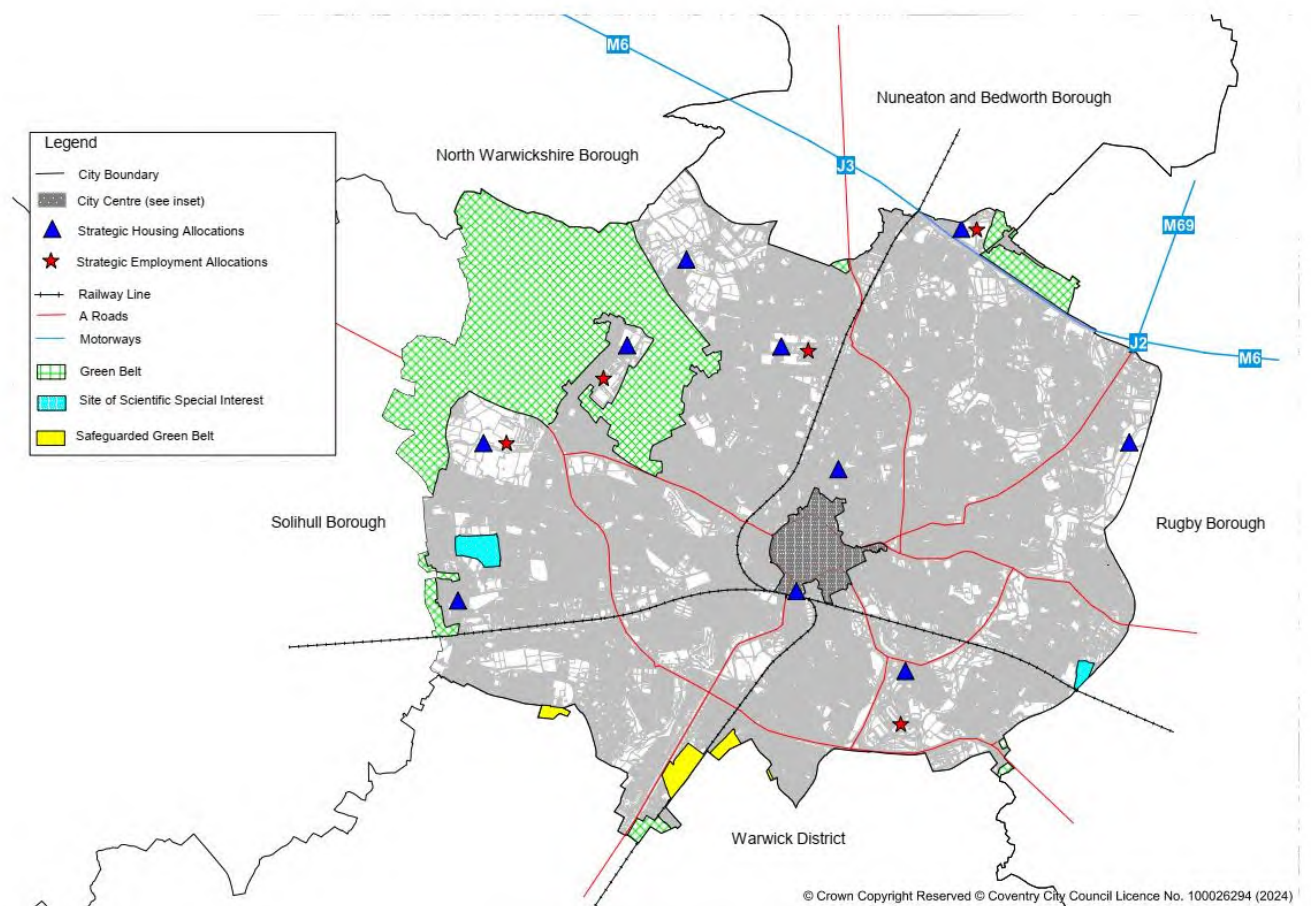
- 1.1 The Local Plan covers the administrative area of Coventry City Council. It sets out where development will go, how much is needed and what kind of development we should provide for, as well as setting out what areas should be protected and improved. It must provide a balance between economic, social and environmental needs.
- 1.2 The policies which the Local Plan contains are used to help decide whether planning applications are acceptable or not. Some policies relate to specific areas and these are shown on the [Policies Map](#). Other policies are criteria based and provide information to help with assessing planning applications.
- 1.3 The Local Plan needs to help deliver the vision, aims and objectives of Coventry City Council and these are set out in the [One Coventry Plan](#). The One Coventry Plan focuses on the economy, skills and education, addressing the needs of an ageing population, addressing health inequalities, and dealing with environmental matters. Planning policies need to help deliver the aims and objectives of the One Coventry Plan.
- 1.4 The Local Plan is a statutory document and has to be prepared in accordance with legislation. It has been prepared under the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 1.5 The [Local Plan and the accompanying Coventry City Area Action Plan](#) were adopted by Coventry City Council on 6<sup>th</sup> December 2017. Councils are required to review their policies every five years to ensure that they remain up to date.
- 1.6 This is the process which has led to the production of this reviewed document. An initial consultation ([Issues and Options](#)) was undertaken from 18<sup>th</sup> July to 29<sup>th</sup> September 2023 to explore areas where it was felt the plan needed to be updated. A number of 'call for sites' consultations were also run, where the Council explored opportunities for accommodating its growth needs especially for housing and employment. The background to the Plan Review can be found [here](#).
- 1.7 Taking into account consultation feedback alongside an updated [evidence base](#), the Council has reviewed the policies of the Local Plan and Area Action Plan (AAP) to bring them up to date.
- 1.8 As this is a review and not a new Local Plan it is important that matters are kept proportionate. To ensure clarity and to avoid unnecessary duplication the Council is proposing to merge the Local Plan and the Area Action Plan into a

single document. In line with national legislation, some policies have now been identified as Strategic Policies: as set out in Planning Practice Guidance (March 2019) these are the ones that address the priorities for an area. Non-strategic policies deal with more detailed matters.

- 1.9 To help understand which policies have changed and why, the Council has produced a summary matrix to sit alongside this document. This shows the current adopted policy, proposed changes to the policy, any deleted or new policies and a short explanation. More detail is contained in a series of topic-based background papers. A Proposals Map has also been produced which shows how the current adopted Policies Map will change. A log of all reviewed policies from the Local Plan and Area Action Plan can be found in Appendix 1.
- 1.10 Local Plans must be prepared in line with **national legislation**. The new government which came into power in July 2024 is making a number of changes to the planning system. **However this plan is being progressed under the current transitional arrangements and is therefore being progressed in line with the [National Planning Policy Framework \(NPPF\) December 2023](#)** so as not to slow progress on work which was already very advanced.
- 1.11 Current legislation, The **Duty to Co-operate (DtC)**, which was introduced through the Localism Act 2011 also requires the council to work closely and constructively with neighbouring authorities and a range of other organisations in addressing strategic issues.
- 1.12 The development of the plan is also informed by a Sustainability Appraisal, Habitats Regulations Assessment and Equalities and Health Impact Assessment.
- 1.13 Once this draft plan (the Regulation 19 Plan), along with its accompanying documents set out in paragraph 1.12, has been consulted on, it will be submitted for Examination in Public by an independent Planning Inspector who will take account of the comments received ('representations') as well as the evidence provided. More detail can be found [here](#) in terms of the process which must be followed.
- 1.14 The current Local Plan runs up until 2031. The reviewed Local Plan will run up until 2041 as Local Plans need to cover at least a 15 year time period.
- 1.15 The geographical area which the Local Plan covers is shown in the diagram below, this relates to the area covered by Coventry City Council and for context also includes the detail of the neighbouring areas.
- 1.16 The Key Diagram below shows the administrative area of Coventry City Council (to which this Local Plan applies), the City Centre boundary, key geographical policies and infrastructure, and the context with the wider sub-region.

## Map 1.1 Key diagram

The Key Diagram is a map showing how Coventry relates to the surrounding area, and the main policy designations.



## 2. The Vision

2.1 The [One Coventry Plan](#) (2022 – 2030) sets out the following Vision:

One Coventry - working together to improve our city and the lives of those who live, work and study here.

We 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.
- a city where our residents get the best possible start in life, experience good health and age well, in a city that embraces diversity, protects the most vulnerable and values its residents and communities.
- a city, that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change.

2.2 The Vision includes three interconnected priorities:

- Increasing the economic prosperity of the city and region.
- Improving outcomes and tackling inequalities within our communities.
- Tackling the causes and consequences of climate change.

2.3 The table below sets out how the Local Plan can help deliver the vision and priorities of the One Coventry Plan, with the key objectives column extracted from the detail of the One Coventry Plan list of commitments for each priority, where applicable to the planning system.

Table 2.1 Delivering the One Coventry Plan

Priority	Key objectives	Key Local Plan policy references
Increasing the economic prosperity of the city and region	Working with the existing businesses in the city to grow and expand, creating new jobs and becoming more resilient to fluctuations in the economy.	Strategic growth policies DS1-4
Developing and building on the strength of our city's economy to deliver inclusive growth, supporting businesses to	Working to secure new inward investment in the city, businesses looking to grow and expand in the UK. Marketing Coventry as an attractive place to invest and create new jobs. When delivering projects across the city we will, where possible, prioritise jobs and skills for local people, use local small businesses and source	Economic policies JE1-7 Housing policies H1-13

<p>innovate, grow and scale up.</p> <p>Capitalising on the green technological revolution to create more local jobs.</p>	<p>materials as locally as possible to try to ensure inward investment into the local area.</p> <p>We will create a sustainable, inclusive transport infrastructure, attracting businesses to invest. This will focus on a substantially improved public transport network, an environment that is much more suited to walking and cycling and harnessing transport links at the forefront of innovation.</p> <p>Continuing to improve the city and develop projects that enable local neighbourhoods to play their part in our economic success.</p> <p>Working with registered providers, charities, and community organisations to deliver more social housing for those who need it most. We will explore options around community-led housing projects, putting meaningful community involvement at the heart of new housing development.</p> <p>We will continue to ensure our city centre remains clean and tidy and offers a diverse range of experiences for residents and visitors to enjoy. By ensuring a high standard of city centre we will continue to attract investment and development making the city a liveable, green and safe place to thrive.</p>	<p>Retail policies R1-6</p> <p>Green and Blue Infrastructure policies GE1 – 4</p> <p>Design policies DE1-2</p> <p>Heritage and Conservation Policies HE1-3</p> <p>Transport policies AC1-7</p> <p>Infrastructure policy IM1</p>
<p>Improving outcomes and tackling inequalities within our communities</p> <p>Focusing on improving outcomes for local people and tackling inequalities in order to build prosperity across the city, protecting the most vulnerable and supporting and valuing the</p>	<p>Effectively delivering the essential services that matter most to our communities.</p> <p>Strengthening our Marmot City approach to ensure it remains at the heart of what we do.</p> <p>Working with NHS partners to encourage healthy lifestyles and provide quality healthcare to all communities across the city.</p> <p>Working with business, residents, partners, and education providers to ensure that all our communities' benefit from job opportunities created by investment in the city.</p> <p>Tackling inequalities through a collaborative approach, with our residents, communities,</p>	<p>Strategic growth policies DS1-4</p> <p>Health Policy HW1</p> <p>Economic policies JE1 &amp; JE7</p> <p>Housing policies H1 – H13</p>

<p>contribution of our residents.</p>	<p>and partner organisations and through alignment with our Health and Wellbeing Strategy.</p> <p>Addressing the needs of those on low incomes with affordable access to quality housing, heating, and insulation.</p> <p>Protecting children and supporting families to give children the best start in life.</p> <p>Improving social, emotional, and mental health and well-being of our residents by enabling people to live independently where possible.</p> <p>Supporting our most vulnerable – including people who are street homeless, experiencing mental ill health and the integration of our refugee and migrant communities.</p>	<p>Community policies CO1-3</p> <p>Green &amp; Blue Infrastructure Policies GE1 – GE4</p> <p>Design Policies DE1-2</p> <p>Transport Policies AC1, AC4, AC5, AC6</p> <p>Environmental Management policies EM1, EM4, EM7, EM11, EM13, EM15</p> <p>Infrastructure policy IM1</p>
<p>Tackling the causes and consequences of climate change</p> <p>Having a relentless focus on tackling the causes of climate change and mitigating the inevitable consequences of this, to ensure the well-being of our residents and position Coventry as a leader and pioneer of the green industrial revolution.</p>	<p><u>Low Emission Development</u></p> <p>Investing in the development of technology solutions with businesses, universities, and partners to increase the adoption of new efficient, zero carbon renewable energy generation technologies. Promoting and supporting inward investment of zero carbon technologies in making the city a global market leader in a clean and green transport e.g., Very Light Rail and encouraging residents, communities, and businesses to take up active and green forms of travel.</p> <p>Encouraging green behaviours from everyone that lives, works or visits the city, and working with schools to implement sustainability into the curriculum in a holistic way.</p>	<p>Sustainable development policy DS3</p> <p>Health policy HW1</p> <p>Employment policies JE1 - JE7</p> <p>Housing policies H1 – H13</p> <p>Community policies CO1-3</p>

<p>A Climate Change strategy is being prepared by the Council and its partners to address these issues in more detail.</p>	<p><u>Nature-based Development</u></p> <p>Promote biodiversity and the natural heritage and greenspace across the city. Protecting and developing existing and new biodiversity and habitats for current and future generations.</p> <p>Ensuring that we protect wildlife, communicate awareness and engage communities and developers on the conservation of natural habitats.</p> <p><u>Equitable and People-centered Development</u></p> <p>Address inequalities exacerbated by the effects of climate change such as unemployment, fuel and food poverty, air quality and access to open space with associated impacts on health and wellbeing.</p> <p><u>Resilient Development</u></p> <p>Address the impacts and consequences of Climate Change by ensuring we have the right infrastructure in place to cope with the effects of extreme weather events such as flooding and extreme heat.</p> <p><u>Circular Economic Development</u></p> <p>Actively support businesses, schools, and partners in the minimisation of waste and the development of a circular economy which moves away from the traditional business model of consumption production and disposal to extending the life of products, re-use, and recycling.</p>	<p>Green Belt policies GB1-2 and Local Green Space Policy LGS1</p> <p>Green and Blue Infrastructure Policies GE1-4</p> <p>Design policies DE1 – 2</p> <p>Transport Policies AC1, AC4, AC5, AC6, AC7</p> <p>Environmental Management Policies EM1 and EM4 – EM15</p> <p>Infrastructure Policy IM1</p>
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2.4 It is essential that the Local Plan is prepared in a way which delivers sustainable development and supports the Council's journey to net zero. The National Planning Policy Framework (NPPF), within Local Plans must be prepared, sets out that there are three overarching objectives:

- an economic objective – 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;
- a social objective – 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; and
- by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – 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.

2.5 The plan review takes into account the above context, alongside the need to consider changes to national planning policy and guidance and other relevant policy and guidance. These are detailed in the separate chapters of the plan which address different themes.

### 3. Overall Levels of Growth and the Duty to Co-operate

#### Key evidence:

Housing and Economic Development Needs Assessment (2022)

Review of Coventry's Local Housing Need (2024)

Employment Land Review and Office Market Addendum (2024)

West Midlands Strategic Employment Sites Study (2024) and Coventry and Warwickshire Alignment Paper (2024)

Growth and Duty to Co-operate Background papers (2024)

#### Overall profile: summary

- 3.1 Coventry City Council's website provides a detailed [profile](#) about the city (which also includes mapped data) and this is a summary of the key issues. The city has a relatively young, and growing, population which is increasingly ethnically diverse. Deprivation is an issue in some neighbourhoods and whilst the situation is improving there are particular issues and challenges relating to social inequalities. More children in Coventry live in low income families than the national average.
- 3.2 Economically, the city has particular strengths in advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional and financial services; and digital, creative, and gaming. However, despite resilience in terms of spending and other economic activity, Brexit, the Covid-19 Pandemic and the recent cost of living crisis, have all had significant impacts on households and businesses.
- 3.3 In terms of housing and the environment, the 2021 Coventry Household survey showed a general satisfaction of the area as a place to live. As a result of the compact nature of the city, most people live within walking distance of a range of services and facilities including open and green spaces. However there are significant areas of deprivation where access to services, facilities and open space are poor, pollution levels are higher and this reflects in higher levels of dissatisfaction. In addition, housing stock is typically small and old, with just under two thirds having being built before the early 1950s. Many homes are damp and poorly insulated, and expensive to heat. Poor overall health and wellbeing is a particular challenge in the deprived areas of Coventry where life expectancy is shorter and of poorer quality.

## **Growth needs**

- 3.4 The Local Plan needs to ensure that housing and employment growth is managed in a sustainable way to ensure that it is also addressing environmental and social priorities including the delivery of infrastructure.
- 3.5 Planning for housing and economic needs is informed by the Housing and Economic Development Needs Assessment (HEDNA). This key piece of evidence has been produced jointly by Coventry and the Warwickshire Local Authorities of Nuneaton and Bedworth, North Warwickshire, Stratford on Avon, Warwick and Rugby because geographically they share a common Housing Market Area (HMA) and a Functional Economic Market Area (FEMA) i.e. their housing and economic circumstances are closely related.

## **Housing Need**

- 3.6 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, including those relating to particular demographic characteristics.
- 3.7 In Coventry's case, the Coventry and Warwickshire HEDNA found that there had been notable issues with the Office for National Statistics (ONS) population estimates for Coventry with the 2021 Census indicating that population had been significantly over-estimated. It was concluded that exceptional circumstances existed to deviate from the Standard Method for assessing local housing need because the basis upon which the Standard Method was based utilised erroneous data (the 2014-based Household Projections).
- 3.8 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). This concluded that the HEDNA remained a reliable basis for plan-making.
- 3.9 The Local Housing Need for Coventry for the period 2021-2041 is therefore 29,100 (1,455 per annum) and this will be delivered fully within Coventry's administrative area through an urban and brownfield-focused strategy of allocations and densification as set out in the Housing chapter of this reviewed plan.

## **Employment Land Needs**

- 3.10 In terms of employment, the HEDNA provides the starting point for the overall amount of employment which is needed over the plan period and this covers the Coventry and Warwickshire area.

- 3.11 However alongside this, work has been undertaken across the wider West Midlands region to understand the needs of large scale warehousing and logistics industries, the 'big box' units which are an increasing part of the economy both locally and nationally and which need sites of 25 hectares and above to function effectively (subject also to locational requirements). The West Midlands Strategic Employment Sites Study (WMSESS) 2024 has therefore been jointly produced by several Local Authorities across this area to guide this work.
- 3.12 Because the HEDNA was produced before the WMSESS, the Coventry and Warwickshire authorities jointly commissioned an 'Alignment Paper' (September 2024) to ensure all evidence was consistent, and up to date in terms of need, supply and any residual need (ie any remaining need which each of the Coventry and Warwickshire authorities would need to plan for).
- 3.13 Further detailed evidence has been prepared in terms of the Employment Land Review (ELR) and Office Market Addendum in terms of how employment need should be planned for, and this includes allocations and the identification of key sites as set out in the Employment chapter. Office needs have been assessed to understand further detail about the quantum needed and changing demand for space and flexibility, given altered patterns of working especially post-pandemic where hybrid working and use of technology is now commonplace.
- 3.14 In terms of office need, Coventry City Council is able to accommodate this, primarily but not exclusively within a revised Friargate allocation. In regard to local employment need (use classes E(g) (iii), B2 and B8), the City Council is able to accommodate 60 hectares of employment need, with a remaining shortfall of 45 ha which it is not able to accommodate within its own boundaries.
- 3.15 The above is for local need. In terms of a contribution to the wider strategic need, one allocation meets this, Baginton Fields, which is 25 hectares in size. Ongoing work is continuing with partners under the Duty to Co-operate to work collaboratively and constructively to address strategic need as, being a constrained area, no further opportunities are available in Coventry.

## **STRATEGIC POLICY**

### **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:-
  - a. A minimum of 29,100 additional homes.

- b.** A minimum of 60 ha of employment land to meet local needs within the city's administrative boundary, including:
    - i.** the continued expansion of Whitley Business Park; and
    - ii.** 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension (SUE).
  - c.** 25 ha, to be provided at Baginton Fields, to contribute to sub regional need in Coventry and Warwickshire
- 2.** A minimum of 41,200 sqm overall office provision to include 39,549 sqm of office floor space at Friargate in compliance with Friargate Allocation JE2:1 with the remainder delivered in compliance with the criteria set out in Policy JE4
- 3.** Notwithstanding the above, Coventry's employment need for the period 2021 to 2041 is for 105 ha of employment land (including qualitative replacements). 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 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.

## The Duty to Co-operate

- 3.16 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. It was created by the Localism Act 2011. Further details are set out in the Duty to Co-operate Paper

### STRATEGIC POLICY

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

1. 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.
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 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-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.
7. 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.

## **Delivering Sustainable Development**

- 3.17 The Government expects the planning system to actively encourage growth, giving local people the opportunity to shape communities, whilst providing sufficient housing to meet local need and support economic activity. This approach is entirely consistent with the Council's vision and aspirations for Coventry. In this context, it is important that the planning system does everything possible to support economic growth and sustainable development.
- 3.18 The NPPF sets out the presumption in favour of sustainable development and the need for sustainable economic growth. Local Plans should reflect this presumption within their own policy base to promote sustainable development at the local level.

## **STRATEGIC POLICY**

### **Policy DS3: Sustainable Development Policy**

1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development 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:
  - a. access to a variety of high quality green and blue infrastructure;
  - b. access to job opportunities;
  - 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.
2. Planning applications that accord with the policies in the Coventry Local Plan (and, where relevant, with policies in supporting plans) will be approved without delay, unless material considerations indicate otherwise.
3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.
4. This will take into account:
  - a. Any adverse impacts of granting permission that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
  - b. Specific policies in that Framework that indicate that development should be restricted

## Masterplan Principles

- 3.19 To support the delivery of sustainable development the importance of embedding a strong master planning framework within the Local Plan cannot be underestimated.
- 3.20 This policy, together with other relevant policies provides the master planning principles to guide and support landowners and developers in preparing appropriate master plans and site plans to help inform the Development Management process. It will provide an over-arching framework for the master planning of new development proposals.
- 3.21 Part A of this Policy provides a general context. Parts B-D relate specifically to the 3 specific allocations (Whitley, Keresley and Eastern Green) which the Council considers of significant strategic importance to the successful implementation of this Plan and its objectives. The Council considers these sites to be of sufficient scale to warrant comprehensive consideration through a master planning process.
- 3.22 To support this, planning conditions and Planning Obligations will be used in accordance with Policy IM1 to deliver necessary supporting infrastructure with trigger mechanisms and thresholds used to ensure timely provision. This will have regard to the requirements of this Local Plan as well as supporting evidence and modelling work provided as part of the planning application.
- 3.23 The infrastructure provisions contained within parts B-D of Policy DS4 and the supporting policies reflect the known requirements at this time. Future updates to the Infrastructure Delivery Plan (IDP) will allow such information to be

regularly updated to reflect prevailing circumstances and show more detail when it is known.

## **STRATEGIC POLICY**

### **Policy DS4 (Part A) – General Masterplan principles**

The following General Principles should be adhered to when master planning any major development proposal:

- i. Where appropriate the Masterplan should clearly identify any phasing of development along with the timely provision of supporting infrastructure;
- ii. Where the site is identified as an allocation within the Local Plan it should plan positively to meet in full the requirements identified within the relevant policies associated with the allocation. Where the proposal represents a phase or phases of a wider scheme however, the quantum of development should reflect the relative size and characteristics of the phase, including its position within the wider site;
- iii. Where possible, all proposals should be planned in a comprehensive and integrated manner reflecting partnership working with relevant stakeholders. Where proposals represent a phase of a larger development the Masterplan should have full regard to any adjoining land parcels and development proposals to ensure it delivers appropriate parts of the strategic or site-wide infrastructure and other relevant features. This should support the wider delivery of the comprehensive scheme;
- iv. Opportunities to deliver higher density residential and mixed-use development should be maximised along public transport corridors and in designated centres with lower densities provided elsewhere (in accordance with policies H9 and R3);
- v. Employment and commercial proposals should respond positively to market demands and requirements, maximising opportunities to locate within or close to designated centres (as appropriate) and provide a range and choice of opportunities to meet business and customer needs;
- vi. Identify appropriate highway infrastructure along with sustainable transport corridors that include the provision for integrated public transport, cycling and walking which provides excellent connectivity and linkages to within the site itself, the city centre and with the surrounding area and existing networks;
- vii. Appropriate levels of car and cycle parking should be made in accordance with the Local Plan's parking requirements. Spaces should be well integrated

within the development and laid out to ensure they do not result in the obstruction of the highway as a result of excessive on-street parking;

- viii.** Where appropriate social and community facilities should be concentrated within mixed use hubs and designated centres and easily accessed by public transport, walking and cycling (having regard to Policy CO1);
- ix.** Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1), to create new well designed developments with a distinctive character which residents will be proud of;
- x.** Features of the historic environment should be respected as part of new developments with existing heritage assets conserved and enhanced as part of development proposals (in accordance with Policy HE2). Where appropriate, this should include the setting of buildings and spaces and the restoration of assets at risk of loss;
- xi.** Sympathetically integrate existing landscape, biodiversity and historic features of the site into the development taking opportunities to protect, enhance and manage important features along with mitigation and enhancement measures to provide satisfactory compensatory provisions where appropriate (having regard to Policies GE1-4);
- xii.** Provide fully integrated, accessible and connected multi-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;
- xiii.** Where appropriate incorporate innovative and creative approaches to energy generation, the provision of utilities and information technology, mitigation of pollutants, management of surface water and flood risk and waste management solutions. These should be adopted to make new developments more sustainable and resistant to the impacts of climate change; and
- xiv.** All new Masterplans should be informed by consultation with existing communities in adjoining areas. This should take place prior to the submission of a planning application to ensure feedback can influence the final proposals.

3.24 As outlined above, Parts B-D of this policy relate to the following sites:

- The Whitley employment hub (including the future expansion of JLR);
- The Keresley SUE; and
- The Eastern Green SUE

These are considered to offer significant strategic importance to the successful delivery of the Local Plan and due to their size and nature will require a degree of comprehensive master planning.

## **Policy DS4 (Part B) - Whitley Specific Masterplan Principles**

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

- i.** Any development should support and complement the existing JLR global headquarters;
- ii.** New provision should be primarily focused within 'B class' uses unless they are shown to be ancillary and supportive to the overall provisions of the business park and in accordance with the other policies of this Plan;
- iii.** Support and integrate the planned highway infrastructure (as listed in the IDP) across the A45, A444 and other appropriate surrounding roads to ensure efficient and appropriate vehicle access into the site(s);
- iv.** Continue to maximise links and connectivity with surrounding business parks within both Coventry City and Warwick District to enhance the employment hub;
- v.** Expand and enhance on existing travel plans and continue to encourage excellent connectivity to public transport as well as the provision of high quality routes to support both walking and cycling;
- 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;
- vii.** An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road;
- viii.** Development should not compromise the presence and ecological value of the River Sowe and River Sherbourne; and
- ix.** Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2;

3.25 Further to Part B of Policy DS4, further considerations may be of relevance to the wider Whitley Business Park in so far as it relates to land within Warwick District. Notwithstanding the extensive cooperation between Coventry City Council and Warwick District Council in relation to this area, it is not within the remit of this Local Plan to apply policy proposals to land outside of Coventry's administrative boundary

## **Policy DS4 (Part D) – Eastern Green SUE Specific Masterplan Principles**

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

- i.** Incorporate the recommendations of the Council's SUE Design Guidance SPD;
- ii.** Respond to the transport and economic opportunities associated with the site's proximity to the planned HS2 interchange to the west.
- iii.** Ensure that the employment provisions and Major District Centre are located towards the north of the site and are accessed directly from the new A45 Junction. Neither the employment provision or new Major District Centre should be occupied until the new A45 junction is fully operational;
- iv.** Furthermore, the residential element of the scheme should be limited to the occupation of no more than 250 homes until such time as the new A45 junction is fully operational, unless otherwise agreed in writing by the Council in response to a robust TA.
- v.** Ensure the new defensible boundaries to the Green Belt are clearly supported to Pickford Green Lane in the west and the A45 to the north;
- vi.** Provide appropriate green infrastructure along the western edge of the SUE around Pickford Green 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. This should run from Pickford Green Lane in the west and link to existing corridors off-site, for example, across Westridge Avenue and Parkhill Drive towards Allesley Park;
- viii.** Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site;
- ix.** In accordance with Policy AC2, manage the existing highway junctions at Pickford Green Lane and Brick Hill Lane with the A45 to ensure they are either integrated into the new A45 Junction or safely retained within the existing highway network; and
- x.** Make appropriate provision to aid future integration of the new rapid transit route within the site once the final route is known.

## 4. Health and Wellbeing

### Key Evidence

Coventry Joint Strategic Needs Assessment 2019

Coventry Health and Wellbeing Strategy 2023 -26

Indices of Multiple Deprivation

Health Background Paper 2024

### Context

- 4.1 This chapter sets out the policy and guidance to support the health and wellbeing of Coventry's population over the plan period. It builds upon the NPPF's principle of achieving sustainable development and ensuring the health status and needs of the population are fully understood and taken into account as part of the development process. A key role of the Local Plan is to provide for development in a way that supports healthy and active lifestyles.
- 4.2 A healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing.
- 4.3 Poor health and wellbeing cannot be explained as arising by chance or genetics alone, increasingly the impact that the built environment has on health and health inequalities is being recognised. The places that people live in can have a direct and significant impact on peoples' health and wellbeing as the way that places are designed and constructed can have substantial effects on people's lifestyles.
- 4.4 Health and wellbeing are not consistent throughout the population, with health inequalities present across the population of Coventry. These inequalities can often be observed across small areas, with the differences in health and wellbeing throughout the population strongly correlated with levels of socio-economic deprivation. Economic, social and environmental conditions all influence health and wellbeing outcomes. Typically, those living in the most deprived areas experience worse health inequalities compared to those living in less deprived areas.
- 4.5 These were the findings of a review by Sir Michael Marmot (The Marmot Review, 2010) and as a result Coventry City Council was one of seven cities in the UK invited to participate in the UK Marmot Network, and it became a Marmot City in 2013. Addressing health inequality and health equity is therefore a key priority of the Council.

- 4.6 Using the [Marmot Monitoring Tool](#), the Council actively seeks to address and improve the health and wellbeing of its population. It is therefore vital that health matters are an integral part of any development process.
- 4.7 Health Impact Assessments (HIAs) are useful tools in determining planning applications where there are expected to be significant impacts on health and wellbeing. They should be used to reduce adverse impacts and maximise positive impacts on health and wellbeing of the population as well as assessing the indirect implications for the wider community. HIAs are usually forward looking and can be carried out at any stage of the development process but are best undertaken as early as possible in the design process to ensure health matters are integrated at the outset.
- 4.8 Even for smaller applications health matters should be a consideration, and should be incorporated into the Design and Access Statement.
- 4.9 An updated Health SPD will be produced which provides guidance on producing Health Impact Assessments for major applications and a checklist to assist in factoring in health considerations for smaller applications, ensuring that matters addressed are proportionate to the nature and scale of the proposal.
- 4.10 Major development proposals in particular are more likely to have a significant impact in terms of health and wellbeing, which is recognised by national guidance. As such a HIA will be required to support developments defined as follows:
- a. the use of land for mineral-working deposits;
  - b. waste development;
  - c. all forms of residential development where:
    - i. the number of homes to be provided is 150 or more; or
    - ii. the site area is 5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i)
  - d. all forms of urban development (not involving housing) where:
    - i. the area of development exceeds 1ha; or
    - ii. in the case of industrial development exceeds 5ha

## **STRATEGIC POLICY**

### **Policy HW1: Health and Health Impact Assessments (HIA)**

- 1.** All major development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a:
  - a.** HIA where significant impacts on health and wellbeing would arise from that proposal; or
  - b.** HIA Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing.
- 2.** All HIAs shall be undertaken in accordance with the Council's HIA Supplementary Planning Document or any future equivalent.
- 3.** Where a development has significant negative or positive impacts on health and wellbeing the Council may require applicants to provide for the mitigation or provision of such impacts through planning conditions and/or financial/other developer contributions
- 4.** Where the threshold has not been met for requiring a full HIA, for major applications of 10 dwellings or more, applicants will be required to demonstrate through their Design and Access Statements how they have taken health matters into account in line with principles contained in an updated Health SPD.

## 5. Jobs and Economy

### Key evidence

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)

### Economic Opportunities and Challenges

- 5.1 Coventry City Council's administrative area sits within the wider economic sub region of Coventry and Warwickshire which forms the defined Functional Economic Market Area (FEMA).
- 5.2 The Council's [Economic Development Strategy](#) sets out the local context. In the 10 years after the 2008/09 recession, Coventry & Warwickshire was the fastest-growing local economy in England, driven significantly by major investments in Research & Development and production in the automotive sector and its supply chain, as well as continued expansion of the professional services sector and creative economy.
- 5.3 However, the local economy has encountered significant challenges in recent years. Growth slowed in 2018/19, and the COVID-19 pandemic had a severe impact on the local labour force. Longstanding inequalities across Coventry were exacerbated as a result.
- 5.4 Further challenges emerged in 2021 and 2022, with inflation (driven heavily by energy and component cost increases), labour shortages, and new regulations and document requirements for UK-EU trade post-Brexit all of which have slowed economic recovery. It is therefore crucial that Coventry can deliver a strong and sustainable recovery from this challenging economic climate, and that foundations are put in place for longer-term prosperity.
- 5.5 The Local Plan aims to help to deliver the key priorities of the Council's Economic Development Strategy which are:
  - Focus on Advanced Manufacturing & Engineering: Emphasis on B2 floorspace and modern facilities to accommodate these sectors' requirements. Demand for skilled labour force within this sector.

- Promoting a Green City: Prioritising industrial innovation for sustainability through investment in sustainable transport to foster environmental consciousness.
- Cultural City with Expanded Creative & Tourism Sectors: Creative industries likely to require E(g) floorspace.
- Commitment to expanding creative and tourism sectors for cultural growth.
- High Employment Levels & Quality Jobs: Strong focus on creating employment opportunities with quality jobs.
- Opportunities for All through Education & Skills Ecosystems: Strengthening universities and education institutions to create opportunities for everyone.
- Addressing Inequalities: Aim to reduce health, economic, and social inequalities across the city.

5.6 The Coventry and Warwickshire HEDNA (2022) shows a strengthening local economy for Coventry with the key sectors being Education (13.1%), Health and Care (12.1%), Manufacturing (10.6%), Business Support Services (9.7%), Professional Services (7.6%) and Retail (7%). Coventry contains 39% of the study area's office stock, totalling 477,000 square metres, reflecting its position as a key commercial centre in the FEMA. Between 2011 and 2019 there was an increase of 26,700 jobs in Coventry.

5.7 However, as set out in the Employment Land Review (2024), exploration into Coventry's commercial markets reveals variances in vacancy rates and rental prices and data indicates a complex and changing landscape within the commercial market.

5.8 Furthermore, the HEDNA considered, at a high level, the impacts of the changed patterns of working especially relating to increases in hybrid and flexible working since the pandemic on office floorspace requirements. This was explored further through the ELR Office Market addendum, concluding that floorspace requirements in this sector could be reduced to respond to changes in the way the sector is now operating.

5.9 There are also particular challenges within the storage and distribution / logistics sectors as their demands and locational requirements have altered over time, including access to the strategic road and rail network and access to local markets and labour. This issue relates to 'Strategic B8', the 'big box' units of over 9,300 sq.m in size and strategic sites of 25 hectares and above. Because of the strategic nature of the challenges involved evidence (the WMSESS) was produced jointly by a number of authorities across the West Midlands area, and a more local 'alignment paper' was produced by the Coventry and Warwickshire local authorities to explain how this aligned with the HEDNA assessment of strategic B8 needs, which had been produced at an earlier date.

- 5.10 It is important that the location and provision of employment land is considered against future growth sectors and is able to adapt to changing needs of the various economic sectors over the plan period not just within Coventry but within the wider FEMA. This includes continuing to support the key sectors mentioned in paragraph 5.6 as well as supporting new and emerging sectors such as the growth in green industry, and working with our partners to ensure more strategic needs are met.

## Definition of Employment

- 5.11 Defining 'employment' for the purposes of plan making and decision-taking is complex. The [Use Classes Order](#) was updated in 2020, therefore it is important to clarify that for the application of Local Plan Policy (and associated monitoring) this will relate to Class B2, B8 and E (g).
- 5.12 However, for the purposes of decision-making when considering planning applications it is recognised that outside of these use classes there are many other sectors which generate jobs, and therefore other uses serving an employment purpose will be taken into account in the planning balance.

## STRATEGIC POLICY

### Policy JE1: Overall Economy and Employment Strategy

1. In accordance with the One Coventry Plan, the Economic Development Strategy and the Climate Change Strategy 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. In this regard the Council will:
  - a. Promote continued diversification of the city's economic base, particularly through supporting the expansion of companies operating in growth sectors particularly those relating to sustainable and green technologies, and through fostering partnership working with the city's Universities to promote innovation;
  - b. Ensure that job opportunities arising from employment development are accessible to all of the city's working age residents, particularly priority groups and those in the most deprived areas of the city;
  - c. Provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period related to growth of the city's population and the pivotal role of the city in the ambitious growth agenda for the sub-region;

- d. There will be a presumption against the loss of employment uses, and change to non-employment uses will be assessed against the criteria set out in Policy JE3
- e. Support companies, including Jaguar Land Rover, in retaining, expanding and/or relocating their headquarters operations within the city and support the provision of new infrastructure that encourages these companies to grow.
- f. Seek to direct office development to locations in the city centre and other defined centres with new large scale office development focused on the city centre
- g. 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 impact on the highway network and to minimise the potential for environmental conflict with nearby sensitive land uses;
- h. Support tourism/visitor related development including Coventry city centre, the CBS Arena and the Coventry and Warwick University Campuses.
- i. Support the continued growth of the city's two universities and in doing so maximise the economic development and other community benefits associated with them.
- j. Support the provision of new green infrastructure as part of new and improved developments

## Provision of Employment Land and Premises

- 5.13 Employment land should be provided to meet the needs of all employment uses – offices, research and development, light/general industrial and storage/distribution. These uses have varying land requirements. Office occupiers tend to seek city centre locations, research and development occupiers often require sites with close links to the universities whilst industrial and storage/distribution occupiers prefer sites which have good access to the strategic highway network and are not constrained by their proximity to neighbouring sensitive land uses such as housing. Sites of varying size are also required to meet the needs of both large and small businesses.
- 5.14 The HEDNA (2022) along with the subsequent Alignment Paper (2024) sets out that for Coventry between 2021 and 2041 105 hectares of employment land (use Classes B2 and B8) is required. This does not include the strategic 'big box' need which is set out in the alignment paper as between 136 – 311 ha across the Coventry and Warwickshire sub region.

- 5.15 In addition the ELR Office Market Addendum (2024) establishes an indicative minimum need of 41,200 sq.m. office floorspace provision with a recommendation for flexibility to allow for the ability to respond to changing markets.
- 5.16 Table 5.1 below provides a summary of the employment land supply components for Class B2 and B8

**Table 5.1 – Class B2 and B8 local employment land supply components for Coventry**

Supply components	Site size (Ha)
Completions 2021 – 2024*	25.4
Committed supply	6.2
Remaining Allocations from adopted 2017 Local Plan carried forward (where not included above)**	28.6
<b>Total</b>	<b>60.2</b>

\*Data up to 31 March 2024

\*\*Includes 1.2ha at Austin Drive HELAA site. Excludes 25ha at Baginton Fields which is for strategic B8

- 5.17 Table 5.2 below provides a summary of the employment land supply components for office uses

**Table 5.2 – office supply components for Coventry**

Supply components	Site size (sqm)
Completions 2021 - 2024	22,299
Committed supply	24,940
Remaining Allocations from adopted 2017 Local Plan carried forward (where not included above)*	27,100
<b>Total</b>	<b>74,339</b>

\* Friargate remaining as part of reconfigured mixed use calculations (see Friargate allocation)

- 5.18 In terms of office allocations Coventry is able to meet its own need, through a majority of provision through a reviewed Friargate allocation. Since 2021, Friargate has delivered 12,449 sq.m floor space at Friargate 2 (Friargate One was delivered prior to the start of the plan review period), and a further 27,100 sq m will be provided as part of the Friargate allocation. This totals 39,549 sq.m delivery at Friargate over the plan period, leaving a residual amount of around 1,650 sqm to be delivered in line with the approach set out in Policy JE4
- 5.19 In terms of remaining local employment needs excluding office provision 60 hectares for local need can be accommodated taking into account supply,

completions and allocations, leaving a residual need of 45 hectares. The city is unable to meet its need in full which has already been highlighted through Policy DS1 and reflects the importance of the Duty to Co-operate in ensuring the employment land needs of the sub region are met.

- 5.20 In terms of strategic employment the Baginton Fields (Policy JE2:4) allocation meets the 25 hectares and above criterion and is to be retained as an allocation to contribute to the wider strategic needs of the sub-region, and again the Council will work with partners to ensure strategic needs are met.
- 5.21 The Employment Land Review assessed Coventry's employment sites and concluded that a number of these were particularly important in maintaining a resilient and varied employment stock: these are designated as Key Employment Sites.

## **STRATEGIC POLICY**

### **Policy JE2: Provision of Employment Land and Premises**

1. A total of 52 ha of land is allocated for employment development within the city's administrative area, plus 27,100 sq m remaining floorspace at Friargate as part of a wider mixed use allocation. The allocations are as specified below together with details of the type of employment development that will be promoted on each of these sites.

Site ref	Site	Ward	Site area (as allocated (ha) in 2017 adopted plan)	Allocation (local Plan review) – area remaining (ha unless specified otherwise)	Comments
JE2:1	Friargate (part of mixed use scheme)	St Michaels	7	27,100 sq m office floorspace (part of mixed use development)	6.52ha remaining overall site area. Friargate 1 and 2 delivered.
JE2:2	Lyons Park	Bablake	19	0	Delivered
JE2:3	Whitley Business Park	Cheylesmore	30	6.46	Part delivered
JE2:4	Land at Baginton Fields and South East of Whitley Business Park	Cheylesmore	25	25	Application awaited
JE2:5	A45 Eastern Green (part of mixed use site)	Bablake	15	15	Outline application received
JE2:6	Whitmore Park (part of mixed use site)	Holbrook	8	2.89	Part delivered
JE2:7	Durbar Avenue (part of mixed use site)	Foleshill	1.5	1.5	Application awaited
JE2:8	Land at Aldermans Green Road and Sutton Stop (part of mixed use site)	Longford	1.5	1.5	Application awaited
	<b>Total</b>		<b>107ha</b>	<b>52.35 (excludes Friargate office floorspace figure)</b>	

2. The Friargate, A45 Eastern Green, Whitmore Park, Durbar Avenue and Alderman's Green Road and Sutton Stop employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.
3. A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring

Report (AMR) and informed by the Employment Land Review which will be updated on a five yearly basis.

4. The following sites, shown at Appendix 9a and listed in bullet point 5, are designated as Key Employment Sites which will be protected for employment use. Alternative uses will not be considered acceptable unless exceptional circumstances demonstrate otherwise. In such cases it must be demonstrated that delivery of mixed use including retention of employment has been considered on the site. Only where this has been evidenced not to be viable or appropriate will policy JE3 and associated Appendix 2 be applicable.
5. Key Employment Sites are shown at Appendix 9a and are:
  - Binley Business Park
  - Coventry Business Park
  - Cyan Park
  - Lyons Park
  - Swallowgate Business Park
  - University of Warwick Science Park
  - Whitley Business Park

## **Non-Employment Uses on Employment Land**

- 5.22 It is essential that a sufficient amount and range of employment land is maintained throughout the city to ensure that the city's economy continues to grow and residents have access to job opportunities. This objective is achieved in part through the allocation of land in this Plan for employment purposes along with the designation of Key Employment Sites. This policy seeks to protect these allocated and designated sites from undesirable redevelopment or conversion for non-employment uses. It is also important to ensure that existing non-allocated employment sites are also retained for employment use wherever possible.
- 5.23 On those employment sites where this Policy applies the loss of such sites to non-employment use will not be permitted unless the exceptions criteria outlined in the Policy are satisfied.
- 5.24 Where it is considered that a site is no longer suitable for employment use the evidence of unsuccessful active and substantial marketing of the site using a variety of media will normally need to show that such marketing has taken place for a continuous period of at least 6 months, immediately prior to the submission of any planning application for non-employment use of the site. This marketing activity should be undertaken in accordance with Appendix 2 of the Local Plan.

### **Policy JE3: Non-Employment Uses on Employment Land**

1. Sites designated as Key Employment Sites will firstly be assessed in accordance with Policy JE2
2. Proposals for the redevelopment in whole or in part of employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where non employment development is proposed are:
  - a. No longer suitable for employment use bearing in mind their physical characteristics,
  - b. access arrangements and/or relationship to neighbouring land-uses and there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this; or
  - c. It would not be financially viable to re-use or re-develop the land or buildings on the land in whole or in part for employment purposes; or
  - d. The non-employment development proposed would be used for purposes which are clearly ancillary to and will support the operations of a primary employment use on the land; or
  - e. The non-employment development would generate significant employment gains which are of sufficient weight to justify the loss of employment land.
4. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:
  - a. The potential of the site to contribute to the employment land requirements of the city over the plan period is not significant; and
  - b. The proposal would not significantly compromise the viability or deliverability of other adjacent employment land or land allocated in this Plan for employment development; and
  - c. The proposal will not have an unacceptable adverse impact on the continuing operation of any nearby existing businesses.
5. Planning applications to which this Policy applies should be accompanied by written evidence to demonstrate that the proposed development satisfies the exceptions criteria highlighted above.
6. This Policy applies to land which is currently in use or was last used for employment purposes unless such land has been allocated in this Plan wholly for non-employment use.

### **Location and type of new office development**

- 5.25 The NPPF defines office development as a main town centre use. Therefore the 'Sequential Test' applies and such development should normally be

accommodated within defined centres unless it can be demonstrated that there are no sites within such centres which are suitable and available to accommodate the proposed development. The NPPF and associated Planning Practice Guidance sets out how the sequential test should be applied.

- 5.26 The ELR Office Market Addendum recommends a continued focus of office development within the city centre. This includes the Friargate site but with some further flexibility to enable windfall office floorspace development to come forward in other sustainable locations outside the Friargate allocation site in line with the sequential approach set out in the NPPF. This is to encourage and support the provision of office stock, both new and refurbished, to respond to changing market needs in this sector. Similarly, office developments are encouraged to ensure their layouts are flexibly designed (eg to allow for reconfigured internal layouts) so that they can adapt to a range of potential users such as start ups, grow-on or small to medium enterprises.

#### **Policy JE4: Location and type of Office Development**

1. New office development (including change of use of buildings to provide office accommodation and the expansion of existing office uses) should normally be sited within Coventry city centre or other defined centres (as defined on the Policies Map).
2. The Friargate site within Coventry city centre is the Council's preferred location for new large scale office development.
3. Proposals for new office development in other locations will only be permitted if the following criteria are satisfied:
  - a. Having regard to locational factors, there are no suitable sequentially preferable sites available within the city centre, another defined centre or in an edge-of-centre location (if no Defined Centre sites are suitable and available); or
  - b. The proposal is for small scale rural offices;
4. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:
  - a. The proposal would not have a significant adverse impact on the vitality and viability of defined centres and on existing, committed and planned public and private investment in office development within a defined centre; and
  - b. The site is accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development; and
  - c. There is good access from the development to a primary route on the highway network and acceptable impact on the capacity of that network; and

d. The proposals are compatible with other Plan Policies.

5. Proposals for new office development outside of Defined Centres shall be accompanied by a Sequential Assessment.

6. New build offices, and conversions of premises to offices should be designed to allow for flexibility of internal layouts so that these can be altered to adapt to changing market conditions and the needs of users.

## **Location of Industrial and Storage / Distribution Development**

5.27 The Council's preferred location for new industrial and storage/ distribution development are the various sites allocated for such purposes under Policy JE2.

5.28 Notwithstanding this, it is acknowledged that proposals may come forward on other non-allocated sites within the city for these uses. All industrial and storage/distribution developments on such sites should be accessible by a choice of means of transport, have an acceptable impact on the highway network and be compliant with other Plan Policies.

5.29 However, in addition it is acknowledged that significant environmental impacts can arise from general industrial and storage/distribution operations and therefore 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 or other land occupied by uses sensitive to environmental pollution such as schools and hospitals.

5.30 The Council will also need to be satisfied that proposals on windfall sites would not compromise the viability or deliverability of land allocated in this Plan for employment development.

5.31 Given the nature and scale of the storage and distribution sector and its dependence upon road freight movements, in order to reduce impact on the road network and in line with the [transport strategy](#), B8 uses will need to include HGV parking and overnight facilities. In addition, electric vehicle charging and consolidation facilities will need to be delivered. Freight consolidation is where many suppliers have goods delivered directly to a place (consolidation centre or delivery hub), where it is stored and then delivered to its final destination by means which have a reduced impact upon the local road network such as smaller more sustainable vehicles, or alternative delivery technologies, for example.

5.32 Overall the objective of Policy JE5 is to ensure that businesses can locate in the optimal location in terms of accessibility and minimising environmental conflicts whilst also providing residents with good access to a range of job

opportunities across the city and minimising impacts upon the environment, health and climate change.

### **Policy JE5: Industrial and Storage / Distribution Development**

1. The Council's preferred location for new industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2.
2. Proposals for new industrial and storage/distribution development (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:
  - a. Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;
  - b. Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;
  - c. Would not significantly compromise the viability or deliverability of I and allocated in this Plan for employment development;
  - d. Would be compatible with other Plan Policies.
3. In addition to the above, proposals for new general industrial and storage/distribution development (including changes of use and the expansion of existing operations) on all sites (including those allocated under Policy JE2) will also be required to demonstrate that the proposed development would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution.
4. In addition to the above, where B8 uses will include HGV parking and overnight facilities, electric vehicle charging and consolidation facilities.

### **Tourism / Visitor related development**

- 5.33 According to [Destination Coventry](#) (2024) the tourism, leisure and hospitality sector, generates<sup>1</sup> over £750 million, supports circa 7,357 jobs, and attracts over 11 million visitors annually. The Council's [Economic Development Strategy](#) highlights the importance of tourism in delivering sustainable economic growth. This includes delivering physical enhancements to Coventry's culture and tourism assets to increase footfall, dwell times and spend and further build the city's reputation for hosting major national events and as a destination for leisure and tourism. The strategy states that central to achieving this objective will be the completion of the development of the Collections Centre as a focal point for arts and creative sectors, as well as realising the Arena Quarter

Masterplan which will be crucial to maximising the economic potential of the North East of the city.

- 5.34 Destination Coventry is a newly formed (2024) Destination Management Organisation and will take forward and develop the Coventry Tourism Strategy 2019-2023
- 5.35 Policy JE6 therefore seeks to support proposals for tourism/visitor related development in accordance with the Economic Development Strategy and the aims and objectives of Destination Coventry subject to compatibility with other Plan Policies. 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 down in national guidance.

**Policy JE6: Tourism/Visitor Related Development** Proposals which would contribute towards the city's role as a tourist destination will be supported subject to compatibility with other Local Plan Policies.

## Accessibility to Employment Opportunities

- 5.36 One of the key pillars of the Council's [Economic Development Strategy](#) is to support all Coventry residents to access jobs and develop skills. This will help support education and skills issues that restrict the labour market progression of both people in work and the unemployed (7.1% of Coventry's working-age population have no qualifications compared to 6.4% nationally). Any failure to match the local workforce's skills to employer's needs risks harming the economic recovery of key sectors. The Council has stated that it will continue to support local businesses to tackle challenges with recruitment and labour supply.
- 5.37 Moreover, those without work or who are low paid are vulnerable to poorer health and life expectancy, and the Council has committed to working with businesses to tackle longstanding health inequalities. The Council is therefore prioritising the upskilling and reskilling of the local workforce and ensuring local people access new jobs emerging. This strategy is fully integrated with the new [Coventry Skills Strategy](#) . Working with stakeholders the Council will encourage social responsibility in the development sector, and ensure the benefits of this are being realised well into the future within the city.
- 5.38 Furthermore the Economic Development Strategy seeks to encourage the development and growth of social enterprises across a range of sectors, and boost their capacity to tackle social and environmental needs and provide training and job opportunities.

## **Policy JE7: Accessibility to Employment Opportunities**

1. Planning applications for new employment development (including changes of use and the expansion of existing operations) will be required to demonstrate how job opportunities arising from the proposed development will be made accessible to the city's residents, particularly those in the most deprived areas of the city and priority groups. In this regard applicants will be expected to give consideration to a range of measures including:
  - a. enhancement of the accessibility of the development to residents by a choice of means of transport;
  - b. developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks;
  - c. the provision of support to residents in applying for jobs arising from the development;
  - d. the provision of training opportunities to assist residents in accessing employment opportunities;
  - e. childcare provision which enables residents to access employment opportunities; and/or
  - f. measures to assist those with physical or mental health disabilities to access employment opportunities.
2. In respect of planning applications for new employment development the Council may require applicants to make developer contributions to maximise the accessibility of job opportunities to the city's residents.

## **Location of Research and Development (R&D)**

- 5.39 The Council's preferred location for new Research & Development (R&D), development are the various sites allocated for such purposes under Policy JE2. Notwithstanding this, it is acknowledged that proposals may come forward on other non-allocated sites within the city for these uses. All R&D developments on such sites should be accessible by a choice of means of transport, have an acceptable impact on the highway network and be compliant with other Plan Policies.
- 5.40 The R&D sector is closely linked to the work of the local universities and its culture of innovation and enterprise, and it is important that this is supported in order to grow and evolve the economy. The Economic Development Strategy seeks to encourage 'creators, designers and makers' to work alongside homegrown talent to shape new industries and technologies, as well as attracting, retaining and growing new and better jobs that will drive the city's future.

- 5.41 Coventry's strong history of innovation and first-class support ecosystem means the city is well placed to lead the way in delivering a "Green Industrial Revolution", given that it produces the fourth highest number of patents per head of all major UK cities (75.6 per 100k population), and R&D will play a key role in delivering new green industrial technologies.

### **Policy JE8: Location of Research and Development (R&D)**

1. The Council's preferred location for new Research & Development (R&D), are the sites allocated under Policy JE2.
2. However, proposals for new R&D, (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:
  - a. Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;
  - b. Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;
  - c. The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development;
  - d. The development is compatible with other Plan Policies.

## 6. Delivering Coventry's Housing Needs

### Key evidence

Housing and Economic Development Needs Assessment (2022)

Review of Coventry's Local Housing Need (2024)

Housing and Economic Land Availability Assessment (2024)

Gypsy and Traveller Accommodation Assessment (2023)

Viability Assessment (2024)

Density Study (2024)

Purpose Built Student Accommodation Market Study (2024)

Authorities Monitoring Reports

Coventry City Council Housing and Homelessness Strategy 2019 - 2024

Coventry City Council Homefinder data

Housing Background Paper

### The Housing Market in Coventry

- 6.1 Since 2011, the [Authorities Monitoring Reports](#) show strong performance overall of housing delivery against the Local Plan requirement. The 2022/3 monitoring year showed cumulative delivery of 24.6% above the Local Plan requirement of 14,200 at this stage in the projection.
- 6.2 Monitoring shows an increasing number of family homes (3 bedrooms and larger) being completed as a result of the Strategic Urban Extensions (SUEs) starting to be delivered. However, recent monitoring has also shown a significant spike in the delivery of Purpose Built Student Accommodation (PBSA) and the conversion of a number of dwellings to Homes in Multiple Occupation (HMOs). In regard to HMOs these are now being regulated via an [Article 4 Direction](#) and a [Homes in Multiple Occupation Development Plan Document](#).
- 6.3 The HEDNA sets out details of market conditions across the Coventry and Warwickshire Housing Market Area (HMA). Overall house price growth has been stronger than the regional and national average since 2013, but the pattern is varied across the sub region, with Coventry, along with North Warwickshire, Nuneaton and Bedworth and Stratford on Avon displaying slightly weaker growth in recent years when compared to the West Midlands region. Rugby and Warwick show stronger growth during the same period.

- 6.4 In terms of house prices, however, Coventry, along with North Warwickshire and Nuneaton and Bedworth have lower than the national average values.
- 6.5 In regard to sales, across the HMA overall there is a balance between terraced, semi detached and detached stock, for Coventry 76% of sales in 2020 were either terraced or semi-detached homes. Sales of flats were highest in Warwick (18%) followed by Coventry (12%). When location and value were considered together, sales of properties under £200,000 were focused particularly in Coventry. This reflects the choice of stock available at that point in time and the situation can be expected to change now that the strategic urban extensions allocated through the 2017 plan are progressing.
- 6.6 The HEDNA also highlights the importance of the availability of mortgage products for first time buyers across the HMA: a combination of rising house prices and limited availability of mortgages with higher loan-to value ratios has been restricting first time buyer numbers.
- 6.7 In terms of the lettings market, the HEDNA shows Coventry to have higher median rents than the regional average (2021) but lower than the national average. However, in the HMA since 2018 relative growth in rents has been consistently stronger in Coventry (albeit median rates remaining below Stratford on Avon and Warwick). There is a clear need for rental properties with the HEDNA identifying that demand is outstripping supply, in Coventry this is particularly for 2 and 3 bedroom properties.
- 6.8 In terms of the Council's Housing and Homelessness Strategy, the Local Plan can help to deliver its key priorities: Preventing Homelessness and Supporting Homeless Households; Support for People and Communities; Improving the Use of Existing Homes; Housing Development. Addressing a variety of needs requires a varied housing stock and this chapter explores this in more detail.

## **Scale of Housing Development**

- 6.9 The joint Coventry and Warwickshire HEDNA (2022) and the Coventry update Paper 'Review of Coventry's Housing Need' (2024) confirms that exceptional circumstances exist to justify applying an alternative approach to the national Standard Method for determining housing need. This is in accordance with the NPPF (December 2023 paragraph 61).
- 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. Table 6.1 below identifies the Council's housing land supply and sets out how the requirement will be met.

Table 6.1 Components of housing supply 2021-2041

Housing Land Supply Components (data to 30/9/24)	Number of Homes
Past net completions	7,666
Committed supply	13,975
Remaining allocations (2017 Local Plan)	2,733
Proposed new site allocations (local plan review)	3,503
Other identified sites (HELAA)	816
Windfall allowance	2,800
<b>Total</b>	<b>31,493</b>

- 6.11 The trajectory contained in Appendix 3 shows how development will be delivered over the plan period.

## STRATEGIC POLICY

### Policy H1: Housing Land Requirements

1. Provisions will be made for a minimum of 29,100 additional dwellings between 2021 and 2041.
2. The housing requirement is to be delivered in line with the trajectory set out in Appendix 3
3. 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.

- 6.12 The identified land supply will offer flexibility and choice across the city. The following policy, accompanied by Table 6.2 sets out the allocations referred to in the Components of Housing Supply Table 6.1 above. As this is a review of the adopted 2017 Local Plan a commentary is also provided so it can be seen where the 2017 Local Plan allocations are underway or where they have been delivered, and those allocation reference numbers remain unchanged for clarity. New / amended allocation maps are at Appendix 9b.

## STRATEGIC POLICY

### Policy H2: Housing Allocations

1. Table 6.2 identifies the sites to be allocated for housing development alongside essential details that will support the principles of sustainable development. The development of all sites will also need to be considered in accordance with other policies in this Local Plan (and supporting documents) and the Infrastructure Delivery Plan, with the infrastructure needs of each site to be secured through legal agreements and developer contributions where appropriate.

2. The urban extension proposals at Keresley and Eastern Green are to be brought forward in full accordance with comprehensive Masterplans and in accordance with the Council's Urban Extension Design Guidance SPD.

Table 6.2 - Site Allocations for Housing

Site Ref	Site	Ward	Total Dwellings	GF / PDL	Essential Site Specific Requirements and Other Uses	HELAA Ref.
H2:1	Keresley SUE	Bablake	3,100	GF	Retail space within a local centre in the south of the site (policy R1). Distributor link road connecting Long Lane and Winding House Lane to be fully operational prior to the full completion of the SUE. Surrounding junction improvements as appropriate and identified through a robust TA. Provision of 2FE primary school and contributions towards a 8FE secondary school. Retention of medieval fishponds, ancient woodlands, important (ancient) hedgerows. Creation of publicly accessible green corridor along the Hall Brook and enhanced connectivity between the ancient woodlands. Protection of Jubilee Woodland. Inclusion of appropriate screening to existing residential areas.	
H2:2	Eastern Green SUE	Bablake	2,250	GF	15ha of employment land adjacent to the A45 (policy JE2), which is to be developed in tandem with the residential development. The provision of a new Major District Centre and a Local Centre (policy R1). Provision of 2FE primary school. New grade separated junction from the A45 to provide primary site access with surrounding junction improvements as appropriate. The new A45 junction should be fully operational prior to the occupation of the employment land and the Major District Centre, whilst no more than 250 homes should be occupied prior to this junction being fully operational (in accordance with Policy DS4D). Creation of publicly accessible green corridors along the Pickford Brook and its tributaries. Retention of medieval moat at Pond Farm and retention of important hedgerows. Inclusion of appropriate screening to existing residential areas. Buffering and screening at Pickford Green to protect the transition of land use into the wider Green Belt.	
H2:3	Walsgrave Hill Farm	Henley and Wyken	900	GF	Retention and enhanced setting of listed buildings at Hungerley Hall Farm. Site to incorporate blue light access linking the A46 to the University Hospital. Facilitate and work with Highways England on highways proposals linked to a new Grade Separated junction at Clifford Bridge. Provision of essential drainage and flood risk infrastructure.	HE002-24

H2:4	Land at Whitmore Park, Holbrook Lane	Holbrook	730	PDL	As part of mixed use scheme to deliver 8ha of redeveloped employment land (policy JE2). The retention of the sports field fronting Beake Avenue. Highway works to open up Swallow Road to public traffic as appropriate. Retention of locally listed building facades and boundary walls.	
H2:5	Paragon Park	Foleshill	700		2017 Local Plan allocation, <b>now delivered</b> .	
H2:6	Land at Browns Lane	Bablake	475	GF	Retention of important trees and hedgerows. Need to focus primary access to Coundon Wedge Drive.	
H2:7	Land at Sutton Stop	Longford	285	GF	Total Allocation is linked to extant permission (FUL/2013/0727) and should also include a 225 berth marina and ancillary provisions (as appropriate) and 1.5ha of employment land (policy JE2). The site should also incorporate in excess of 5ha publicly accessible green space and the inclusion of appropriate screening to existing residential areas. Development will need to ensure that highways access and provisions are adequate and suitable for the site. This could include remodelling of the junction at Sutton Stop and Grange Road and at Alderman's Green Road	
H2:8	Land West of Cromwell Lane	Westwood	240	GF	Creation of woodland area to the western boundary of the site to reflect Ancient Arden landscape characteristics and ensure defensible boundary to the wider Green Belt. Retain and enhance the setting of Westwood Farm and other listed buildings within and adjacent to the site. Inclusion of appropriate screening to existing residential areas. Explore opportunities to introduce residents parking schemes on site and along adjoining streets with surrounding junction improvements as appropriate.	
H2:9	Land at London Road/ Allard Way	Binley and Willenhall	200	GF	Retention and reuse of locally listed pumping station and lodge. Retention of important hedgerows and management of biodiversity/ ecology impacts. The provision of at least 2.5ha of publicly accessible green space as part of the development.	
H2:10	Former Lyng Hall playing fields	Upper Stoke	185	mix	Provision of 1ha of publicly accessible green space as part of development. 2017 Local Plan allocation, <b>now delivered</b> .	
H2:11	Elms Farm	Henley	150	GF	Creation of publicly accessible green space along eastern boundary of site.	
H2:12	Site of LTI Factory, Holyhead Road	Sherbourne	110	PDL		
H2:13	Grange Farm	Longford	105	GF	Retention of important hedgerows. Highway improvements to Grange Road. 2017 Local Plan allocation, <b>now delivered</b> .	

H2:14	Former Transco site, Abbots Lane	Sherbourne	100	PDL	Retention of sandstone boundary walls.	
H2:15	Land at Sandy Lane	Radford	250	PDL	Retention of the Daimler Office building on Sandy Lane.	R004-24
H2:16	Land at Carlton Road / Old Church Road	Foleshill	85	PDL	Retention of chimney, art-deco façade and railings of former weaving mill.	
H2:17	Nursery Sites, Browns Lane	Bablake	80	GF	2017 Local Plan allocation, <b>now delivered</b> .	
H2:18	Former Mercia sports field	Foleshill	75	GF/ PDL	Provision of 0.5ha of publicly accessible green space as part of development. 2017 Local Plan allocation, <b>now delivered</b> .	
H2:19	Land at Mitchell Avenue	Wainbody	50	GF	Existing sports facilities are to be re-provided at the site of the former Alderman Harris School at Charter Avenue or an appropriate alternative site within the local area as part of this development (in accordance with policy GE2).	
H2:20	Land at Durbar Avenue	Foleshill	45	PDL	As part of mixed use scheme to deliver 1.5ha of redeveloped employment land (policy JE2).	
H2:21	Woodfield school site, Stoneleigh Road	Wainbody	30	mix	New homes to link in with new railway station to be delivered as part of the wider NUCKLE project (policy AC6).	
H2:22	Land at the Junction of Jardine Crescent and Jobs Lane	Woodlands	25	PDL	Retail space within extended district centre (policy R1).	
H2:23	Land west of Cryfield Heights, Gibbet Hill	Wainbody	20	GF	2017 Local Plan allocation, <b>now delivered</b> .	
H2:24	Land West of Cheltenham Croft	Henley	15	GF		
H2:25	The Grange Children's Home, Waste Lane	Bablake	15	PDL/ GF	Locally Listed buildings to be retained and converted with limited new build allowed to support a comprehensive scheme. Dense tree boundaries to be retained to protect wider Green Belt setting.	
H2:26	Coventry Central Police Station, Little Park Street	St Michael's	600	PDL	Development needs to be sensitive to View Cones 8: Mile Lane and 10: Quinton Rd, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM009-24
H2:27	New Union Street Car Park	St Michael's	170	PDL	Development needs to be sensitive to View Cone 9: Mile Lane (Christ Church) as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM011-24

H2:28	New Gate Court Business Park, Paradise Street	St Michael's	303	PDL	Consented application for mixed use commercial and high rise flatted (C3) development FUL/2022/2635. Site to retain and enhance the Old City Wall Scheduled Ancient Monument (SAM) and may be required to divert a gas pipeline running through it.	STM001-23
H2:29	Former Vintage House, St Nicolas Street / Leicester Row	Radford	100	PDL	Development needs to be sensitive to the character of the Coventry Canal Conservation Area that it is located in.	R003-23
H2:30	Whitefriars Street Car Park	St Michael's	185	PDL	Development needs to be sensitive to View Cone 7: Parkside, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM012-24
H2:31	Paybody Building, Stoney Stanton Road	Foleshill	280	PDL	Existing NHS health facility within the city centre boundary that is likely to become available for residential or healthcare-based use or mix of both.	F008-24
H2:32	Dale Buildings, Tower Street	St Michael's	200	PDL	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 Aea and View Cone 1: Foleshill Rd, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM013-24
H2:33	The Allesley Hotel, Birmingham Road	Bablake	48	PDL	Retention and enhancement of adjacent listed buildings and heritage assets and the Allesley Village Conservation Area that the site is within. Consideration needed of the Allesley Bypass dual carriageway that runs along the south of the site.	Bab001-23
H2:34	Former Chace School, Chace Avenue	Binley and Willenhall	60	PDL		BW001-23
H2:35	Former School Site, New Century Park – Land to the South of Isadora Lea	Lower Stoke	93	PDL	Site was formally earmarked as a location for a primary school, but it has been determined that this is no longer needed.	LS001-23
H2:36	Land at Spon End	Sherbourne	750	PDL	Site part of Citizen Housing regeneration portfolio. 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.	SH004-24
H2:37	City Centre South	St Michael's	1,575	PDL	Total allocation is linked to extant Outline and Reserved Matters permissions: OUT/2020/2876 and PL/2023/0002533/RESM to provide a high-density mixed-use development that provides commercial and learning and community uses, and public realm works. Retention and Enhancement of heritage asset.	STM18-24

H2:38	Friargate – Land bounded by Railway, Grosvenor Road, Manor Road and including Greyfriars Green and Station Square	St Michael's	1,350	PDL	Total allocation linked to extant permission OUT/2011/0036 for a mixed-use development that includes office, residential, leisure and retail development. Retention and enhancement of listed Coventry Railway Station and Greyfriars Green Conservation Area and adjacent listed buildings. Development needs to be sensitive to View Cone 12, Spencer Park and Footbridge as outlined in the Tall Buildings Design Guide and the Three Spires View Management Framework.	STM014-24
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## Housing Development principles

- 6.13 Future housing developments will be designed to create new and stable communities providing a mix and choice of housing types and tenures. Opportunities to create new areas of housing as part of mixed-use developments will also be encouraged. In accordance with the NPPF the Council will also encourage new self and custom build programmes, and community-led housing schemes, where local people wish to build their own homes and promote the provision of entry-level homes as part of meeting affordable housing need.
- 6.14 When considering the suitability of a site for housing development that is not already allocated, Policy H3 must be considered to ensure it is situated within a sustainable location and will ensure the creation of an appropriate and acceptable residential environment.
- 6.15 The principles of supporting sustainable residential development which helps support healthy communities have been considered through a range of evidence and best practice as well as an overview of local services and facilities and their proximity to homes and development opportunities across the city. It is vital that new homes are well designed, resilient and adaptable for a range of users, are free from pollution, energy efficient, easily accessible to schools, shops, health facilities, leisure provisions, open spaces, public transport and a range of other services and facilities.
- 6.16 As set out in the above paragraph, it is important that dwellings provide adequate space to enable a good standard of living and the Nationally Described Space Standards are to be applied. In addition, the HEDNA explores the needs of different groups in Coventry, particularly (but not exclusively) relating to an ageing population. It is important that the provision of housing is able to meet the needs of the local community including those with mobility difficulties. Therefore, in line with the HEDNA policy sets out additional standards to help meet this need.
- 6.17 Should development come forward that is deficient against the criteria in policy H3 then the site-specific circumstances will be considered to understand the extent to which the criteria are not met and how mitigation might be provided.

Should it be deemed appropriate and justified without excessively impacting on development viability, developer contributions will be required via a Section 106 agreement. This will be managed through Policy IM1.

## **STRATEGIC POLICY**

### **Policy H3: Provision of New Housing**

- 1.** New residential development, both open market and affordable housing and including the conversion of buildings from non-residential to residential use and which provides opportunities for self-build homes and community led housing, must provide a high-quality residential environment that ensures all new dwellings:
  - a.** comply with Nationally Described Space Standards (NDSS);
  - b.** comply with internal and external standards set out in the Design Guide for New Residential Developments SPD, Householder Design Guide SPD and Open Space SPD;
  - c.** meet M4(2) - Adaptable and Accessible Dwellings;
  - d.** For major schemes, 10% of all new dwellings meet M4(3) - Wheelchair User Dwellings Adaptable and Accessible - of Building Regulation standards for access;
  - e.** 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; and
  - f.** contribute to the delivery of urban regeneration or to the creation of sustainable communities and overall enhance the built environment.
- 2.** New developments must result in a satisfactory residential environment for neighbouring and future occupiers.
- 3.** New developments must not result in existing businesses having unreasonable restrictions placed on them because of the new residential development.
- 4.** New developments should provide sustainable and liveable neighbourhoods, have consideration to the accessibility mapping as set out in the Council's Transport strategy and where possible have convenient, reasonable and practicable access that can be accessed safely and by all abilities to:
  - a.** local medical services;

- b. convenient shopping facilities;
  - c. primary school;
  - d. sustainable transport modes; and
  - e. high quality publicly accessible green space that can be used for a range of leisure and sporting activities, in line with the Open Space SPD.
- 5. Proposals should also be in conformity with all other relevant plan policies.
  - 6. Sustainable transport provision and 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.
  - 7. The delivery of custom and self-build homes and community led housing will be supported where they meet the criteria of this policy and are in accordance with all other development plan policies.

## Securing a Mix of Housing

- 6.18 National planning policy requires local planning authorities to plan for a mix of housing. The city has undertaken a Joint HEDNA with its Warwickshire neighbours, which sets out the housing needs for Coventry, including the need for all types of housing and the needs of different groups in the community.
- 6.19 Policy H4 is concerned with the mix of general market housing only, whilst Policy H6 refers to the mix of housing in respect of the affordable homes element of housing developments.
- 6.20 Where possible, large strategic sites should reflect the housing mix set out in the HEDNA. However, it is accepted that some locations, sites and their local context lend themselves to particular types and sizes of development and therefore a pragmatic approach will be taken, with the HEDNA being used as the starting point. It is important that the objectives of the plan as a whole are taken into account in achieving the mix of homes identified by the HEDNA over the plan period.

### Policy H4: Securing a Mix of Housing

- 1. The Council will require proposals for residential development to include a mix of market housing which contributes towards a balance of house types and sizes across the city in accordance with the latest Housing and Economic Development Needs Assessment (HEDNA) or its future equivalent.

- 2.** In assessing the housing mix in residential schemes the Council may take into account the following circumstances where it may not be appropriate to provide the full range of housing types in accordance with the latest Housing and Economic Development Needs Assessment or its future equivalent:
- a.** physical constraints, such as those associated with small sites of less than 5 houses and conversion schemes, where opportunities for a range of different house types are limited;
  - b.** locational issues, such as highly accessible sites within or close to a designated centre where larger homes and low/ medium densities may not be appropriate;
  - c.** sites with severe development constraints where housing mix may impact on viability;
  - d.** sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset;
  - e.** developments in parish or neighbourhood plan areas, where there is an up-to-date local housing needs assessment which provides a more appropriate indication of housing need; and
  - f.** evidence that there is no grant or equivalent funding available which would ensure that the development could viably proceed.

## **Managing the existing Housing Stock**

- 6.21 People's need for housing is met by both new build and through the existing stock. As such, it is important that there is a balance between the maximum use of existing dwellings and the development of new housing. This may involve an improvement in the quality of homes, including retrofitting to improve energy efficiency and address fuel poverty as well as the clearance and redevelopment of housing which has reached the end of its useful life, but only when this has been considered in line with the environmental management policies of this plan.
- 6.22 In line with the above, demolition and redevelopment schemes will be considered where the existing housing does not meet local housing market needs or is in a very poor state of repair. Regeneration will be undertaken to promote sustainable urban living, enhance the public realm, combat climate change, improve accessibility and address social deprivation. Replacement provision should also represent the most efficient use of land in accordance with the Local Plan density policy. Together these considerations will ensure that regeneration projects respond to the 3 aspects of sustainable development outlined in the NPPF.

## **Policy H5: Managing Existing Housing Stock**

1. Where appropriate, the existing housing stock will be renovated and improved, in association with the enhancement of the surrounding residential environment and to meet local housing needs. Where appropriate these works should include opportunities to retrofit existing properties with features that meet existing climate change requirements while maintaining the existing character of the existing property and to improve energy efficiency of existing homes.
2. Demolition and redevelopment schemes will be supported where:
  - a. Existing housing stock does not meet local housing market needs;
  - b. the redevelopment represents the principles of sustainable development;
  - c. the development does not result in a net loss in the quality and size / type of dwellings currently on the site, unless it can be robustly justified;
  - d. the development has considered the embodied carbon in existing buildings, along with waste disposal, transportation and construction; and
  - e. the development is in line with the requirements of all other relevant policies of the Plan.
3. The conversion of existing dwellings to uses other than primary residential will be resisted, unless very special circumstances can be demonstrated including why the non-residential use would better meet the need of the local area and the aims of the Local Plan than the existing dwellings.

## **Affordable Housing**

- 6.23 The NPPF provides the definition of Affordable Housing to which Policy H6 applies. The Council is committed to planning for high quality affordable housing for people who are unable to access or afford market housing. The policy intention is to ensure that a choice of housing is available to all in mixed tenure, balanced and sustainable communities.
- 6.24 In line with the NPPF, the HEDNA considers two main outputs, the need for social / affordable rented housing and consideration of the need for affordable home ownership products. It concludes an annual need of 941 Social / Affordable rental dwellings for newly forming households and 149 Affordable Home ownership dwellings. It should be noted that the need estimate is on a per annum basis and should not be multiplied by the plan period to get a total need. Essentially, the estimates are for the number of households who would be expected to have a need in any given year (i.e. needing to spend more than 30% of income on housing), and this does not necessarily need to be met by new build.

- 6.25 The NPPF sets out specific levels of requirement for affordable home ownership on development schemes, and once these specifications have been met councils can then specify their own requirement for any remaining affordable homes which need to be provided.
- 6.26 The Council's preference is for social rented housing and the mix of this would be determined in line with the advice from the Council's Housing strategy team using the Council's Homefinder Data which provides the most current information on local need at a particular point in time. Currently there is a particular need for larger family-sized affordable homes as people with this type of need do not progress through the waiting list as quickly as those in need of smaller accommodation. To ensure effective and timely delivery it is important that affordable housing is built on site wherever possible and is integrated into the development in a way which ensures it is indistinguishable from open market housing.
- 6.27 Purpose Built Student Accommodation (PBSA) has provided a significant portion of residential development in the city in recent years, and in line with Policy H10, any PBSA which is delivered outside of the defined university campus / boundary areas will need to contribute to the delivery of affordable housing in the city. Beyond the campus areas of the universities, PBSA is competing for residential land, much of which is required to deliver the urban-focused spatial strategy of the reviewed Local Plan. Should PBSA be permitted by virtue of the exceptions approach of H10, it should contribute to the delivery of affordable stock (in the form of a contribution), much of which will be needed to retain recent graduates and attract other young professionals in the city, ensuring they have affordable options available to them to live and work in the area. The calculation in policy is based on the Housing Delivery Test average number of students in student-only households calculation (2.5) multiplied by the Council's affordable housing unit threshold.
- 6.28 Build to rent will also be expected to contribute to affordable housing, in the form of affordable private rents. This will be a 10% provision requirement with a local unit threshold of 10 units. This approach recognises the unique circumstances of the build to rent model whilst ensuring a unified ownership and management of all homes for the long term. The discounted private rent should be managed collectively with the market units by a single build to rent landlord, as set out by national guidance. The affordable private rent homes should be fully integrated into the development with no differences between them and the market units. Eligibility for occupying affordable private rent homes should be agreed locally between the Council and the scheme operator with regard to local household income levels and local rent levels and with regard to criteria set out in national guidance.
- 6.29 The supporting text to Policy H13 sets out the mechanism that could be included in the Section 106 Agreement to recoup (clawback) the value of the

affordable housing provision that is withdrawn if affordable private rent homes are converted to another tenure or if the private market rent homes are converted to another tenure before the end of a covenant period.

- 6.30 Co-living developments will be expected to contribute to the delivery of affordable housing, in the form of affordable private rent.

## **STRATEGIC POLICY**

### **Policy H6: Affordable Housing**

#### **Proportion of Affordable Housing**

1. The Council will seek to maximise the delivery of affordable housing across the city, in accordance with the high level of need set out in the HEDNA. Affordable housing delivery should be in accordance with the Council's Affordable Housing SPD.
2. 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 housing waiting list, as identified and monitored by the Council's Homefinder data or future equivalent.
3. New residential developments of 10 or more dwellings (gross) located within the area identified at Appendix 9(c) on individual sites, or on sites of more than 1ha will be required to provide 25% of all dwellings as affordable. This excludes Purpose Built Student Accommodation, co-living accommodation and Built to Rent accommodation, where the affordable housing provision is set out in points 5, 6 and 7 of this policy.
4. Affordable housing will be expected to be provided on site with the exception of Purpose Built Student Accommodation (PBSA) as set out in Point 5.
5. On sites providing 25 bed spaces or more of Purpose Built Student Accommodation (PBSA) outside of Campus as defined at policy H10, a commuted sum will be required in lieu of on-site 20% affordable housing provision
6. On sites providing build to rent accommodation of 10 units or more, developments will be expected to provide 10% of all dwellings as affordable private rent in line with the following:
  - a. The affordable rent homes should be in accordance with the requirements of the PPG and be at genuinely affordable rents to be agreed with the council.

- b. The eligibility criteria for the occupants of the affordable homes and the discount, size and mix of the affordable units is to be agreed with the council.
  - c. Affordable private rent and private market rent units within a development should be managed collectively by a single build to rent landlord (no need for the involvement of a registered landlord). The affordable private rent should be distributed throughout the development and physically indistinguishable from the market rent homes in terms of quality and size.
7. On sites providing co-living accommodation of 25 bed spaces or more (gross), developments will be expected to provide 25% of all bed spaces as affordable private rent.

### **Tenure**

8. The affordable housing tenure and mix will be based on the need highlighted in the latest HEDNA supplemented with Homefinder (or equivalent) data. On this basis the Council will expect to seek:
- a. a tenure split of 60% social/affordable rent and 40% intermediate provision,
  - b. of the social and affordable rent provision a minimum of half should be for social rent; and
  - c. Accounting for any nationally set contribution for intermediate home ownership products, the remainder of the affordable home ownership is to be delivered as other intermediate home ownership products.
9. Proposals must meet national policy requirements relating to affordable home ownership initiatives and local eligibility criteria, and where these are updated or altered, the latest requirements will be applicable.

### **Housing Size Mix**

10. The expected mix for affordable housing provision will initially be guided by the HEDNA, however, through engagement with the Council and Registered Providers, positive weight will be given to a housing mix that is also informed by the latest Homefinder data (or future equivalent) to ensure the delivery reflects the most up to date need and circumstances. The affordable housing mix should reflect the overall mix and type of housing proposed across the application site guided by an updated affordable housing SPD.

### **Where a policy compliant provision is not provided**

11. Where the required specified level, tenure and size mix of affordable housing cannot be provided on site, including for reasons of viability, robust evidence must be presented to justify a reduced or alternative form of contribution.

12. A reduction in the requirements of policy EM11 may be presented for assessment in order to maximise Affordable Housing delivery.

### **Design Standards**

13. Through high design standards, new affordable housing units must be appropriately integrated within developments and with other affordable homes adjoining the site.
14. Affordable housing proposals must be in accordance with the design principles set out in Policy H3, including NDSS standards and the internal and external standards set out in the Design Guide for New Residential Developments SPD and Householder Design Guide SPD.

## **Gypsies and Travellers**

- 6.31 A Gypsy and Traveller Accommodation Assessment (GTAA) was completed in February 2023. This concludes that there are currently 5 authorised pitches on Burbages Lane and an expected supply of 12 pitches following the redevelopment of the Siskin Drive site. This is able to cater for the assessed need (15 pitches) over the short term 2022/23 to 2026/27. Over the longer plan period to 2041 the GTAA concludes there will be a shortfall of 6 pitches but that these could potentially be accommodated at Burbages Lane.
- 6.32 In order to provide resilience over the plan period the GTAA also recommends a series of requirements which should be taken into account when assessing planning applications. The study recommends that the criteria in policy are updated to ensure sustainability of location, adequate access and servicing, appropriate screening and landscaping, free from environmental hazards and flood risk, integration with the local community, enabling mixed business and residential accommodation and make adequate provision for on site requirements including play areas, storage, provision for recycling and waste management. The GTAA also recommends supportive policy for the provision of transit facilities or negotiated stopping points.

### **Policy H7: Gypsy and Traveller Accommodation**

1. Provision will be made for at least 6 permanent pitches for Gypsies and Travellers.
2. Proposals for additional Gypsy and Traveller sites outside of the Green Belt (and within it, if very special circumstances have been demonstrated) will be assessed against the following criteria as set out in the Council's Gypsy and Traveller Accommodation Assessment (GTAA):
  - a. The site's use should not conflict with other development plan policies or national planning policy relating to issues such as risk from flooding,

including sites not being in functional floodplains; contamination; or agricultural land quality;

- b.** The site should be in a sustainable location in terms of being within reasonable travelling distance of local services and community facilities, including health care and schools;
  - c.** The site should enable safe and convenient pedestrian and vehicle access to and from the public highway, and adequate space for vehicle parking, turning and servicing;
  - d.** The site should be served by adequate water and sewerage connections, and drainage, power and waste and recycling facilities;
  - e.** Proposals must not have an adverse impact on the amenities of occupiers of nearby properties or the appearance or character of the area in which it would be situated, with proposals including appropriate landscaping;
  - f.** The site must not be affected by environmental hazards that may affect the residents' health or welfare;
  - g.** Proposals should make adequate provision for on-site facilities that meet best practice for modern Traveller site requirements, including play areas, storage and mixed business and residential accommodation; and
  - h.** The proposal must be well related to the size and location of the site and respects the scale of the nearest settled community.
- 3.** Proposals for transit and / or stop over areas will be supported where they meet an evidenced need and accord with other policies in this plan.

## **Specialist Housing**

- 6.33 As set out in the HEDNA there is a need to ensure that the Local Plan can positively support all specialist forms of housing including a range of types of older persons housing, housing with elements of care, and hostels. As the population ages, it can be expected that there will be associated increases in the numbers of people presenting with long term health problems or disability.
- 6.34 Invariably, there will be a combination of those with disabilities and long-term health problems that continue to live at home with family, those who chose to live independently with the possibility of incorporating adaptations into their homes (see Policy H3) and those who choose to move into supported housing.
- 6.35 The HEDNA identifies a range of different types of older persons accommodation Definitions of Different Types of Older Persons' Accommodation.
- Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared

amenities such as communal gardens, but does not include support or care services.

- Retirement living or sheltered housing (housing with support): This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.
- Extra care housing or housing with care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.
- Residential care homes and nursing homes (care bedspaces): These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

6.36 Whilst it is important that a range of specialist accommodation will need to be supported over the plan period, in Coventry the need is particularly for affordable housing (housing with support).

### **Policy H8: Specialist Housing including specialist housing with elements of Care, Older Persons accommodation and hostels**

1. Proposals for specialist housing, which includes accommodation with elements of care, support for people in need and older person housing will be supported where a local need can be demonstrated. Positive weight will be given to proposals that provide private rental opportunities that are affordable for those who do not meet social care eligibility criteria.
2. Proposals will be encouraged in areas which are accessible by a choice of means of sustainable transport and which are easily accessible to the key local services listed in point 3 of policy H3 and which are appropriate to the specific needs of the residents and employees.
3. Proposals should be laid out to allow the intended residents to live with the maximum level of independence that considers the changing needs of residents and should be of a high quality and design, compatible with the character of the

surrounding area and be in line with the design requirements set out in Policy H3 where applicable.

4. Where relevant, proposals should ensure all dwellings meet M4(2) and 10% of dwellings meet M4(3) standards.

## **Residential Density**

- 6.37 The NPPF requires that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Local plan policies should make as much use as possible of previously-developed or 'brownfield' land.
- 6.38 The NPPF specifically encourages the identification of locally set density requirements that reflect local circumstances. Housing density can affect the quality of life, the environment, the economy, and the social cohesion of a place. Higher density developments are recognized to encourage the provision and use of public transport and the retention and development of social and community facilities.
- 6.39 The Residential Density Study (2024) and accompanying Background Paper seek to maximise the effective use of land in a way which takes into account Coventry's distinct local context, market delivery and best practice.
- 6.40 Coventry demonstrates the scale of built form and residential density increasing towards the city centre, and therefore the density of new residential development should reflect the patterns which have emerged through the study.
- 6.41 It is important that density policies are applied in tandem with other policies of the plan and related SPDs to ensure appropriate levels of amenity space, landscaping and other onsite infrastructure. As such the Council's policy is set in the context of net densities that seek to maintain:
- At least 20% of gross site area to remain undeveloped on sites in excess of 2ha
  - At least 15% of gross site area to remain undeveloped on sites below 2ha;
  - At least 10% of gross site area to remain undeveloped on sites within the transition zone
  - At least 5% of gross site area to remain undeveloped on sites within the city centre
- 6.42 The undeveloped areas should focus on providing localised green spaces, landscaping and other public realm provisions as appropriate. Main roads, parking spaces and gardens have been considered essential elements of a residential property and are counted towards the developable area. The reduction of site area to reflect density will also help to support the Council's green space standards and ensure high quality built environments. Exceptions to this may exist as part of site proposals to reflect site specific circumstances.

## Policy H9: Residential Density

1. Residential development, including conversions, must make the most effective and efficient use of land.
2. Proposed development density should be informed by a site's local character and context, in alignment with other plan policies.
3. To ensure that the most effective use of land, new developments, with relevant consideration to Part 2 of this policy, should seek to deliver the following densities:
  - Greenfield sites – 35 dwellings per hectare (net).
  - Brownfield sites 45 dwellings per hectare (net).
  - Sites within the City Centre Transition Zone\* 125 dwellings per hectare (net).
  - Development within the defined City Centre boundary 250 dwellings per hectare (net).

\*City Centre Transition Zone as shown at Appendix 9(d)

\*\*City Centre boundary as shown at Appendix 9(d)

## Student Accommodation

- 6.43 The Council commissioned a Purpose Built Student Accommodation (PBSA) Study in 2024, to provide an up to date position in terms of the student market and to reflect upon the proliferation of PBSA in the city as evidenced by the Authorities Monitoring Reports. Whilst student accommodation provides an important element of residential need for the cities' two universities (Coventry and Warwick, the campus for the latter also sitting within Warwick District), in order to deliver sustainable development the situation needs to be carefully managed.
- 6.44 The study made a series of recommendations based upon its assessment of the current market. These include a zoned approach to determine where PBSA should be encouraged to be located (and where it should not be encouraged), recommendations for good quality design and adaptability especially for future potential changes of use, up to date understanding of the current market including the universities own masterplans, and ongoing monitoring.
- 6.45 The changing face of student accommodation means that it now sits within a variety of use class categories. In terms of creating living environments specifically for students within existing residential provisions this policy will only relate to schemes that will occupy more than 6 students. Where proposals relate to purpose built student accommodation or the conversion of non–

residential properties to student accommodation however the policy will apply in all cases.

- 6.46 The tenure of student accommodation will be secured through a Section 106 agreement. This reflects the fact that should the properties be occupied by other aspects of the city's population then it would be required to contribute affordable housing and potentially other Section 106 contributions. Should the tenure change to general market or affordable housing then such contributions will need to be considered through a variation of the Section 106 agreement and/or planning permission.
- 6.47 For the purposes of 'Campus' within policy H10, 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.

### **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 circumstances demonstrate otherwise.
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 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.
3. Proposals 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.
4. Developments that comprise a predominant studio ratio will be considered in line with the most up to date available evidence.
5. Proposals should comprise predominantly cluster units of no more than 8 units per cluster.
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 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.

## 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 Occupation Development Plan Document alongside other policies in the adopted Local Plan.

## Build to Rent

- 6.49 The NPPF glossary defines Build to Rent as 'Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.'
- 6.50 Build to Rent is an emerging sector which has significant potential to address some of Coventry's local housing need particularly in line with the increased densification, urban-focused strategy and a need to deliver a range of housing types. The build to rent policy has been developed in recognition of the unique way that build to rent operates. Build to rent relies on income through rent over several years, rather than an upfront return on sales.
- 6.51 The Build to Rent policy along with Policy H6 provides the specific approach to the affordable housing offer for Build to Rent proposals. The approach recognises the build to rent model whilst ensuring a unified ownership and management of all the homes for the long term. Where a build to rent development meets the specific affordable housing threshold, Policy H6 states the affordable homes should be discounted private rent, managed collectively with the market units by a single build to rent landlord, as set out by national guidance. The affordable private rent homes should be fully integrated into the development with no differences between them and the market units. Eligibility

for occupying affordable private rent homes should be agreed locally between the Council and the scheme operator having regard to local household income levels and local rent levels and to criteria set out in national guidance.

- 6.52 Circumstances may arise where developers need to sell all or part of a build to rent scheme into owner occupation or to multiple landlords or, exceptionally, to convert affordable private rent units to another tenure. As a result, national guidance states Section 106 Agreements should include a mechanism to recoup (clawback) the value of the affordable housing provision that is withdrawn if affordable private rent homes are converted to another tenure or if the private market rent homes are converted to another tenure before the end of a covenant period. National guidance also includes a formula that may be used to calculate the amount of clawback payable when affordable private rent homes are withdrawn with the proceeds to be spent on the provision of alternative affordable housing.
- 6.53 Consideration should also be given to a covenant period for the retention of private market rent homes in that tenure and potential compensation mechanisms in the event that private market rent homes are sold before the expiration of an agreed covenant period.

## **Policy H12 – Build to Rent**

1. Proposals for the development of Build to Rent housing will be supported where they are in accordance with all other development plan policies and where they comply with the following criteria:
  - a. the development provides a high-quality residential environment that improves housing choice and makes a positive contribution to the achievement of mixed and sustainable communities in accordance with Policy H3;
  - b. all the dwellings are self-contained and let separately;
  - c. the build to rent housing is under unified ownership and will be subject to common management;
  - d. the development will provide professional and on-site management;
  - e. the development will offer tenancies of at least 3 years available to all tenants;
  - f. the development complies with the Nationally Described Space Standards;
  - g. The homes will be secured as part of a Section 106 agreement, which should include the process for the management and letting arrangements, covenants the build to rent homes are held under and any clawback arrangements.
  - h. The development delivers a level of affordable housing as set out in Policy H6.

## Co-Living

- 6.54 As set out in the HEDNA, the concept of co-living in its modern form of housing is relatively new, and whilst it is not specifically defined in the NPPF, it is often used as part of a wider definition relating to a type of intentional community where residents share living space and a set of interests, values and/or intentions.
- 6.55 In its current form, modern co-living in the UK tends to be urban focused and integrated into a single building, house, or apartment, a sharing of amenities, and a demographic trend towards young professionals. As a market segment, this is most well developed currently in London, in models that offer private bedrooms, shared common spaces and community events, and an all-inclusive rent. However the model is starting to expand to other cities, especially due to the decline in affordability of home ownership, the associated demand for private rental housing but also for the flexibility and choice it provides including shared live / workspace opportunities.
- 6.56 Given that this is an emerging housing sector, it is important that co-living schemes are distinguished from HMOs and that in determining that distinction this is reflective of the local context.
- 6.57 In line with the recommendations of the HEDNA and its citation of emerging models of typical co-living schemes the City Council defines Co-Living developments as shared living that comprises small private living accommodation alongside communal kitchens, living areas, outside amenity space and other amenities that is under a common management and would typically come under the sui-generis use as they are non-self-contained market housing.
- 6.58 In the absence of a clear national policy position on co-living developments the Co-living policy has been developed in recognition of the growing attractiveness of this form of housing in the emerging housing market and to ensure co-living schemes provide good quality residential accommodation; support the Council's objectives of creating sustainable and healthy neighbourhoods; and contributes to meeting the city's housing need.
- 6.59 Drawing on the policy frameworks established in the London Plan, the HEDNA provides detailed recommendations for a policy which supports high quality co-living schemes against a number of criteria. The HEDNA analysis concludes that there is a market for co-living in Coventry and while it is in its infancy, the current co-living business model and characteristics principally draw on a large base of transient younger, high skilled professional households and individuals - particularly those without dependents.

- 6.60 The Council has based the minimum private bedroom size of 25sqm for a single occupancy room on policy and guidance on co-living produced by other local authorities, namely the core cities research undertaken by SWAP Architects for Birmingham City Council 'Co-living Key Metrics' (data on UK co-living schemes located outside of London). The Council has used this research by virtue of the size and profile of many of the core cities being comparable with Coventry.
- 6.61 A two-person room should be designed for two people, including greater distinction and separation between sleeping and living areas and not just a minor enlargement of a single occupancy room.
- 6.62 Private rooms should include an ensuite, seating, desk space for home workings and sufficient storage space for clothes, luggage cases, bathroom items, laundry, general and recyclable waste and for other possessions. It should also provide a good living environment in line with the Council's New Residential Development Design Guide SPD, including good levels of natural light, outlook, privacy and ventilation.
- 6.63 The policy stresses the importance of adequately sized communal space to ensure an overall high-quality residential environment. This includes ensuring a range of indoor communal spaces are provided such as kitchens, lounges, dining rooms, workspaces and indoor recreation spaces for the exclusive use of residents without a charge and that these are sufficient so they can be used by residents at relatively high levels of demand.
- 6.64 The Council has based the average internal communal amenity space of 4.5sqm per bedspace to be provided, also on the core cities researched by SWAP Architects for Birmingham City Council 'Co-living Key Metrics' (data on UK co-living schemes located outside of London, again because the size and profile of the core cities the research was based on were considered as comparable with Coventry).
- 6.65 Internal communal space excludes laundry rooms, toilets, residents' storage, circulation space, any space that residents incur additional cost to access and use, spaces that are open to the public to use or are not for the exclusive access and use of residents, management areas, cycle storage, car parks and external communal space.
- 6.66 The policy stresses the importance of communal kitchens and sets a maximum number of 8 bedrooms per communal kitchen. This is in line with the Council's maximum number of bedspaces per cluster unit for PBSA developments, given the similarity in residential accommodation. Communal kitchens, along with other internal communal amenity space should be sufficient, in terms of location, spread, facilities and size, to meet the requirements of the intended number of residents at times of relatively high demand. Shared kitchens should have convenient access that does not require any residents to travel between

different floors and which has adequate facilities and space for residents to store food and cooking and eating utensils and to prepare meals at times of relatively high demand (typically 6pm until 8:30pm).

- 6.67 Adequate laundry and drying facilities will be provided solely for the use of residents and should not also be used by the management company and be separate from the residents' internal communal space. At least one washer and one dryer should be provided for every 10 residents along with an additional secure and naturally ventilated space for air drying clothes.
- 6.68 Co-living schemes should include adequate onsite communal outdoor amenity space in line with the Council's New Residential Development Design Guide SPD and Open Space SPD and is designed and managed in a way that fosters social interaction and encourages engagement between people.
- 6.69 Exceptions to the space standards set out in the policy will only be considered where a robust justification has been provided to the satisfaction of the Council. This could include appropriate evidence that to deliver innovative high-quality design, deal with site specific issues or respond to local character, adhering to the standards is not feasible due to physical constraints or financial viability issues. Any reduction in standards as a result must demonstrate that residential amenity will not be significantly diminished.
- 6.70 Co-living schemes will be required to contribute to the delivery of affordable housing in the form of discounted private rent as set out in Policy H6. A 25% provision will be required on schemes of 25 co-living bedspaces or more. This is based on the Housing Delivery Test ratio calculations for student living, by reason of the most comparable residential model. Shared accommodation like co-living is not an affordable housing product as it does not meet minimum housing space standards and does not provide stable long-term accommodation that meets the affordable housing need in the city.
- 6.71 A management plan should accompany any planning application showing how the whole development will be managed and maintained and how it will be positively integrated into the surrounding communities. The agreed management plan should be secured through planning condition or a Section 106 agreement and should include, but not be limited to, detailed information on:
  - a. security and fire safety procedures
  - b. moving in and out arrangements
  - c. the maintenance and repair of internal and external communal areas including cycle storage
  - d. cleaning regime of communal spaces and private units
  - e. how linen changing services will operate

- f. how deliveries for servicing the development and residents' deliveries will be managed
  - g. crime prevention and anti-social behaviour measures
  - h. key responsibilities of the site staff which should include the organisation of social activities and a system communication for residents to foster a sense of community
  - i. promoting good neighbourliness
  - j. an annual monitoring and review framework to ensure the effectiveness of the management plan
- 6.72 Tenancies should be for a minimum of three months to ensure co-living developments do not effectively operate as a hostel or hotel. A maximum stay should be defined for short-term lets, for example, twelve months. However, tenancy durations should be reviewed on an on-going basis to ensure they remain appropriate.
- 6.73 Developments will be encouraged to be designed in a way that can be easily converted into self-contained policy compliant dwellings so as to provide flexibility to respond to changing needs if required.

### **Policy H13 – Co-living**

1. Co-living proposals will be supported where they are in accordance with all other development plan policies and where they comply with the following:
  - a. it is of good quality and design and adhere to a minimum bedroom size of 25sqm for a single occupancy room, inclusive of an ensuite and storage space;
  - b. it is well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency;
  - c. it is under single management;
  - d. The facility has a concierge or other adequate safety and security onsite personnel;
  - e. its units are all for rent with minimum tenancy length of no less than three months;
  - f. The average internal communal amenity space is at least 4.5sqm per bedspace;
  - g. communal facilities and services are provided that are sufficient, in terms of location, spread, facilities and size, to meet the requirements of the intended number of residents at times of relatively high demand and offer at least:

- h.** Direct access to a communal kitchen that does not require any residents to travel between different floors and which has adequate facilities for a 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.
  - i.** outside communal amenity space (roof terrace and/or garden);
  - ii.** internal communal amenity space (dining rooms, lounges, workspace); and
  - iii.** laundry and drying facilities.
- i.** the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes;
- j.** a management plan is provided with the application;
- k.** it delivers a level of affordable housing (discounted private rent) as set out in Policy H6.

## 7. Retail and Centres

### Key Evidence

Retail and Centres Study Stage 1 April 2023

Retail and Centres Study Stage 2 February 2024

Retail and Centres Background Paper 2024

### Overview

- 7.1 The role and function of town centres nationally is changing as people shop and undertake leisure activities in different ways than they have done in the past. As such, town centres need to diversify, making wider provisions to support their community, whilst ensuring they are attractive, diverse and accessible to those wanting to use them. Successful centres are of vital importance to local communities across the city as they play an important part in supporting economic growth, encouraging investment, urban regeneration and job creation.
- 7.2 Retail and centres in Coventry, along with the rest of the UK are facing many challenges. Online shopping trends, the pandemic, economic uncertainty and the cost of living have all had an impact. The commercial sector, which includes restaurants, cafes and recreational, cultural and other uses has also experienced major changes and challenges in recent years but with leisure spend expected to increase in real terms in the future, such uses will continue to be an important component of a town centre's offer.
- 7.3 The NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities. Planning policies should define a network and hierarchy of town centres and the extent of the town centre boundaries should be defined.
- 7.4 The NPPF determines what uses are important to the vitality and viability of town centres. It defines 'Main Town Centre Uses' as follows: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
- 7.5 In order to protect the vitality and viability of Town Centres, should any of these uses be proposed outside of a town centre boundary, a 'sequential test' will be applied to planning applications looking first at whether these could be accommodated in a centre, then edge of centre, with out of centre sites only being suitable for consideration as a last resort.

- 7.6 With this in mind this plan will support new town-centre developments across Coventry building upon the NPPF's centres-first approach and establishing the city centre as the primary focus for appropriate investment. It sets out Coventry's hierarchy of centres, as well as identifying a range of proposals which will support and enhance the respective roles of these centres. Proposals will also be encouraged which diversify the range of uses in designated centres without compromising the shopping function, particularly those uses which make the town centre more attractive to residents, employers, shoppers and visitors.
- 7.7 Across the city there are also a range of out of centre retail parks. It is recognised that whilst these areas currently complement the city's retail offer, any proposals for the future expansion, intensification or changes of use at these locations should be carefully assessed to ensure that they do not have a detrimental impact on designated centres and any existing, committed or planned town centre investment.
- 7.8 The city also contains a network of local centres and local shops serving the daily needs of local communities. These facilities are within easy walking distance of many people thus reducing the need to travel and contribute towards sustainable communities.
- 7.9 To support the review of the Local Plan a Retail and Centres Study was commissioned to inform Local Plan Policy. It assesses whether there is any need to allocate sites for retail and the capacity for these (to ensure they serve an appropriate level of need without undermining other centres), sets out a recommended centres hierarchy, and advises on the application of the sequential and impact tests.

## **Retail Growth**

- 7.10 Centres now serve a much wider range of needs than retail. However, retail is still an important aspect of centres and assessment has been undertaken to consider whether any further growth in this sector needs to be specifically planned for. The new Strategic Urban Extensions at Eastern Green need to provide retail space for the day to day needs of these growing communities and as such this need has been defined.

### **Policy R1: Delivering Retail Growth**

1. The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and other policies within this plan.

Site	Proposed floor space (sq.m gross)	Details
New Eastern Green District Centre	Up to 10,000	To include a range of retail and leisure uses
New Eastern Green Local Centre	Up to 1000sqm	<p>1 To include a range of small scale units providing a range of local community uses and top up provisions.</p> <p>2 The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area.</p> <p>3 Further retail, leisure and other town centre uses at Arena Park and Brandon Road Major District Centres will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider tourism functions.</p>
New Keresley Local Centre (South)	Up to 1,500	Local centre to include a range of small scale units providing a range of local community uses and top up provisions.

## Centres Hierarchy

- 7.11 The Centres Hierarchy is defined in Policy R3. Maps can be seen at Appendix 9e. At the top of the Hierarchy is Coventry City Centre. Policy R2 sets out the development strategy for the centre: it is the main shopping and town centre

use destination and it needs to remain competitive, not just in the wider region but also locally.

- 7.12 Coventry City Centre is generally a vital and viable centre, serving shoppers from across the City and beyond, particularly for comparison (eg clothes, shoes, household goods) shopping. However, it is demonstrating clear signs of weakness, including a declining comparison offer and high and increasing vacancy rates.
- 7.13 The centre however does have a strong leisure service-orientated function, including a reasonably strong food and beverage offer. This provides a good basis for a diversified city centre offer which, together with the delivery of planned new developments and improvements, will help to ensure the City Centre's continued health and role at the top of the City's retail hierarchy.

## **Policy R2: Coventry City Centre – Development Strategy**

- 1.** The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by:
  - a.** Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play;
  - b.** Enhancement of its retail and leisure offer to strengthen the city's sub-regional role;
  - c.** Provision of high quality office space;
  - d.** Becoming a hub for education;
  - e.** Including a variety of places to live which cater for different needs;
  - f.** Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;
  - g.** 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;
  - k.** High quality sustainable built design;
  - l.** Continuing to develop a vibrant and attractive night time economy;
  - m.** Providing opportunities to improve health and wellbeing;

- n. Continuing to support greater integration of the university within the wider city centre in accordance with the City Centre policies of this plan;
- o. Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch;
- p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for de-culverting wherever possible.

7.13 To ensure that the vitality and viability of town centres is protected and enhanced it is important that a hierarchy of centres is established, in line with the NPPF. As set out previously Coventry City Centre sits at the top of this hierarchy. In line with the recommendations of the Retail and Centres Study 2024 the following hierarchy is established.

## **STRATEGIC POLICY**

### **Policy R3: The Network of Centres**

1. To support the city centre, the Council will designate, enhance, maintain and protect a network of Centres consisting of Major District Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment.

- a. A residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre;
- b. Improvement to the environment and accessibility will be promoted and encouraged.

2 Centre boundaries and Primary Shopping Areas (PSA) for the following Major District Centres are shown on the Policies Map at:

- a. Arena Park;
- b. Cannon Park;
- c. Brandon Road.

They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city.

3. Centre boundaries and Primary Shopping Areas for the following District Centres are shown on the Policies Map at:

- a. Ball Hill;
- b. Bell Green;

- c.** Brade Drive;
- d.** Daventry Road;
- e.** Earlsdon;
- f.** Eastern Green\*
- g.** Foleshill;
- h.** Jardine Crescent;
- i.** Jubilee Crescent.

They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable.

**4** Centre boundaries for the following Local Centres are shown on the Policies Map at:

- a.** Acorn Street;
- b.** Ansty Road;
- c.** Baginton Road;
- d.** Bannerbrook;
- e.** Barkers Butts Lane;
- f.** Binley Road;
- g.** Birmingham Road;
- h.** Broad Park Road;
- i.** Charter Avenue;
- j.** Eastern Green\*
- k.** Far Gosford Street;
- l.** Green Lane;
- m.** Hillfields;
- n.** Holbrook Lane;
- o.** Holyhead Road;
- p.** Keresley Road;
- q.** Keresley South;\*

- r. Longford;
- s. Quorn Way;
- t. Radford Road;
- u. Station Avenue;
- v. Walsgrave Road;
- w. Willenhall;
- x. Winsford Avenue.

They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable.

\*Eastern Green District and Local Centres and Keresley South Local Centre are identified as broad locations due to the sites not yet being built out.

- 7.14 In line with the NPPF and to ensure that the vitality and viability of the centres hierarchy is not undermined it is important to establish an approach for the consideration of Main Town Centre uses where these are proposed outside of a centre.

## STRATEGIC POLICY

### Policy R4: Out of Centre Proposals

1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).
2. Sequential Assessment
  - a. A Sequential Assessment will be required for all Main Town Centre use proposals or any other use within use class E and F (or subsequent equivalent of these use classes), outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3.
  - b. Where in-centre options are exhausted, the sequential assessment will be applied to edge of centre locations as follows:
    - Where there is a defined Primary Shopping Area within a centre, retail proposals which are within 300m of a defined Primary Shopping Area boundary as follows:
      - i. Arena Park;

- ii. Cannon Park;
  - iii. Brandon Road.
  - iv. Ball Hill;
  - v. Bell Green;
  - vi. Brade Drive;
  - vii. Daventry Road;
  - viii. Earlsdon;
  - ix. Foleshill;
  - x. Jardine Crescent;
  - xi. Jubilee Crescent.
- Other Main Town Centre use proposals within 300m of a defined centre boundary
- c. Retail proposals close to centres which do not have a defined PSA.
- 3. Impact Test**
- a. An Impact Test will be required for all retail and other Main Town Centre use proposals outside a defined centre that exceed:
    - 1,000 sqm gross for schemes expected to impact on, or have the potential to impact on Coventry City Centre;
    - 500 sqm gross for schemes expected to impact on, or have the potential to impact on the Major District Centres; and
    - 250 sqm gross for schemes expected to impact on, or have the potential to impact on the District Centres.

The Assessment of Impact should be prepared in accordance with national guidance and consider the potential impact on the vitality, viability, role and character of a defined centre(s) within the centres hierarchy (as set out in policy R3).

Centres to be considered when undertaking sequential assessments and impact tests will be considered on a case-by-case basis.

## **Retail Frontages and Ground Floor Units in defined centres**

- 7.15 Designated centres have been identified on the basis of their function and role within local communities, with a primary purpose of making retail and shopping provisions available to their local community in a sustainable and accessible way. The role and offer of centres is changing though and the need for flexibility is becoming increasingly important. This is particularly true within Coventry where vacancy rates are relatively high. Therefore, with the exception of the

city centre, there are no plans to designate primary or secondary retail frontages.

- 7.16 When considering uses within the centres hierarchy this is generally focused towards the ground floor of units. As such, the ground floor element of these units is of primary importance as they offer the 'shop windows' for the centre.
- 7.17 By considering the issues identified in Policy R5, such proposals will be assessed in the context of ensuring and maintaining a viable and vibrant centre with lively street frontages.
- 7.18 By way of prominence and size of the unit, consideration will need to be given to the character of the centre and how the unit in question compares to other units within the centre. For example, Coventry's defined centres are characterised by a concentration of smaller units supplemented by a small number of larger units that are more prominent in terms of size and frontage within the centre. They are also often 'anchor' type units within the centres and provide a principle focus and attraction. The change of use of such a unit is likely to have a greater impact in terms of prominence and frontage than the change of use of a smaller unit. Furthermore, consideration will also need to be given to the layout of the centre. This will need to have regard to whether the centre is a single grouping of units in a continuous row or if it is segregated by roads or open space etc. Where a centre is focused around more than one grouping of units, it should normally be the single grouping that is considered when examining the prominence of the unit. Where it is a single grouping the whole centre should be assessed. Further detail can be found in the Design Guidance for Shopfronts SPD.
- 7.19 It may also be important to consider the highway implications of non-retail proposals, especially if such proposals involve larger social or community provisions which may require significant car parking or concentration of activity at certain periods.

### **Policy R5: Retail Frontages and Ground Floor Units in defined centres**

- 1. Proposals to use ground floor units within defined centres for non-A E class uses will normally be permitted provided that:
  - a. the primary function of the centre would not be undermined in the context of Policy R3;
  - b. the use would make a positive contribution to the overall role, vitality and viability of the centre;
  - c. the use is compatible with other Plan policies.

2. Proposals should seek to actively enhance the frontage of a unit within a defined centre in accordance with the Design Guidance for Shopfronts SPD

## **Restaurants, Bars and Hot Food Takeaways**

- 7.20 The creation of food and drink uses have become increasingly flexible in recent years following changes in permitted development rights and reflects the change and diversification of modern town centres.
- 7.21 The Council has pledged to improve its population's health and wellbeing and to reduce health inequalities. One of the challenges the Council faces in promoting healthy eating is the availability of foods high in fat, salt and sugar in local neighbourhoods, including the prevalence of hot food takeaways in some areas.
- 7.22 Such uses do, however, have the potential to cause significant problems with impact upon residential amenity, highways and parking. Hot food takeaways often attract considerable customer numbers and are regularly associated with issues such as litter, waste disposal, noise, odour, traffic and health. For a combination of these reasons, they will normally only be supported within defined centres where residential amenity is less likely to be an issue and will be resisted elsewhere. Where homes are situated above such premises, specific care will need to be given to odour extraction, noise insulation and general public convenience. Where appropriate provisions cannot be included then such uses will not be supported, even within designated centres.

## **Policy R6 Restaurants, Bars and Hot Food Takeaways**

1. Outlets should be located within defined centres and will normally be discouraged outside those locations.
2. Proposals within defined centres will be permitted provided they:
  - a. would not result in significant harm to the amenity of nearby residents or highway safety;
  - b. would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;
  - c. are in accordance with the emerging Adopted Hot Food Takeaway Supplementary Planning Document and any subsequent replacement
  - d. are compatible with other Plan Policies.

## 8. Communities

### Key evidence

The One Coventry Plan

Playing Pitch and Outdoor Sports Strategy (August 2023)

Indoor Sports Facilities Strategy

University masterplans

Infrastructure delivery plan

Communities Background Paper

### Context

- 8.1 This chapter considers social, community and leisure facilities that are not defined as Main Town Centre uses by the NPPF. These include provisions for sporting uses, including swimming pools, leisure centres and sporting venues, health centres and hospitals, educational establishments including nurseries and universities, meeting places, libraries and places of worship.
- 8.2 The policies in this chapter set out the approach to safeguarding and improving social, community and leisure premises and providing support for the development of new facilities where there are identified gaps in provision. The policies will support and facilitate the implementation of existing and future strategies for the provision and improvement of social community and leisure premises across Coventry.
- 8.3 The NPPF also promotes the creation of healthy communities and vibrant and viable town centres both of which help support local communities and provide a focal point for services over and above retailing facilities. The NPPF recognises that these two objectives can complement one another by providing for social, community and leisure uses within designated centres. The provision of such facilities can make significant contributions to the diversification of designated centres, helping to promote sustainable development and sustainable travel through the creation of linked trips and mixed use developments.
- 8.4 The Council will encourage applications that promote the re-use of existing facilities which support and enhance existing local communities, with a view to protecting those particular features of the neighbourhood valued by its residents.
- 8.5 It is also recognised that local shopping parades and public houses can play an important role in local communities. Shopping parades sit outside of the 'centres hierarchy' because of their small very localised scale. Public houses are classed by the NPPF as 'main town centre uses'. Yet both shopping

parades and public houses can, in some circumstances perform a broader function in serving a local community and, this needs to be recognised and planning judgement exercised on a case by case basis depending upon local context.

## **New or improved social and community premises**

- 8.6 In providing social, community and leisure services the NPPF requires local authorities to plan positively for the provision and use of shared spaces, community facilities (such as meeting and sports venues, cultural buildings and places of worship) and other local services to enhance the sustainability of communities and residential environments. In doing so Local Plans should guard against the unnecessary loss of valued facilities and services, allow established facilities to develop and modernise in a sustainable way and ensure that the location of housing, economic uses and community facilities and services are considered and promoted in an integrated way.
- 8.7 New cultural and community premises (as outlined below) will therefore be considered in accordance with the sequential approach set out in policy CO1. This is with a view to locating facilities in defined centres, making them easily accessible by foot, bicycle or public transport and fully accessible by all sections of the community and facilitating more integrated communities. They should be provided in buildings and facilities which are flexible and adaptable to communities' needs and sited to maximise the shared use of premises to facilitate their longevity.

## **Local Health Provisions**

- 8.8 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 expected to age, and as such it will be important to ensure new facilities are easily accessible to those who need them.

## **Cultural and Community Buildings**

- 8.9 Such facilities include sporting uses, including swimming pools, leisure centres and sporting venues, meeting places, libraries and places of worship.
- 8.10 The Council will seek to bring forward the recommendations of its Sports Strategy and its supporting documents to inspire more people to take up and regularly take part in sport; provide a range of high quality sporting opportunities; and to provide a range of modern, accessible and high quality sports facilities. The Council is also committed to maintaining a library provision

across the city as well managing an appropriate level of other community halls and buildings.

- 8.11 The provision of places of worship will need to be carefully considered having regard to the needs of local communities and faiths.

## **Universities, Schools and Educational Facilities**

- 8.12 Coventry's education offer is varied and successful, with a range of improving primary and secondary schools, supported by strong colleges and two of the countries most respected universities. In addition to a number of private institutions the city offers a range of State-funded schools including local authority maintained schools (community, foundation and voluntary aided and controlled schools).
- 8.13 In order to support sustainable development the Council recognises the importance of maintaining an adequate and appropriate supply of education provision. Opportunities should be taken to ensure schools are located in sustainable locations that complement neighbouring uses. They should be within easy access of local communities as well as offering opportunities to generate linked trips by being located close to other social and community provisions and local retail and service offers as well as being easily accessible by a range of transport options.
- 8.14 Where possible schools and their grounds should be utilised for other community provisions such as social, cultural, leisure and indoor sports facilities. This will help to develop a schools position at the centre of the community with significant benefits to local residents. It can also help ensure the effective use of resources and help minimise travel distances for users.
- 8.15 The Council will continue to work with both universities to enable on-going development of their masterplans. This collaborative working will help to facilitate future development proposals and ensure they are in harmony with the overall aims of regeneration, education and investment in Coventry and the sub-region.
- 8.16 To support compatibility with nearby uses community premises should be appropriate to their surroundings in terms of scale, character and mix of uses, and should not harm residential amenity, the environment, or result in adverse transport impacts in line with other relevant policies. Some facilities within residential neighbourhoods can have an impact on residential amenity which may need to be carefully managed. For example, the hours of operation will need to be balanced against the needs of service providers and users of the premises against impacts on neighbouring residents. Planning conditions will be used, as appropriate, to mitigate potential adverse amenity impacts.

- 8.17 Proposals should promote active frontages and encourage linked trips and shared services wherever possible. They should satisfy the above sequential approach in order to ensure that centres remain as the focus for not only retailing but also community uses, which ensures that the centre has a diverse mix of uses and addresses where appropriate any unmet local need. It will also be important to locate these provisions in the most sustainable places relevant to the proposed use to generate linked trips and promote sustainable communities.
- 8.18 It is recognised that there may be occasions where a proposal is not suitable for an in-centre use. This may be due to a number of factors including space requirements, neighbouring uses or local amenity. The Council will require evidence and justification for the reasons why centres have been discounted and why similar uses such as educational facilities, for example, cannot be located in the same locations.

### **Policy CO1: New or improved social, community and leisure premises**

1. Proposals for social, community and leisure facilities will be considered through the following sequential approach:
  - a. Designated centres to support the centres hierarchy;
  - b. Where no suitable sites are available in a designated centre, an edge-of-centre location;
  - c. Where no edge of centre sites are available, a site adjacent to other associated facilities including existing schools and educational facilities;
  - d. Only where no suitable site can be identified having regard to points 1-3, will stand alone sites be supported, subject to:
    - i. the proposal addressing an unmet need within a local community;
    - ii. there being no significant adverse impact upon the role of a defined Centre;
    - iii. there being no material impact on neighbouring amenity.
2. Proposals will be considered on the basis of:
  - a. The appropriateness of their proposed location in relation to their scale and intended catchment;
  - b. Compatibility with nearby uses;
  - c. Accessibility by a choice of means of transport;
  - d. Compatibility with other Plan Policies.

3. Where proposals are in accordance with the approved Masterplans for Coventry University or the University of Warwick they will normally be approved subject to high quality design proposals.

## **Re-use or Redevelopment of Facilities**

- 8.19 There may be circumstances where an existing facility ceases to operate and a site becomes vacant. Under such circumstances the first consideration will be whether there is still a local need for services currently or last provided on that site.
- 8.20 In order to demonstrate that there is no further need or demand for a building to support social, community or leisure use, applicants should undertake the following measures as a minimum:
- Where appropriate, seek confirmation in writing from the relevant agency that the proposed loss of premises is consistent with the agreed strategy for delivery of that service in the local community and city as a whole;
  - In accordance with Appendix 2 of the Local Plan, market the land or premises for D1 or D2 use continuously for a period of at least three months;
  - Close to the beginning of the marketing period, notify the Council of the proposed vacancy, so that community organisations, arts, sports and cultural groups seeking premises can be made aware of it.
- 8.21 Proposals involving the loss of land in use, or previously in use, by an education facility will only be supported, if it is clearly demonstrated to be surplus to educational requirements and its development for other uses would contribute to improvements in the delivery of school places in the city.
- 8.22 Where replacement facilities are intended, they should be located in accessible locations. The quality of new provision should be equivalent to or exceed what is being replaced.
- 8.23 Where premises have been registered with the Council as Assets of Community Value under the Localism Act 2011, this will be a material consideration in the determination of applications for change of use to non-community related use.

## **Policy CO2: Re-Use of or Redevelopment of Facilities**

1. Proposals for the re-use or redevelopment of community premises for a use outside the scope of this policy will not be supported if:
- a. There is an outstanding local need which could reasonably be met at that location;
  - b. The site remains viable for existing uses or could be made viable through appropriate diversification of use; and

- c. the proposal is not compatible with nearby uses.
- 2. In all cases consideration should be given to the suitability of the location for such facilities having regard to other Policies in this plan and its supporting documents
- 3. Where replacement facilities are intended, they should:
  - a. continue to serve the community;
  - b. be of appropriate scale and character;
  - c. be of high quality design.

## Neighbourhood and Community Planning

8.24 The Localism Act and NPPF provide the framework for Town or Parish Councils and defined neighbourhoods across Coventry to engage in community and neighbourhood planning. This can include a host of activity including Neighbourhood Plans, Parish Plans or other forms of design guidance etc. Where local neighbourhoods wish to engage in the development of local planning policy the Council will help support this process and work with communities to achieve their planning aims, where these are in conformity with the NPPF and the strategic policies of this Plan. Once adopted, a Neighbourhood Plan will form part of the statutory development plan and must be taken in to account in making planning decisions in that locality. Once proposed they will also be referred to within the Council's Local Development Scheme.

### Policy CO3: Neighbourhood and Community Planning

- 1. Where appropriate the Council will support communities in the preparation of:
  - a. Parish Plans;
  - b. Parish Design Statements, and;
  - c. Neighbourhood Plans.
- 2. When preparing these plans they must remain in accordance with national legislation, this Local Plan and any other city wide planning documents which support it.
- 3. Where appropriate the Council will support the application and designation of land or buildings as Assets of Community Value.
- 4. The Council will not support applications for Neighbourhood, Parish Plans or Assets of Community Value where they conflict with this Local Plan or supporting documentation.

## 9. Green Belt and Green Environment

### Key evidence

Coventry and Warwickshire Joint Green Belt Review (2015)

Coventry Green Belt Technical Update (2024)

Strategic Green Infrastructure Study (Coventry, Solihull & Warwickshire) (updated 2024)

Coventry Green Space Strategy (2010)

Coventry Urban Fringe Landscape Assessment & Guidance March 2007

Agricultural Land Classification (2024)

Green Belt and Green Environment Background Paper

### Green Belt

9.1 Green Belt policy is set out in the NPPF. Green Belt serves five purposes:

- a. to check the unrestricted sprawl of large built-up areas;
- b. to prevent neighbouring towns merging into one another;
- c. to assist in safeguarding the countryside from encroachment;
- d. to preserve the setting and special character of historic towns; and
- e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

9.2 National policy sets out stringent criteria for the assessment of proposals for development in the Green Belt to avoid inappropriate development causing harm to the five purposes set out above, not allowing development unless 'very special circumstances' can be demonstrated.

### STRATEGIC POLICY

#### Policy GB1: Green Belt

1. The city's Green Belt boundaries are identified on the Policies Map.
2. Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy.

## Safeguarded Land in the Green Belt

- 9.3 The NPPF sets the approach to defining the Green Belt boundaries. Its purpose is to help ensure that the Green Belt (as defined in this Plan) endures beyond the Plan period and that defensible boundaries are maintained.
- 9.4 Through the 2017 Local Plan the Council put a mechanism in place that responded to potential longer term development options in Warwick District meaning its own Plan remained flexible and was able to respond to emerging circumstances in neighbouring areas.
- 9.5 Land along the southern boundary of Coventry was therefore designated as safeguarded land for consideration as part of the 'next Local Plan review', i.e. the review now taking place. This safeguarding would have explicit regard to development proposals within Warwick District, that if brought forward for development over the course of this Plan period would create Green Belt policy 'islands' which would not meet the five test of Green Belt set out in the NPPF.
- 9.6 In this context, these sites were safeguarded as their long term designation as 'Green Belt' is dependent upon the development of adjoining land in a neighbouring local authority. The sites themselves are largely utilised for a small number of low density homes, education provisions or are undevelopable due to the presence of ancient woodlands.
- 9.7 The 2017 Coventry Local Plan stated that should such development proposals not materialise within Warwick District these sites would be considered for a formal return to the Green Belt due to the issues raised above.
- 9.8 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 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.

## STRATEGIC POLICY

### Policy GB2: Safeguarded Land in the Green Belt

1. The areas of Safeguarded Land proposed partly or wholly comprise the following sites and are shown on the Policies Map.
  - a. Land south of Westwood Heath Road;
  - b. Land south of Bishop Ullathorne School;
  - c. Playing Field south of Finham Park School; and

**d. Land west of Finham Primary School.**

Any development of these sites will be subject to 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.

## **Local Green Space**

- 9.9 The designation of land as Local Green Space is to protect green areas of particular importance to local communities. Local Green Spaces were formally designated through the 2017 Local Plan and are shown on the Policies Map. The NPPF states that Policies for managing development within a Local Green Space should be consistent with those for Green Belts. Green Belt policy is nationally set through the NPPF and will therefore be applied accordingly to Local Green Space designations.

## **STRATEGIC POLICY**

### **Policy GB3: Local Green Space**

1. The city's Local Green Space boundaries are identified on the Policies Map.
2. Inappropriate development will not be permitted unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, will be assessed in relation to the relevant national planning policy.

## **Green and Blue Environment**

- 9.10 For the purposes of this plan, the term 'Green Infrastructure' also includes what is sometimes called 'blue infrastructure', that is, various water bodies such as canals and rivers for example. A sustainable growth strategy relies on protecting and improving the quality of the environment. Future development must be located to maximise the efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned Green Infrastructure, so promoting sustainable development.
- 9.11 Natural England's [Green Infrastructure Framework](#) describes Green Infrastructure as generating multiple benefits for people and nature and creates greener, healthier places to live that supports a more productive economy. A Green Infrastructure network can include street trees, green roofs/walls, parks, private gardens, allotments, sustainable drainage systems, through to wildlife areas, woodlands, wetlands and natural flood management functioning at local and landscape scale. Linear Green Infrastructure includes roadside verges, green bridges, field margins, rights of way, access routes, and canals and rivers.

- 9.12 Improvements can be delivered as part of new development via the planning system, upgrading of existing, and delivering new Green Infrastructure in areas where provision is poor. In the Coventry context, enhancing and increasing green infrastructure is particularly important as some areas are particularly deficient.
- 9.13 High quality and well-connected green infrastructure has the potential to make Coventry a much more attractive and prosperous city, and a healthier place to live, work and enjoy, with multiple benefits for the economy, the environment and people. Local networks of high quality and well managed open spaces help to create urban environments that are attractive, clean and safe, and can play a major part in improving people's sense of wellbeing. In order to underpin the overall quality of life in all areas and support wider social and economic objectives, the development and maintenance, to a high standard, of a well-connected and multi-functional green infrastructure network, is essential.
- 9.14 Green infrastructure will also have an important role to play in helping the city adapt to climate change. This will include moderating urban temperatures, storing excess rainfall, increasing surface porosity to ease drainage, providing shade via tree canopies, and providing green oases in urban areas.
- 9.15 Green Infrastructure provision is currently informed by the City Council's [Green Space Strategy](#), and the [Open Space SPD](#) and at a sub regional scale by the Coventry, Solihull and Warwickshire Strategic Green Infrastructure Study.
- 9.16 In 2021, the Environment Act came into force requiring the development and implementation of Local Nature Recovery Strategies (LNRS), with the LNRS regulations following in April 2023. The boundary for the emerging [West Midlands LNRS](#) includes Coventry, Birmingham and the Black Country and this work is being led by the West Midlands Combined Authority (WMCA).
- 9.17 At the time of writing work is ongoing to prepare a Green and Blue Infrastructure Strategy and Action Plan for Coventry, in line with Natural England's [Green Infrastructure Framework](#) and this is at an early stage of preparation. Once adopted by the Council the new strategy, along with the aforementioned LNRS will become a material consideration in the decision-making process.

## STRATEGIC POLICY

### Policy GE1 Green and Blue Infrastructure

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.
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 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 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. This strategic network will be safeguarded and enhanced by:
  - a. Not permitting development that compromises its integrity and that of the overall green and blue infrastructure framework (including the Coventry/Oxford Canal);

- b. Using developer contributions to facilitate improvements to its quality, connectivity, multifunctionality and robustness;
- c. Investing in enhancement and restoration where opportunities exist, and the creation of new resources where possible, such as linking green and blue infrastructure to other forms of infrastructure;
- d. Improving its functionality, quality, connectivity and accessibility;
- e. Ensuring that a key aim of green and blue infrastructure is the maintenance and improvement and expansion of biodiversity;
- f. Integrating proposals to improve green and blue infrastructure in the delivery of new developments, particularly through area based regeneration initiatives and major proposals and schemes;
- g. Flood risk management and improving surface water quality, with preference being given to nature-based solutions where possible.

## Green Space

- 9.18 In order to address health inequalities and to promote healthier lifestyles, people need to have good access to a range of parks, open spaces, indoor and outdoor sports and recreational facilities. These spaces also add to the quality of the environment. This includes formal sports provision such as playing fields and play areas, as well as more informal areas of open space suitable for general relaxation, children's play, walking and cycling.
- 9.19 The Council has adopted a Green Space Strategy, which sets out minimum local standards for green space provision. It sets out the provision standards for the various categories of open space looking at quantity, quality and accessibility. There is also a set of quality standards for each of the provision standard categories. The same green space can sometimes contribute to more than one category in the standards. This will ultimately be superseded by the emerging Green and Blue Infrastructure Strategy and Action Plan for Coventry.

### Policy GE2: Green Space

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:
  - a. An assessment showing there is no longer a demand, or prospect of demand, for the recreational use of the site or any other green space use; or
  - b. A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards; or

- c. The loss resulting from any proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location of the city.
- 2. The loss of sports provision will be considered in line with the approach set out in the NPPF and the Councils most up to date evidence including the Playing Pitch and Outdoor Sports Strategy.
- 3. To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new sports pitches:
  - a. Land at Charter Avenue (former Alderman Harris School site).
  - b. Land east of Coundon Wedge Road.
- 4. Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

## **Biodiversity, geology and landscape**

- 9.20 Planning legislation places a biodiversity duty of care on all local and public authorities, emphasising that development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their area. These characteristics include the relevant biodiversity and geological resources of the area. In reviewing environmental characteristics, the Council will continue to assess the potential to sustain and enhance these resources.
- 9.21 Connectivity between sites and buildings, and resilient and robust ecosystems, which are adaptable to change, are essential to ensure retention of existing levels of biodiversity and to enable these to be enhanced wherever possible. As part of new development this could be achieved through well designed gardens, green roofs or landscape features. Resilient and functioning ecosystems support a range of human population needs, including flood management, control of atmospheric pollution, and access to green space.
- 9.22 In order to restore good levels of biodiversity across the Warwickshire, Coventry and Solihull sub-region, it is important to have urban areas that are permeable for wildlife, with havens for wildlife through the city and connected corridors linking sites. Green and blue infrastructure planning and implementation can contribute strongly to fulfilling this. Biodiversity will be promoted as a core component of sustainable development and landscapes for living, underpinning social, health, environmental and economic benefits, together with community well-being and local quality of life.

- 9.23 As set out in the text supporting Policy GE1, work is being undertaken to prepare a Local Nature Recovery Strategy, and more locally a Green and Blue Infrastructure strategy is to be prepared for Coventry.
- 9.24 [Biodiversity Net Gain](#) (BNG) became mandatory from 12<sup>th</sup> February 2024. The aim is that when developments are proposed, proposals ensure that habitats for wildlife are left in a measurably better state than they were before the development. Legislation requires that developers must deliver a BNG of 10%.
- 9.25 Through site selection and layout, developers should avoid or reduce any negative impact on biodiversity. They must deliver at least 10% BNG, as measured by the statutory biodiversity metric. There are 3 ways a developer can achieve BNG. They can create biodiversity on-site (within the red line boundary of a development site). If they cannot achieve all of their BNG on-site, they can deliver through a mixture of on-site and off-site. If neither can be achieved then as a last resort they can buy statutory biodiversity credits from the government. The steps must be followed in order. Further information can be found on the [government website](#), and local guidance is contained in the [Biodiversity SPD](#) which will be updated.

### **Policy GE3: Biodiversity, Geological, and Landscape Conservation**

1. Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity. Development proposals will be expected to ensure that they:
  - a. lead to a minimum 10% net gain of biodiversity, by means of an approved ecological assessment of existing site features and development impacts, and the creation or enhancement of habitats, urban greening features such as green walls and roofs, and/or the implementation of species specific features such as bird and bat boxes;
  - b. protect or enhance biodiversity assets and secure their long term management and maintenance;
  - c. avoid negative impacts on existing biodiversity;
  - d. preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans.

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.
3. Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, contributing to the delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan or its future equivalent. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan, will be protected and conserved through a buffer or movement to alternative habitat. Identified important landscape features, including Historic Environment assets, trees protected by preservation orders, individual and groups of ancient trees, ancient and newly-planted woodlands, ancient hedgerows and heritage assets of value to the locality, will be protected against loss or damage.

Further detail will be provided in an updated Biodiversity SPD. In the case of archaeological remains, all practical measures must be taken for their assessment and recording.

## Trees

- 9.26 Trees make a valuable contribution to the city's green landscape. New developments should seek to retain existing trees and other landscape features, incorporating them into a high quality design and landscape proposals where possible. Should loss be unavoidable, compensatory provision of new trees should be proposed as part of a well-designed landscape scheme or within other areas of green space within the local community. This will ideally be within 400m of the site to reflect the distance recommended within the Green Space Strategy. All replacement trees should also be of an appropriate type and status to reflect those which have been lost.
- 9.27 Trees that are already subject to protection either as part of an Ancient Woodland (as shown in Appendix 4) or through a Tree Preservation Order should be retained for the value they add to the visual amenity of the area, as such development proposals should retain protected trees.
- 9.28 In exceptional circumstances where the benefits of development are considered to outweigh the benefit of preserving protected trees, development will be permitted subject to adequate compensatory provision being made. This could take the form of replacement trees or a financial contribution equivalent to the value of the removed tree(s). Further details are provided in the [Trees and Developer Guidance SPD](#).

## **Policy GE4: Tree Protection**

- 1.** Development will be positively considered provided:
  - a.** there is no reasonably unavoidable loss of, or damage to, existing trees or woodlands during or as a result of development. Any proposed loss must be supported by a tree survey;
  - b.** trees not to be retained as a result of the development are replaced with new trees as part of a well designed landscape scheme; and
  - c.** existing trees worthy of retention are sympathetically incorporated into the overall design of the scheme including all necessary measures taken to ensure their continued protection and survival during construction.
  - d.** recommendations within the Coventry Trees and Development Guidelines SPD have been fully considered.
  - e.** proposals are in accordance with the requirements of planning national legislation
- 2.** Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.

# 10. Design

## Key evidence

Green Space Strategy (2019-2023)

Sustainable Urban Extensions Design Guidance SPD

Householder Design Guide SPD

New Residential Development Design Guide SPD

Tall Buildings Design Guide and View Management Framework SPD

Design Guidance on Shopfronts for Conservation Areas and Historic Buildings

Design Background Paper

## Context

- 10.1 The city's built and natural environments reflect the public realm or public face of Coventry. They are integral in creating a positive image and help create a sense of place, shaping cultural identities and helping to instil civic pride. They play an important part in improving the health and wellbeing of the population and can help mitigate the impacts of climate change. Furthermore they can play an important role in helping to attract investment, visitors and encourage tourism.
- 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-social behaviour and crime including the perception and fear of crime for all in the community. Furthermore, creating routes and spaces that are green, through the use of trees, living walls, green roofs and other types of green infrastructure, will not only enhance the quality and attractiveness of the city but will also contribute to ecological diversity.
- 10.3 The Council wants to significantly raise the standard of design in the built and green environments as good design assists in the creation of sustainable and inclusive communities and can improve the quality of people's lives. Furthermore, good design can help to reduce some of the environmental inequalities between the more deprived neighbourhoods and the rest of the city.
- 10.4 This Local Plan will ensure that development follows an effective design process, which assesses the physical, social and economic context, evaluates options and involves affected groups of people.
- 10.5 Opportunities to reflect existing materials and characteristics as part of new developments should be the starting point of any design proposals. Where there is no established character, or the character is poor quality there will be a clear and justifiable need to bring about improvements and enhancement to the

existing built and natural environment. As such, proposals which demonstrate high quality design; reflect the requirements of policy DE1 and would reflect a significant enhancement of the built environment may be considered acceptable even where they divert from current characteristics.

- 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 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. Applications for development which affect higher risk buildings or spaces such as those that could attract crowds of people, should always fully consider the advice provided by National Counter Terrorism Security Office (NaCTSO) or future equivalent.
- 10.7 To support the importance of promoting high quality design across Coventry a series of [design SPDs](#) have been adopted and a series of design codes will be developed to guide high quality and contextually responsive design across the City.

## STRATEGIC POLICY

### Policy DE1 Ensuring High Quality Design

1. All development proposals should follow a design-led approach to deliver sustainable, high quality placemaking. Development should contribute positively to the wellbeing of existing and new communities, the quality of the surrounding built and natural environment, and should be planned and designed with reference to the climate change strategy and the adaptation and resilience strategy.
2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.
3. Where buildings in excess of 20m in height are proposed, these must be informed by the guidance of the Tall Buildings SPD.
4. In and around the City Centre, the location of proposed development must be considered in relation to the identified views of the City's three spires, and the tall buildings design guide and view management framework SPD.
5. All development will be expected to meet the following key principles:
  - a. respond to the physical context of the site;

- 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;
- c. where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;
- d. preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;
- e. preserve or enhance the character and setting of major road, rail and canal corridors;
- f. clearly define the boundaries between public and private spaces and enclosure of space;
- 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;
- i. make places that inter-connect and are easy to move through;
- j. ensure places are easily understood by users, with clear routes and distinct physical features;
- k. seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;
- l. be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;
- m. promote diverse, viable places;
- 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);
- p. support the integration of through routes for public transport and incorporate suitable bus priority measures 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.

- t. Ensure that car parking is integrated into the development in a convenient, accessible manner and does not dominate the development and its surroundings or cause safety issues;
  - u. Provide safe, secure, convenient and accessible provision for cycle parking and storage, facilities for waste management, recycling and collection in a manner that is appropriately integrated within the overall development;
6. Development located in areas covered by Coventry City Council Design Codes, must demonstrate compliance with the Design Codes key principles.
  7. Outline major applications located in areas not subject to a Coventry City Council Design Codes, will be required to submit a Design Code to assess compatibility with local context.

- 10.8 The public realm is essentially the network of routes and spaces that connect the city together. They are like the arteries of the city and the better they operate the better the city functions. These routes and spaces are usually but not always fronted or bounded by development, and they contribute to the city in different ways. Whatever the type of route they all need to be designed to ensure they are safe for all users, attractive, accessible and pleasant to use. Through-city and city-wide routes are very important at conveying the image of the city to those merely passing through and creating good first impressions of the city to vehicle-borne visitors alike. Whilst local and neighbourhood routes are fundamental in ensuring that the city is a pleasant and attractive place to live and work.
- 10.9 Coventry has a strong legacy of public art, particularly from the post war period where public art formed an integral part of the redevelopment of the city. It is an important element in defining the character and identity of the city centre, be it landmark pieces such as the Whittle Arches or small more intimate pieces such as the Niad or historically important pieces such as the Coventry tapestry located in St Mary's Guildhall.
- 10.10 To build on this legacy, public art will be encouraged to be incorporated into buildings and public spaces. Furthermore, public art will be encouraged along transport corridors, gateways and pedestrian and transport nodes.
- 10.11 Wherever possible, development proposals should look to incorporate existing landscape features – landform, trees, hedges, water bodies etc. These should be used to inform and guide how a development is designed and they should be incorporated in a way that ensures they will contribute positively to the development and surrounding area.
- 10.12 Like the routes and spaces, the buildings that front them must positively contribute to the built environment. They need to be designed to enhance their

immediate location and the city as a whole. They should be energy efficient and incorporate sustainable technologies to help combat climate change. They should also be designed to be safe and easy to use by all members of the community, including people with restricted mobility.

- 10.13 Design proposals relating to landscaping, public realm and green spaces should also be prepared in accordance with the Green Environment and Environmental Management policies of this plan. Any sites brought forward within or immediately adjacent to a Conservation Area or which has an impact on the setting of a listed building should also be considered in accordance with the heritage policies of this plan.
- 10.14 Good design also includes careful consideration of the physical process of redevelopment and ensuring that steps are taken to mitigate any negative impacts during the process of redevelopment. The City Council therefore expect that where site hoarding is required these are of high quality and informed by local context, whilst opportunities for meanwhile uses to be accommodated on sites should also be explored to retain vibrancy and activity within areas of redevelopment.
- 10.15 High quality design also requires understanding of a sites context and the wider role in local townscape, this is particularly of importance where development sites are located in areas of mixed urban character and typology, Sites brought forward for redevelopment should therefore demonstrate how they have been informed by local character and an understanding of how the site contributes toward the wider townscape.

## **DE2: Delivering High Quality Places**

### **1. Public Realm**

- a. Where relevant, all development proposals will be required to integrate high quality soft and hard landscape designs.
- b. The palette of materials and street furniture for any development proposal will need to respect the prevailing character of its respective area or adjoining landscape.

### **2. Public Art**

- a. Public art should, where appropriate, form an integral part of the design process of development proposals.
- b. As an alternative to stand-alone pieces of public art, opportunities should be taken to incorporate this into the design of the buildings e.g. through the use of artist/architectural glass or ironmongery etc. thus giving it more legitimacy and integrity.

- c. Established public art shall be retained within redevelopment proposals unless the benefits of its removal outweigh the harm of its loss. Where public art is lost replacement works shall be incorporated into new development unless robust justification is provided highlighting that this it is not viable.
- d. Where public art is provided, contributions and commuted maintenance sums for up to 10 years will be required and include the cost of decommissioning where appropriate.

### **3. Lighting**

- a. Lighting should be carefully considered in order to meet the requirements of creating attractive and safe environments for all, whilst also mitigating impacts upon neighbours and ensuring that lighting does not adversely affect biodiversity.
- b. Carefully considered architectural lighting proposals for new buildings and refurbishment of existing buildings will be encouraged to enhance the overall appearance of the city during the hours of darkness.

### **4. Designing for Healthy Communities**

Major development proposals must fully consider how physical and mental health and well-being for people of all abilities and ages has been considered and catered for. For residential developments of 10 units and above, proposals should include access to high quality open space and nature, the provision of attractive walking and cycling routes, play facilities, seating, and spaces for all mobility's to interact, with well-connected permeable layouts that incorporate desire lines.

### **5. Meanwhile Uses**

- a. Vacant plots/sites planned for redevelopment must investigate provision of meanwhile/temporary uses prior to commencement of any redevelopment work. Any meanwhile/temporary use of such sites will be appropriate where:
  - i. the meanwhile/temporary use does not preclude permanent use of the site, particularly through the length of any temporary permission;
  - ii. the proposed meanwhile/temporary use contributes to the function of the area where it is located or meets a specific need identified by the Council;
  - iii. potential adverse amenity impacts are prevented or mitigated; and
  - iv. the proposed use meets all other Local Plan policies relevant to the use.
- b. Site hoardings must be of high quality and responsive to their context.

- c. The use of high-quality accessible landscape areas will be welcomed for plots which may remain vacant for periods greater than 6 months.

## **6. City Centre and Transition Zone**

- a. In line with other plan policies, proposals located within the City Centre Transition Zone\*, should fully consider their local context and the sites role in transitions to the City Centre context.
- b. Proposals within the defined City centre\*\* and the City Centre Transition Area\* should demonstrate how they contribute to the key aims and objectives of Coventry City Council.

\*City Centre Transition Zone as shown at Appendix 9(d)

\*\*City Centre boundary as shown at Appendix 9(d)

# 11. Heritage

## Key evidence

The Coventry Historic Environment Record (HER)

The National Heritage List for England

The Coventry Local List of Buildings of Historic and Architectural Interest

Coventry Heritage at Risk Register

The Gould Report on the 20th Century City Centre (2009)

The Coventry Historic Landscape Characterisation (2013)

Spon End and Nauls Mill Area of Local Distinctiveness (2003)

Conservation Area Appraisals and Management Plans

Design Guidelines for Development in Coventry's Ancient Arden (1995)

Design Guidance on Shop fronts for Conservation Areas and Historic Buildings (2014)

Heritage Background Paper

## Context

- 11.1 Coventry has a rich and diverse historic environment which is evident in the survival of individual historic assets and in the local character and distinctiveness of the broader landscape. Prehistoric flint tools which have been collected from fields around the city demonstrate that there has been human activity in the Coventry area since at least the Mesolithic period, some 10,000 years ago.
- 11.2 The landscapes and buildings that can be seen today predominantly date from the medieval period onwards when Coventry grew from a small Saxon settlement to become one of the principal cities of medieval England. The wealth of the medieval city peaked in the 15th century and was followed by a slow economic decline that saw Coventry stagnate until a second period of dramatic expansion occurred in the late 19th century with the emergence of industries such as ribbon weaving and watch making. Twentieth century Coventry became a major centre for manufacturing and the city grew rapidly with factories and housing expanding over the previously rural landscape absorbing many of the surrounding villages and farms. The concentration of industry in Coventry resulted in it suffering from extensive bombing during World War II, causing significant damage to the fabric of the city. However the wartime destruction was followed by an era of extensive reconstruction with innovative architecture and design in the 1950s and 60s.

## Conservation Areas

- 11.3 Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on local planning authorities to designate as Conservation Areas any 'areas of special architectural or historic interest the character and appearance of which it is desirable to conserve or enhance'. The Act also requires local planning authorities to review their Conservation Areas from time to time and designate extra areas where appropriate. Appraisals and Management Plans need to be produced for all Conservation Areas. Therefore, areas of the city considered to have special architectural or historic interest or where the character and appearance of an area is of a desirable status to conserve or enhance, will be continually reviewed over the plan period to identify if further areas of the city may warrant conservation area designation in compliance with the approach set out in national policy.

### STRATEGIC POLICY

#### Policy HE1 Conservation Areas

1. The areas listed below have been designated as Conservation Areas under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and are detailed on the Policies Map:
  - a. Allesley
  - b. Chapelfields
  - c. Coventry Canal
  - d. Far Gosford Street
  - e. Greyfriars Green
  - f. Hawkesbury Junction
  - g. High Street
  - h. Hill Top
  - i. Ivy Farm Lane
  - j. Kenilworth Road
  - k. Lady Herbert's Garden and The Burges
  - l. London Road
  - m. Naul's Mill
  - n. Spon End
  - o. Spon Street

p. Stoke Green

q. Earlsdon

r. Brownhill Green

2. Conservation Area Appraisals and Management Plans will be produced for all of the Conservation Areas to guide their preservation and enhancement. All development proposals within Conservation Areas will be determined in accordance with this Plan and the appropriate Appraisal and Management Plan.

## Conservation and Heritage Assets

- 11.4 Coventry has over 400 Listed Buildings ranging from the medieval St Mary's Guild Hall to the 1962 railway station that have been selected by the Government as being of national importance. In addition over 280 buildings have been selected by the Council for Local Listing due to their importance to Coventry. The city also has 18 Conservation Areas (, 20 Scheduled Monuments, 4 Registered Parks and Gardens and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record.
- 11.5 Where it is considered necessary, the Council may propose buildings for Listing by national government and will also continue to enhance and maintain an up-to-date Coventry Local List of buildings of historic and architectural interest.
- 11.6 Where heritage assets are present on sites allocated for housing in Policy H2, the Council will seek to secure their retention and conservation through legal agreements.
- 11.7 In addition to the national Historic England Heritage at Risk Register the Council will maintain the Coventry Heritage at Risk Register and work with property owners and developers to reduce the number of heritage assets in Coventry that are deemed to be at risk. The Council will use its statutory powers where necessary to secure the preservation of listed buildings with Urgent Works and Repairs Notices. To reflect their historic importance, scale and strategic proximity to the city centre, the sites of Charterhouse and the London Road cemetery are to be designated as a Heritage Park. This is considered further in Policy HE3.
- 11.8 The Council will continue to maintain an up-to-date and accessible Historic Environment Record as the principal evidence base on the city's Historic Environment. Historic Landscape Characterisation and the Arden Design Guidance will be used to inform decisions on historic character and local distinctiveness.

## **STRATEGIC POLICY**

### **Policy HE2: Conservation and Heritage Assets**

- 1.** In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance. These Heritage Assets include:
  - a.** Listed Buildings and Locally Listed buildings;
  - b.** Conservation Areas;
  - c.** Scheduled Ancient Monuments and Archaeological sites;
  - d.** Registered Parks and Gardens; and
  - e.** Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's heritage and are positively identified on the Coventry Historic Environment Record.
- 2.** Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance using currently available evidence.
- 3.** Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail.
- 4.** The sympathetic and creative re-use of heritage assets will be encouraged, especially for heritage that is considered to be at risk, so long as it is not damaging to the significance of the heritage asset. The embodied energy present in historic buildings contributes to sustainability.
- 5.** The Council will use its statutory powers to secure the preservation of buildings and other heritage assets that are deemed to be at risk by the national and local heritage at risk registers.
- 6.** Demolition or destruction of heritage assets will be resisted; proposals to demolish a heritage asset will therefore need substantial justification. The greater the damage to the significance of the asset, the greater the justification required and the public benefit needed to outweigh such damage.
- 7.** All proposals should aim to sustain and reinforce the special character and conserve the following distinctive historic elements of Coventry:
  - a.** The surviving buildings, defences and street plan of the medieval city centre and its suburbs;

- b. The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Brownhill Green, Coundon Green, Little Heath (Spring Road), Stivichall Croft and Lower Eastern Green (at Dial House Lane);
  - c. The wider Arden rural environment on the fringe of the city comprising field-systems, ancient woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings;
  - d. Buildings associated with the city's industrial heritage; ribbon weaving, watch making, cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways;
  - e. The Victorian and Edwardian suburbs such as Earlsdon and Stoke;
  - f. Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks;
  - g. The significant elements of Coventry's ground-breaking post-war reconstruction including its plan, built form, public art works and public spaces; and
  - h. The city centre primary shopping area, respecting the architectural design principles of the significant elements of the post- World War II reconstruction such as Broadgate and the shopping Precincts.
8. Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.
9. For development in relation to heritage assets and / or in conservation areas, these should demonstrate how the relevant Historic England Good Practice Guidance has been taken into account.
10. In exceptional cases, where harm cannot be outweighed by public benefit and where proposals produce harm to the setting of heritage assets which cannot be mitigated, the Council may seek contributions from developers for the enhancement, repair and/or maintenance of the impacted historic assets.

## Heritage Park Charterhouse

- 11.9 Through the Local Plan and partnership working, the Council are maintaining and further promoting the creation of a City Heritage Park in the Sherbourne Valley and the grounds of the Charterhouse and London Road Cemetery. The designation reflects the historic significance of the two sites as well as their

scale and strategic proximity to the city centre. There is also wider connectivity opportunities associated with the River Sherbourne. Proposals which positively contribute to the park will be supported, along with measures to improve linkages to the area and improve accessibility between the city centre and the Charterhouse grounds. These may include a riverside walkway along the exposed section of the River Sherbourne, connecting Far Gosford Street with Charterhouse along the west side of the river crossing Gulson Road and Humber Avenue, alongside a footpath and cycle route along the former Coventry loop line railway and a new pedestrian crossing on the London Road. These enhancements, in connectivity and green infrastructure, could facilitate comprehensive regeneration opportunities of brownfield land along the River Sherbourne, most notably between Gulson Road and Gosford Street and in Harper Road that will complement this part of the city. The City Heritage Park and its key routes and linkages are identified on the inset map at Appendix 5. The wider area will be supported by a Masterplan.

- 11.10 In addition, opportunities should be taken to improve the setting of the Charterhouse, the naturalisation of the river valley and the views through to the viaduct
- 11.11 These areas should then be proactively re-naturalised or appropriately landscaped, adding to the Heritage Park where appropriate and further improving the quality of environment within the Local Green Space designation to the West of the River. The Local Green Space should be supported by defensible boundary lines created as part of the Master planning process and brought forward in partnership working.

### **Policy HE3 Heritage Park – Charterhouse**

- 1. Proposals which support the City Heritage Park in the grounds of the Charterhouse and London Road cemetery will be supported along with measures to improve linkages to the area along the River Sherbourne (between Charterhouse and Far Gosford Street), the former Coventry loop railway line and across the London Road. Proposals that are detrimental to the heritage park and the improvement of linkages will be resisted.
- 2. The Heritage Park and any expansion of Blue Coat School should be guided by a comprehensive Master plan, which reflects the policies of this Plan (including Appendices).

### **Archaeology**

- 11.12 In order to be responsive to the historic character and local distinctiveness, proposals which are inclusive of intrusive groundworks are expected to

conserve and, where appropriate, enhance archaeological features across the City.

11.13 Archaeological assets which must be carefully considered include:

- Scheduled Monuments
- Known archaeological sites
- Areas of Archaeological Constraint
- Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's archaeological heritage and positively identified on the Coventry Historic Environment Record
- Prehistoric human habitation to the modern period.

11.14 In considering proposals for development, the City Council the validation checklist will set out what is will usually be required including:

- a) an initial assessment establishing the archaeological significance of the site to be submitted as part of any planning application.
- b) where appropriate an archaeological evaluation and subsequent publication of results to be carried out prior to commencement, where, as a result of the initial assessment, important archaeological remains are likely to be present.
- c) preservation in situ to be the preferred approach
- d) justification together with appropriate mitigation before allowing any harm to, or loss of, the significance of a heritage asset.

## **Policy HE4 Archaeology**

1. In order to be responsive to the historic character and local distinctiveness, proposals which are inclusive of intrusive groundworks are expected to conserve and, where appropriate, enhance archaeological features across the City.
2. Where material change to an archaeological asset has been agreed, recording and interpretation must be undertaken to document the asset's historic significance and advance understanding of the asset to be lost. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.
3. Archaeological investigations must be undertaken where development is proposed on or adjacent to the line of the former site of the City Wall. Positive weight will be given to schemes which incorporate design responses to reflect and respond to the line of the medieval City Wall.
4. New development which include or take place adjacent to the remaining above ground sections of the medieval City Wall, must enhance the setting of the wall and seek to incorporate it into design.

5. In cases where loss cannot be avoided, the Council may seek contributions from developers for the enhancement, repair and/or maintenance of archaeological assets in the vicinity of the propos

## 12. Accessibility

### Key evidence

Coventry Transport Strategy (2022 – 2037)

Transport Background Paper 2024

Coventry Area Strategic Model (CASM) 2024

Coventry Local Air Quality Action Plan

Coventry Connected SPD

### Context

- 12.1 The transport background paper sets out the context and linkages to a range of local, regional and national strategies and action plans.
- 12.2 In addition to enabling everyday activities such as accessing work, education, shops and leisure facilities, transport can also have a significant influence on peoples' health and wellbeing and overall quality of life. Transport is also an enabler of economic activity, providing connections between people and jobs, access to markets and business supply chains.
- 12.3 Individual transport needs can vary significantly. It is therefore important to ensure that everyone who lives in, works in or visits the city is able to access a choice of accessible and high quality transport modes and make well informed and appropriate decisions about how and when they travel.
- 12.4 Coventry's existing transport network generally works effectively, however there are a number of important wider challenges to address:
  - The dominance of the car in the context of a compact growing city with a high proportion of short local car trips which discourages physical activity, thus promoting less healthy lifestyles.
  - Relatively low levels of cycling, and to a lesser extent walking and public transport usage for local trips, especially for trips to school and work.
  - Low levels of accessibility and a high reliance on access by car to some edge of city employment and retail sites.
  - Road congestion on some major road corridors, primarily during peak periods, which can negatively affect economic growth and air quality.

- The impact of the car in the street environment such as obstructive on-street parking, road safety and general street clutter.
- Working towards achieving current road casualty reduction targets and making our roads safer for all.
- The need for improved strategic connectivity to surrounding areas which are economically linked to Coventry.

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 (NO<sub>2</sub>) 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 NO<sub>2</sub> standard. Noise is another issue which impacts upon health, as set out in the environmental Management chapter of this plan but which is also cross referenced here.

12.6 The development and expansion of the city provides an opportunity to address these issues through investment in the existing transport network, and by ensuring that new developments cater for the accessibility needs of a diverse, forward looking low carbon city. This includes opportunities for the promotion of intelligent mobility and more active and environmentally sustainable modes of travel such as walking and cycling, public transport and ultra-low emission vehicles such as electric cars. Well linked and attractively designed, connected, safe and accessible green and blue infrastructure routes can play a key role in encouraging active lifestyles by walking, by mobility aids such as wheelchairs and by cycling for example.

12.7 There are already a number of positive initiatives taking place including a successful programme of investment in transport networks across the city. This includes a successful programme of public realm enhancements in the city centre, targeted investment to address congestion along a series of busy road corridors and the delivery of a substantial programme of cycle routes.

12.8 The need to enhance accessibility within the city is underpinned by a wider objective to strengthen accessibility across Coventry and Warwickshire and with neighbouring areas in the East and West Midlands. This approach recognises the established economic travel to work area and reinforces opportunities to enhance business connectivity and supply chains.

## **Accessible Transport Network**

12.9 In order to create a prosperous and attractive city, local people must have good access to the jobs and services they need. This can only be achieved if the transport network offers a wide choice of convenient, affordable, accessible and

reliable transport modes which meet the needs of the varying types of trips which people need to make.

12.10 The principles adopted in this reviewed development plan promote the utilisation of accessible brownfield sites with additional housing being met through the development of Sustainable Urban Extensions (the SUEs were allocated in the adopted 2017 plan and these are now underway).

12.11 The use of brownfield sites will:

- Make sustainable travel options, such as walking and cycling more attractive options for local trips;
- Help to focus development towards accessible locations making it easier for local people to access employment, education and skills, shops and leisure facilities and reduce the distance people need to travel;
- Support higher density development proposals which will help support the viability of public transport services

## **STRATEGIC POLICY**

### **Policy AC1: Accessible Transport Network**

1. The Council will encourage proposals that minimise the need to travel, maximise trips made by sustainable transport modes, incorporate liveable neighbourhood principles and reduce the dependence on the private car in accordance with the National Design Guide, National Model Design Code, Transport for West Midlands (TfWM) Local Transport Plan (LTP) and the Council's Transport Strategy and Coventry Connected SPD.
2. Sustainable transport modes should be fully integrated into the design and placemaking of developments to ensure sustainable and active travel is a real and long term alternative. As a result, proposals will be supported where:
  - a. The proportion of trips made by walking, cycling and public transport is high, and local connections by these modes are improved;
  - b. Car dominance is reduced;
  - c. Streets and the public realm are made safer, more accessible and where the quality and resilience are improved such as through materials and increasing biodiversity; and
  - d. Air quality, noise, and green and blue infrastructure are improved to create more attractive neighbourhoods for people.
3. Development proposals which are expected to generate additional trips on the transport network should:

- a. Integrate with existing transport networks including roads, public transport and walking and cycling routes through safe, accessible and sustainable links to promote access by a choice of transport modes.
  - b. Consider the transport and accessibility needs of everyone living, working or visiting the city. Special attention should be paid to the needs of disabled people, young children, and people with special needs. Special attention should be paid to the needs of an aging population to make Coventry an Age Friendly City.
4. Support the delivery of liveable neighbourhoods and new and improved high quality local transport networks which are closely integrated into the built form. This includes networks which support access to strategic growth corridors. The scale of measures required should be appropriate to the scale and impact of the proposed development.
5. Where appropriate, support the provision and integration of emerging and future intelligent mobility infrastructure, including Very Light Rail, Demand Responsive Transport, micro-mobility, Connected Autonomous Vehicles (driverless cars), autonomous delivery and drone technology.

## Road network

- 12.12 Coventry is well connected to the national road network having good access to the A46/M40, M69, M6, M45/M1 and M42. Highways England manage the strategic road network which surrounds Coventry and is crucial to its national connectivity needs. This includes the A46 corridor which has been designated as an Expressway in the Highways England Road Investment Strategy. This busy corridor is already benefitting from major investment at Tollbar Island to introduce a grade separated underpass. Further improvements are planned at Brandon Road and Walsgrave near the B4082 to introduce grade separation to improve traffic flow. Further enhancements are likely to be necessary within the plan period, such as the A46/ Stoneleigh Road junction located in Warwickshire, which supports access to several major employment sites within Coventry including the University of Warwick and Westwood Business Park. Future capacity enhancements on the strategic highway network which support Coventry's economic growth proposals will be supported.
- 12.13 Coventry's well maintained and managed local highway network is considered to be an asset for the city which should be protected. The historic evolution of the city has left a legacy of a concentric web of radial roads enabling direct linkages between the strategic road network and the Coventry ring road. Recent improvements to the road network as part of a major Pinch Point programme has helped to address local congestion hotspots and improve traffic flows, most notably on the A45 and A4600 corridors.

12.14 The Key Route Network is made up of main metropolitan roads - operating at agreed performance standards. This network will serve the main strategic demand flows of people and freight across the metropolitan area, and provide connections to the national strategic road network. It will also serve large local flows which use main roads and provide good access for businesses reliant on road based transport and will use highway capacity effectively to cater for movement by rapid transit and core bus routes, cyclists, Heavy/Light Goods vehicles and private cars to support growth on key corridors.

## **STRATEGIC POLICY**

### **Policy AC2: Road Network**

1. New development proposals which are predicted to have a negative impact on the capacity and/or safety of the highway network should:
  - a. Mitigate and manage the traffic growth which they are predicted to generate to ensure that they do not cause unacceptable levels of traffic congestion, highway safety problems and poor air quality. Highway mitigation and management measures should focus firstly on demand management measures (Policy AC3) including the promotion of sustainable modes of travel, and secondly on the delivery of appropriate highway capacity interventions. Highway capacity interventions should be appropriate to the scale of development and expected impact and will be determined through the associated Transport Assessment.
  - b. Developments should seek to support and accommodate, where appropriate, measures which facilitate enhancements to the wider transport network including those set out in the Infrastructure Delivery Plan. Be served by routes which are suitable for that purpose. Where this is not achievable, proposals will only be considered acceptable if appropriate interventions can be applied to suitably mitigate any negative impacts, including the construction of new access link roads.
2. Development will be expected to actively support the provision and integration of intelligent mobility infrastructure, such as electric vehicle charging points and include rapid charging points, car club schemes and bicycle hire infrastructure. These should be provided onsite unless justification shows that off site is the only feasible option.
3. New development proposals that require changes to the highway network will be required to positively integrate with and have consideration of the movement of people and goods on the existing road network, including walking, cycling and rapid transit routes in accordance with Policy AC4 and AC5.

4. Proposals should not negatively impact road safety and should be in line with the Council's Transport Strategy.
5. The Infrastructure Delivery Plan sets out specific measures and funding sources for the transport network improvements which are required to support the delivery of the Local Plan. The Council may seek to secure the provision of transportation infrastructure through planning conditions and legal agreements.
6. Further guidance will be contained in the Coventry Connected SPD and the emerging Transport Design Guide.

## Demand management

- 12.15 Highway resilience and journey time reliability are essential to supporting the needs of local businesses and the economic prosperity of the city. Coventry's existing highway network generally copes well with traffic incidents and peak flows; however congestion still exists in some areas during the peak period.
- 12.16 Evidence shows that a large proportion of existing peak car traffic consists of trips which start and finish within the city and are over relatively short distances, often less than two miles. As a priority, sustainable modes of travel will be promoted to reduce single occupancy car use for short journeys. However, it is recognised that as the city grows and the population and the number of jobs increase, other demand management measures will become increasingly important to maintain the integrity of the network.
- 12.17 The primary tools to achieve this are:
- Transport Assessments;
  - Travel Plans;
  - Car parking standards; and
  - Urban Traffic Management and Control.
- 12.18 **Transport Assessments** - New developments will need to be considered on a case by case basis to determine the accessibility requirements by all transport modes, the anticipated levels of traffic generated and the impact this would have on the highway network. Transport Assessments will be required for larger developments which create significant additional trips on the network, and will be used to determine the severity of the impact, including congestion and road safety, and the appropriate type and level of mitigation required.
- 12.19 **Travel Plans** - Travel Plans play an essential role in encouraging sustainable transport and flexible and agile working practices to support the management and generation of traffic associated with trip attractors such as local businesses, schools, universities, hospitals, railway stations and new residential developments. They are the first step in mitigating transport related issues before implementing physical road infrastructure measures.

12.20 Travel Plan support can be provided by the Council and TfWM on the cheapest and most sustainable ways to travel including journey planning, ticket advice and any travel support.

12.21 Travel Plans should be updated regularly and monitored to maximise their effectiveness against agreed objectives and targets. Where applicable, these should be closely linked to Transport Assessments to act as a monitoring tool and action plan.

12.22 **Car Parking** – The provision of car parking can influence:

- The generation of traffic and the potential for congestion.
- Occurrences of inappropriate on-street parking which can:
- Block access routes for emergency, refuse and delivery vehicles;
- Block footways preventing access for pedestrians;
- Impact negatively on the street scene; and
- Reduce visibility for all users at junctions causing safety issues.
- The ability to encourage sustainable transport modes.
- The visual impact of car parking on the built environment

12.23 New developments will therefore be expected to provide appropriate levels of car parking in order to address these issues. Local car parking standards are set out in appendix 6 of the Local Plan. They have been developed based on NPPF criteria, locally determined accessibility criteria and benchmarking of other Local Authorities.

12.24 Detailed standards have been developed for areas outside of the city centre including car parking standards for new residential and business development. The provision of car parking in the city centre will be determined on a site-by-site basis. The objective of this approach is to discourage the excessive provision of private car parking in the city centre because:

1. Adequate levels of publicly available car parking are already provided across the city centre.
2. The city centre is highly accessible compared to other parts of the city, so can be easily accessed by more sustainable non-car modes of transport.
3. Development in the city centre is proposed to be of a much higher density; but this would not be achievable if high levels of private parking are provided.

12.25 The car parking standards also include requirements for the provision of electric car charging and cycle parking infrastructure.

12.26 Developments which result in changes to the location or supply of publicly available car parking in the city centre the policy sets out the requirements and justifications necessary to ensure that a consistent and appropriate

supply of public parking is maintained to support new development proposals without having an unsustainable oversupply. This includes proposals to replace some existing surface level car parks with multi-storey car parking.

12.27 Proposals will be required to encourage and incentivise sustainable travel such as through the provision of mobility credits.

12.28 Urban Traffic Management Control (UTMC) - The on-going development of the UTMC system combined with the application of Intelligent Transport System (ITS) technologies will continue to be used to manage traffic on the highway network. Any new traffic control infrastructure required to support new developments must be compatible with, and where appropriate, link into the established UTMC network.

### **Policy AC3: Demand Management**

1. Transport Assessments will be required for developments which generate significant additional trips on the transport network. Thresholds for their requirement will be based on locally determined criteria set out in the Coventry Connected SPD.
2. Travel Plans will be required for new developments which generate significant additional traffic movements. Detailed guidance on the requirement for Travel Plans will be set out in the Coventry Connected SPD.
3. Proposals for the provision of car parking associated with new development will be assessed on the basis of parking standards set out in Appendix 6, with active and sustainable travel modes factored into the delivery of any new parking provision.
4. Development proposals which result in significant changes to the location or supply of public car parking spaces will be required to address any associated necessary changes to associated car park signing and management systems. In regard to development proposals in the city centre:
  - this should include clear justification as part of an on-going strategic review process and shown to have an acceptable impact on the performance and accessibility of the city centre and overall car parking provision.
  - The redevelopment and improvement of surface level car parks will be prioritised.
  - The provision of new surface level car parking will not be supported within the city centre unless its provision is to support the implementation of longer term regeneration schemes. In such cases surface level provision will only be allowed on a temporary basis.
  - New car parking should be accommodated in a multi-storey format.

- Proposals for multi storey car parks should respect the character and scale of the surrounding environment and maximise opportunities for high quality aesthetics.
  - Parking needs and the role of the car will also be balanced with promoting the use of public transport, cycling and walking.
5. Proposal will be required to encourage and incentivise sustainable travel, such as through the provision of Mobility Credits.
  6. New development proposals which require changes to the highway network will be required to integrate with any existing Urban Traffic Management Control (UTMC) and Intelligent Transport Systems (ITS) infrastructure and strategy and development of the Key Route Network.
  7. Further guidance will be contained in an updated Coventry Connected SPD.

## **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. Perhaps the most significant advantages which are offered by these active travel modes are the physical and mental health benefits. Regular counts of private and public transport trips into the centre of Coventry show that between 2011 and 2021 light vehicles (including cars and taxis) consistently accounted for around 75%-80% of trips. Levels of cycling are particularly low, accounting for only 1% of journeys into the centre of Coventry and between 1% and 4% of residents' journeys when they are commuting, escorting children to school or travelling to their own place of education.
- 12.30 Coventry has a reasonably well-developed cycling and walking network which has benefited from recent initiatives including the city centre public realm programme and the Cycle Coventry project, introducing new cycle routes around the city. These schemes have helped to make a positive contribution towards the creation of an environment which encourages sustainable and active modes of travel. The Council will build on the successes and momentum gained from these projects and intends to implement additional phases of them in tandem with the growth of the city to help encourage residents to make more journeys by bike.
- 12.31 The expansion of safe cycling and walking networks will be delivered via a wide range of schemes, set out in the Council's Transport Strategy and will comprise physical measures to create an environment where walking and cycling are the preferred modes of transport. This concept will be prioritised

through the development of SUE sites. Further guidance is set out in the Coventry Connected SPD and such measures may include:

- segregated cycleways on key corridors;
- School Streets - temporary road closures around schools at pick up and drop off times;
- Liveable Neighbourhoods;
- Traffic calming and speed reductions;
- Wider pavements;
- Increased cycle parking; and
- expanding the provision of the West Midlands Cycle Hire scheme.

12.32 The West Midlands Cycle Charter also aims to raise cycling levels, and deliver change. The charter sees cycling as playing an important role in addressing the challenges the West Midlands face, which include reducing congestion, carbon and pollution, supporting economic growth and employment, tackling obesity and creating places where people want to live, work, learn, shop and do business. The Cycle Charter also supports a Metropolitan Cycle Network which will be integrated with local cycle networks. Opportunities will be sought to deliver additional phases of the network as part of new development proposals. For larger developments, financial contributions may be required which support the enhancement of cycle routes on the wider highway network which are consistent with the IDP and local cycling strategy. High quality cycle parking should also be provided at new sites and along the wider public transport network at interchanges and stations.

12.33 Development proposals should also be in accordance with the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) in terms of incorporating safe, comfortable, convenient and accessible walking and cycling routes that create an environment which encourages walking and cycling when designing schemes both through the site and which link seamlessly to the existing pedestrian and cycling route network. This may require the upgrade of existing routes, facilities, cycle parking lightings, crossing, etc. or the creation of new routes and infrastructure.

12.34 Proposals will also be expected to support the provision of West Midlands cycle hire bike and docking stations to help expand the network across the city.

12.35 In terms of developments in the city centre and adjacent to it, they should, where appropriate, upgrade pedestrian and cycle routes that incorporate improvements to crossing the ring road to enhance connectivity to the city centre from the wider city.

12.36 The type of provision should be determined based on the expected level and speed of traffic and the location and type of development proposal. In accordance with the Manual for Streets cyclists should generally be accommodated on the carriageway in areas with low traffic volumes and speeds. Dedicated off-carriageway infrastructure will be required alongside

more heavily trafficked routes and at intersections. Opportunities will also be sought to develop cycle routes through areas of greenspace which provide opportunities for leisure cycling and direct quiet routes to surrounding areas and amenities. Other supporting measures such as advanced stop lines, directional signage and lighting form an important part of the cycle network and will be expected to be integrated into all major development proposals.

- 12.37 In terms of pedestrians, in many circumstances off-carriageway footways will generally be the preferred option. However, in quieter residential areas, within the city centre and areas where the ratio of pedestrians to traffic is high it may be appropriate to provide shared pedestrian / vehicle surfaces which encourage higher levels of interaction between different travel modes. On more heavily trafficked routes, pedestrian priority measures such as controlled crossing points will be required to make walking as safe and convenient as possible.
- 12.38 Cycle parking, in combination with shower/changing and clothing storage facilities are an essential part of supporting the needs of cyclists and should be catered for. Cycle parking standards are set out in the car parking standards in Appendix 6. The Coventry Connected SPD includes a local strategy for cycling which includes guidance on requirements for cycle route provision, and other supporting infrastructure requirements. This needs to include cycle parking for children's bikes as set out in Appendix 6, particularly at playgrounds and outside shops.

#### **Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility**

1. Development proposals should be in accordance with the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) and incorporate:
  - a. safe, comfortable and convenient access to walking and cycling routes, appropriate for all abilities and needs that include wheelchair accessible routes, consideration of pedestrian desire lines within and outside site boundaries, pedestrian and cycle crossings and improvements and links to the city's towpaths;
  - b. new and upgraded pedestrian and cycle routes where these links do not exist, which are in accordance with national guidance on standards and best practice. These must appropriately link and integrate seamlessly into established networks to ensure that routes are continuous, and they should include connecting to the public transport network, interchanges and stops to deliver seamless integration together with provision of high quality cycle parking. The expected type of provision will depend on the scale, use and location of the site. Upgraded pedestrian routes should include, for development proposals in the city centre where appropriate, improvements to the significant routes and linkages as shown in Figure 8 and where appropriate, development proposals will be required to incorporate

improvements to crossing the Ring Road to ensure enhanced connectivity between the city centre and the wider city for pedestrians and cyclists and should reflect the priorities in the supporting text above. This will be of particular relevance at:

- Ring Road Junctions 1, 2, 4 and 5
  - The Canal Basin crossing between Ring Road junctions 9 and 1
  - Connectivity between Parkside and Much Park Street.
- c. High quality cycle parking (for residents, employees and visitors), which includes provision for children's bikes, larger bikes like cargo bikes and associated facilities, such as changing, showers and storage in line with the cycle parking standards in Appendix 6; and
- d. the provision for West Midlands Cycle Hire docking stations(s) and hire bikes on site for larger development proposals.
2. For larger developments, financial contributions may be required to support improved pedestrian and /or cycling routes on the wider network.
3. The Council will promote walking and cycling by delivering a wide range of walking and cycling schemes. This includes schemes set out in the Council's Transport Strategy and will comprise physical measures to create an environment where walking and cycling are the preferred modes of transport. Such measures may include:
- segregated cycleways on key corridors;
  - School Streets - temporary road closures around schools at pick up and drop off times;
  - Liveable Neighbourhoods;
  - Traffic calming and speed reductions;
  - Wider pavements;
  - Increased cycle parking; and
  - expanding the provision of the West Midlands Cycle Hire scheme.

These measures will be prioritised within existing areas of the city which are negatively affected by increased traffic associated with new development. Proposals should incorporate such measures and financial contributions will be sought to deliver those proposals where the predicted impact of development traffic is significant and measures are needed to support an improved pedestrian and cycle environment.

## **Bus, Demand Responsive Transit and Rapid Transit**

### **Bus Services and Infrastructure**

- 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.
- 12.40 Coventry's Bus Network Development Plan and bus policies as highlighted in the Strategic Transport Plan demonstrate the importance of a partnership approach with TfWM. This will be vital in providing high quality bus services to new developments.
- 12.41 To ensure bus travel is an attractive and convenient option, new development must comply with TfWM access standards and be expected to have access to a bus stop within 400m, with regular service patterns serving the city centre. It is accepted that this may not be practicable for small scale development proposals in more remote parts of the city but developers will be encouraged to liaise with the Council and TfWM to ensure access standards are fully met. For larger development sites, in particular those in more peripheral locations, it will be important that bus services are fully integrated into the whole sites footprint with provision made to accommodate appropriate bus infrastructure including bus shelters and passenger information. Through routes for buses along with suitable bus priority measures should also be provided wherever possible and the Council will work in consultation with developers, bus operators, TfWM and the Passenger Transport Executive to achieve this.
- 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.

### **Interchange, Information and ticketing**

- 12.43 One of the major barriers to encouraging public transport is the need to interchange between different modes and services, often paying separately each time at the point of use, and often with inadequate prior knowledge of when and where the next service will be. A step change is required in the quality of public transport provision which will require complementary measures to:

- Improve the ease of access to interchange facilities and to the quality of the waiting environment within them;
- Provide quality and timely information, both at bus stops and remotely via mobile devices, that can reduce uncertainty for travellers;
- Make payment quick and convenient through the introduction of integrated ticketing systems and cashless smart payment methods which work across all modes and services.

## **Rapid Transit**

- 12.44 In order to manage congestion to acceptable levels and maintain network resilience throughout the plan period, additional public transport provision will be required. To support jobs-led growth in the city, it is apparent that the current public transport network will not adequately address all of additional demands, or meet the expectations of the modern business sector. It is clear that a step change is required to remedy this, and the development of a high quality rapid transit system provides an appropriate and viable solution.
- 12.45 The West Midlands Strategic Transport Plan sets out comprehensive network of rail and rapid transit routes across the Metropolitan area including a new Rapid Transit network for the Coventry area.
- 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 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.
- 12.47 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 with local and national transport networks. Options are also being considered for improved public transport connectivity to proposed HS2 interchange and the UK Central proposal in Solihull through the HS2 Connectivity Package. The identification and feasibility of individual routes will be subject to further study and delivered through the Coventry Connected Transport Strategy and the West Midlands Strategic Transport Plan.
- 12.48 In addition to supporting the needs of existing employment sites, rapid transit also provides a way of unlocking potential development growth sites by significantly improving accessibility. The high quality, fast and reliable

nature of rapid transit increases the viability and attractiveness of services and offers a realistic alternative to local car journeys.

### **Policy AC5: Bus, Demand Response Transit and Rapid Transit**

1. New major development proposals should have safe and convenient access to the existing bus network and comply with the TfWM access standards. In areas where this is not achieved, new development may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site. Development proposals should also have regard to, and where appropriate, make provision for the development of Mobility Hubs. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.
2. The Council will support new bus and rapid transit networks that link communities more directly to places of work, education, essential services, centres, other sustainable transport modes and leisure / recreational / cultural attractions. This includes new or improved routes around the city and new and improved cross boundary routes outside the TfWM area.
3. The provision of demand response transit will be supported within all areas of the city as a convenient alternative for many people, including those less able.
4. The development of a rapid transit network, such as in the form of Very Light Rail will be supported to improve accessibility to existing and new major trip attractors. Major 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. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.
5. Further details will be set out in the Coventry Connected SPD, the TfWM LTP and TfWM Bus Service Improvement Plan.

## **Rail**

- 12.49 Building on its core rail connectivity assets, including excellent rail links on the West Coast Main Line (WCML) between Coventry, London and Birmingham, the Council has developed an ambitious evidenced base in the Coventry Rail Investment Strategy (2013). The strategy sets out a clear case for the need to radically improve rail services which support the economic travel to work area such as services on the north-south corridor between Coventry, the Thames Valley, Warwickshire and the East Midlands. Allied to this, the Council is investing in the delivery of the Coventry Station Masterplan which will result in improved integration between rail and other

modes of transport and the adjacent Friargate regeneration scheme. The delivery of the Coventry Station masterplan redevelopment will improve transport interchange facilities, including facilitating the delivery of the NUCKLE rail scheme and enable the predicted growth in rail passengers to be accommodated. The scheme has already provided improvements to pedestrian accesses, car parking, bus interchange facilities and cycle parking.

- 12.50 Existing stations at Tile Hill and Canley predominantly cater for local rail services between Coventry and Birmingham, although Tile Hill offers some longer distance journey options as far as London. Both stations also act as rail Park and Ride facilities, although the car parks continue to operate at, or near capacity. Measures which address capacity issues will be supported including better integration with bus and rapid transit networks, walking and cycling routes and appropriate capacity enhancements to station car parking.
- 12.51 Additional local rail stations on the WCML to the east of the city serving Willenhall and Binley would allow some of the strong local rail service demand to be met and support the regeneration and economic growth of this part of the city. However, this will need to be considered in the context of wider strategic rail industry plans which plan for capacity on the busy WCML. Options are also being explored for a new station in the south of the city to support new development growth. These stations are also identified in the West Midlands Strategic Plan. Line capacity between Coventry and Birmingham is constrained which causes competition between fast long distance and local stopping services. It is clear that major infrastructure improvements will be required to meet the growing demands to support the growth of the city. Proposals to expand capacity on the WCML which support Coventry's rail connectivity objectives will be supported.

### **High Speed Rail (HS2) and West Coast Main Line (WCML)**

- 12.52 The construction of the high speed railway (HS2) between London and Birmingham is continuing to progress. It will include a new station located close to Birmingham International station approximately four miles from the western boundary of Coventry. Solihull Metropolitan Borough Council is promoting a masterplan called UK Central (UKC) which includes plans to create up to 100,000 new jobs and new housing growth.
- 12.53 It will be important that Coventry is well connected to UK Central and able to form part of a broader UK Central Plus economic offer supported by excellent highway and public transport services. This will enable Coventry to continue to develop and be a major sub-regional hub for growth supporting services and economic activity across the whole area. For example, significant benefits could be gained through improved connectivity to high

profile employers and development sites which are located on linked economic growth corridors including the A45 / A46 and M6 including the University of Warwick, Jaguar Land Rover and the area around Whitley and Coventry airport. Existing constraints along these corridors may impede the demands of potential growth and it is likely therefore that measures may be required to improve connectivity along new and improved transport corridors in or adjacent to Coventry. Proposals which enhance that connectivity will be supported.

- 12.54 The construction of HS2 is likely to affect service patterns on the WCML to reflect the introduction of new high speed services. It will be important that existing services which support the local growth agenda are protected, and opportunities are seized which support improved connectivity objectives in the Coventry Rail Investment Strategy.

### **Policy AC6: Rail**

1. Proposals which improve the quality of local rail services and access to stations and rail interchange facilities will be supported. These include:
  - a. Improved access to rail stations, including HS2, by all modes of travel;
  - b. Improved interchange facilities between rail and other modes; and
  - c. Enhancements on the rail network which increase the frequency and quality of rail services which serve Coventry.
2. Measures which support the delivery of objectives in the West Midlands Rail Executive Rail Investment Strategy and Midland Connect Strategic Transport Plan for improved rail connectivity will be supported. This includes measures which facilitate improved rail services and supporting rail infrastructure, including further 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.
3. Proposals for additional local railway stations on the east-west and north/south rail corridor within Coventry will be supported where they are proven to be viable, support growth objectives and are consistent with the relevant national, regional or local rail strategies.
4. Further details are set out in the Coventry Connected SPD, West Midlands Rail Executive Rail Investment Strategy and Midland Connect Strategic Transport Plan.

## Freight

### Road Freight

- 12.55 The efficient movement of freight is essential to support economic growth. In addition to supporting existing businesses, freight movements provide opportunities to generate additional employment through the creation of logistical and freight industries. The central location of Coventry and its high level of access to the strategic route network strengthens this opportunity.
- 12.56 On-street lorry parking, particularly around major employment and distribution sites, can create highway safety issues. These issues arise through a combination of factors such as specific delivery slots resulting in vehicles waiting on-street, and a lack of dedicated onsite HGV parking. Where new developments are expected to require large numbers of lorry movements, appropriate parking and turning facilities must be provided onsite to minimise disruption on the public highway and on sites with 24 hour operations, overnight HGV parking and facilities (such as toilets and showers) should be provided.
- 12.57 It is also important that new developments demonstrate that they can function without requiring HGVs to travel on smaller, residential roads. This is in the interest of highway safety and to reduce congestion and air pollution in line with the Council's Future Highway Network Plan. To aid this, the Council will support, where appropriate, proposals for Freight Consolidation Centres, in appropriate edge of centre locations, close to the strategic road network, to reduce volumes of HGV/LGV traffic with the city.
- 12.58 Developments will be expected to provide for and make provision for sustainable delivery methods, such as e-bikes, cargo bikes and autonomous delivery methods and other emerging technologies as alternatives to deliveries made by vehicles.

### Rail Freight

- 12.59 There is currently limited scope for additional rail freight access within the city. Opportunities for additional facilities which arise within the plan period will generally be supported, but will need to be assessed on their individual merit and be consistent with the relevant rail industry plans.

### Policy AC7: Freight

1. New developments on sites which generate or are likely to generate significant HGV movements will be supported where they:
  - a. accommodate appropriate on-site lorry parking and turning facilities to minimise disruption and safety issues on the public highway.

- b.** Where they have 24 hour operations, provide overnight HGV parking and facilities such as toilets and showers;
  - c.** Can demonstrate that they can function without requiring HGVs to travel on smaller, residential roads, in line with Policy JE5.
  - d.** Submit a delivery and servicing plan that includes a method for monitoring trips to and from the site.
- 2.** Freight consolidation and distribution centres will be supported in appropriate edge of city locations close to the strategic road network to reduce the volume of HGV/LGV traffic within the city and where they provide appropriate welfare facilities for drivers as well as employees.
- 3.** Where appropriate, the Council will support proposals that utilise sustainable delivery methods and make provision for them, such as e-bikes, cargo bikes and autonomous delivery methods and other emerging technologies.
- 4.** New development which supports the use of rail and air freight facilities will be supported where there is an evidenced demand, proposals are consistent with the relevant air and rail industry plans, have an acceptable environmental impact and do not significantly compromise the capacity and safety of the local highway network.

## 13. Environmental Management

### Key evidence

Strategic Flood Risk Assessment 2022

Climate Change Strategy 2024

Water Cycle Study 2024

Carbon Policy Support 2024

Heat Network Zoning 2023

West Midlands Metropolitan Area Local Aggregate Assessment Report

Coventry Air Quality Management Area Order, 2009

Coventry's Municipal Waste Management Strategy 2008-2020

Environmental Management Background Paper

### Planning for climate change

- 13.1 The impacts of flooding, overheating and other consequences of climate change have the potential to hinder the creation of vibrant, healthy and sustainable communities in Coventry. The outcomes of climate change will also have serious impacts on vulnerable and deprived communities and those least able to respond.
- 13.2 Coventry City Council's One Coventry Plan (2022-2030)<sup>1</sup> sets out a vision for the city which includes three delivery priorities, one of which is tackling the causes and consequences of climate change. This is supported by the Council's draft Climate Change Strategy<sup>2</sup>, which details the Council's ambitious commitments to transition to net zero by 2050 and become a leading city for the green industrial revolution.
- 13.3 Without comprehensive action, climate change will severely limit economic growth. However, the approaches now required present a significant opportunity to deliver a decarbonised and resilient economy that supports job creation. Through the Climate Change Act 2008 and as a signatory of the Paris Agreement, the UK Government has committed to:
  - a. reduce emissions by at least 100% of 1990 levels by 2050; and

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<sup>1</sup> <https://www.coventry.gov.uk/onecoventryplan>

<sup>2</sup> <https://www.coventry.gov.uk/climate-change/tackling-climate-change/2>

- b. contribute to global emissions reductions aimed at limiting global temperature rise to well below 2°C and to pursue efforts to limit temperatures to 1.5°C above pre-industrial levels.
- 13.4 Local planning authorities are bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that planning policy contributes to the mitigation of and adaptation to climate change. According to guidance issued by the Town and Country Planning Association and the Royal Town Planning Institute (updated in 2023),
- 13.5 Chapter 14 of the NPPF addresses the duty of planning in helping to contend with a changing climate and the vulnerabilities it generates in the built and natural environments. This includes planning for zero and low carbon development, requiring renewable and low carbon energy supply, reducing emissions and greenhouse gases, the mitigation of flood risks and employing appropriate policy and design solutions to address rising temperatures, ventilation, the need for additional green infrastructure and the protection of the natural environment. The NPPF states that plans should take a proactive approach to mitigating and adapting to climate change. Development should be planned for in ways that help eliminate greenhouse gas emissions, such as through consideration of its location, orientation and design. As part of this approach, the opportunity to reduce carbon in both the fabric of new buildings and the generation of related energy has also been taken into account.
- 13.6 The West Midlands Combined Authority declared a climate change emergency in June 2019. In July 2019, it committed to net zero carbon emissions by 2041. This means that the region will be working towards meeting these targets through the timescale of the Coventry Local Plan Review plan period.
- 13.7 A Net Zero Routemap has been produced for Coventry by Professor Andy Gouldson, a lead Climate Advisor for the UK Infrastructure Bank. The Routemap sets out the results of analysis that assesses past, present and projected energy use and carbon emissions from the different sectors in Coventry and explores different options for achieving net zero in Coventry. Given that the domestic and commercial properties account for 45% of the city's total carbon emissions, it is critical that there is a step change in the city's approach to future development to support the transition towards net zero. It is therefore vital that the Coventry Local Plan Review supports this scale of ambition and provides a policy framework to deliver more sustainable development.
- 13.8 Changes to Part L of Building Regulations came into effect in June 2022, which introduced a carbon reduction improvement of c.31% for all major

developments. The changes also significantly improve energy efficiency standards for new homes and further improvements under the “Future Homes Standard” are anticipated during the Plan period. However, given the urgency of the climate change crisis and the amount of development anticipated across the Plan period, it is vital that use of energy from non-renewable sources by new homes, and other types of development, is minimised as far and as early as possible, until overtaken by any further revision of Building Regulations.

13.9 To help increase the use and supply of renewable and low carbon energy and heat, the Council policy provides a positive strategy for energy from these sources. The policies set out how energy infrastructure will be considered, including how opportunities for decentralised energy<sup>3</sup> and district heating<sup>4</sup> will be identified.

13.10 In definition of Grey water the local plan considers this to be water from baths, showers, and hand basins for toilet flushing, irrigation, or washing machine supply.

## STRATEGIC POLICY

### Policy EM1: Planning for Climate Change Adaptation

1. Development is required to be designed to be resilient to, and adapt to the future impacts of climate change through the inclusion of the following measures:
  - a. using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures and address overheating in new buildings;
  - b. optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading;
  - c. incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment to achieve a water efficiency target of 100l/pd to be achieved using a fittings-based approach;

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<sup>3</sup> Energy that is generated close to where it will be used, rather than at an industrial plant and sent through the national grid, including micro-renewables, heating and cooling. It can refer to energy from waste plants, communal or district heating and cooling, as well as geothermal, biomass or solar energy. Decentralised heat or power networks can serve a single building or a whole community, even being built out across entire cities.

<sup>4</sup> A system that distributes heat or hot water from a central source to a group of residential or commercial buildings through a network of underground pipes carrying hot water. Heat networks can be supplied by a range of sources including energy-from-waste (EfW) facilities, combined heat and power (CHP) plants and heat pumps. The advantages include cost savings, higher efficiencies and carbon emission reductions.

- d. minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SuDS in accordance with Policy EM4 and EM5;
  - e. Where applicable, maintain and enhance the canal network to reflect the canals' role in urban cooling;
  - f. seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change challenges;
  - g. major developments must consider making connections available to the Coventry Heat Network in areas identified as Heat Network Zones;
  - h. development must meet net zero (regulated operational carbon) for residential and non-domestic development including the need to address embodied carbon and waste;
  - i. demonstrate how the concept of water neutrality has been addressed in relation to the potential to provide a benefit in improving resilience to climate change and enabling all waterbodies to be brought up to 'Good' status; and
  - j. Larger residential developments (including new settlements), and commercial developments should consider incorporating greywater recycling and/or rainwater harvesting into development at the master planning stage to reduce water demand.
2. Set out how the requirements of the policy have been complied with including justification for why the above measures have not been incorporated.
  3. Where justification for non-compliance with the requirements is based on viability, this will need to be clearly demonstrated through an open book financial appraisal.

## **Note on Policies EM2 (Building Standards) and EM3 (Renewable energy)**

13.11 Policies EM2 and EM3 from the 2017 adopted plan have been deleted and a suite of new policies (EM11-EM14) have been introduced later in this chapter.

## **Water Quality and Flood Risk**

13.12 It is important to apply this policy in the context of the Council's Local Flood Risk Management Strategy and Surface Water Management Plan to ensure that all links are made to the aims and objectives of these plans. This will help ensure that the areas identified as at risk of flooding, either fluvial or surface water, are fully considered where applications in such areas are received.

- 13.13 In accordance with the NPPF, the overall aim of this policy is to direct development away from areas of high flood risk and avoid inappropriate development in areas at risk of fluvial and pluvial flooding. Where development cannot take place in areas of low flood risk, a sequential test should be applied in which it is acknowledged that extensive areas of built development fall into the high risk areas and that the re-use of previously developed land may be needed to avoid economic stagnation. Where in the wider overall interest, development is supported as an exception to this policy with high risk areas, applicants will need to demonstrate that they strictly comply with all criteria of the policy.
- 13.14 The Environment Agency have produced a local area climate change guide which sets out how they would expect climate change to be considered in applications. The most up to date indicative flood zone maps are available from the Environment Agency directly. Additional information may be obtained by contacting the Council's Flood Risk Management and Drainage team, in addition to the maps that accompany the SFRA.
- 13.15 All major developments must be assessed in respect of the level of flood risk from all sources taking into account the impact of climate change. If development in areas at risk of flooding is the only option following the application of the sequential test, it will need to consider the following:
- the type of development is appropriate to the level of flood risk associated with its location with reference to Coventry's Strategic Flood Risk Assessment (SFRA) flood zone maps (as amended) and/or a site specific flood risk assessment, as set out in Table 2 in the Flood Risk and Coastal Change section of the National Planning Practice Guidance (NPPG).
  - the type of development must be appropriate both at the time permission is sought and at the end of the lifetime of the development, taking into account the latest climate change guidance.

## **Policy EM4 Flood Risk Management**

1. All developments must be assessed in respect of the level of flood risk from all sources, taking into account current and future impacts of climate change. Where development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where all of the following criteria are met:
  - a. the type of development is appropriate to the level of flood risk associated with its location in reference to Coventry's SFRA flood zone maps and advice on appropriate uses within these zones from the Environment Agency and Lead Local Flood Authority (LLFA);
  - b. it is provided with the appropriate minimum standard of flood defence and resilience to aid recovery (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development;

- c. 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;
  - d. in the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk, and;
  - e. in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events.
- 2. 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. In this instance, reference should be made to the Councils IDP. In order to achieve this:
  - a. the functional floodplain (Flood Zone 3b) should be protected from development and reinstated in brownfield areas wherever possible;
  - b. single storey buildings, basements and buildings on stilts will not be acceptable in Flood Zones 2 and 3;
  - c. all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged;
  - d. 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) of Main Rivers and 5m from Ordinary watercourses for maintenance access. This includes existing culverted watercourses.
  - e. finished floor levels must be set a minimum of 300mm above the pluvial 1% Annual Exceedance Probability (AEP) (1 in 100 year) plus climate change and 600mm above the fluvial 0.1% AEP (1 in 1000 year) plus climate change flood level.
- 3. Where a development benefits from existing or proposed flood measures, the development should contribute towards the capital and/or maintenance of these measures over the lifetime of the development.
- 4. For sites in Flood Zone 3a, development should not impede flow routes, reduce floodplain storage or consume flood storage in a 'flood cell' within a defended area. If the development does result in a loss of storage, compensatory floodplain storage should be provided on a 'level for level' and 'volume for volume' basis.
- 5. For sites in Flood Zone 3a, all types of new development behind flood defences should be avoided, where possible, due to the residual risks of breach and overtopping. Development should ensure that it would not prevent the Water bodies' ability to reach good status or its potential to do so as set in the Severn River Basin Management Plans and should support, where possible, to improving the status class.

6. A sequential, risk-based approach to the location of suitable development will be undertaken by the Council based on flood maps, SFRA flood zones and Vulnerability Classification to steer new development to areas with the lowest probability of flooding avoiding, where possible, flood risk to people and property and managing any residual risk.
7. The Exception Test is applicable where there are areas in Flood Zones 2 and 3 where the Sequential Test alone cannot deliver acceptable sites but where some continuing development is necessary. The Exception Test will apply where development will provide wider sustainability benefits that outweigh flood risk, fully informed by an appropriately scaled Flood Risk Assessment (FRA) which indicates 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, reducing overall flood risk.
8. Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme, they may be expected to contribute towards the cost of delivery and/or maintenance of that scheme in accordance with Policy IM1.
9. A FRA is required, appropriate to the scale and nature of the development proposed, where the development is:
  - a. within a river floodplain, as defined by the Coventry SFRA indicative flood zone maps;
  - b. within 20 metres of any watercourse;
  - c. adjacent to, or including, any flood bank or other flood control measure / structure;
  - d. within an area where there may be surface water issues and drainage problems;
  - e. within an area where there is flood risk from canals, reservoirs or flooding from sewers.
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.
11. All proposals will be expected to demonstrate, how, in areas at risk of flooding, the safety of those sleeping in any ground floor accommodation will be secured.

## Sustainable Drainage

13.16 SuDS involve a range of techniques that mimic the way that rainfall drains in natural systems and avoids any increase in flood risk and improves water quality. Many existing drainage systems can cause problems of flooding, pollution or damage to the environment and are not proving to be sustainable in the long term. The key objectives in the use of SuDS are:

- reducing flood risk and mitigating the impacts of climate change;
- maintaining and restoring natural flow routes together with the rate and volume of surface runoff to reduce the risk of flooding;
- improving the water environment quality;
- minimising diffuse pollution;
- reducing pressure on the sewerage network;
- improving habitat, biodiversity and local amenity;
- harness opportunities to incorporate multi-functional uses such as green space play areas.

13.17 The Council is also the Lead Local Flood Authority (or LLFA for short) with responsibility for developing, maintaining and monitoring a Local Flood Risk Management Strategy in partnership with other relevant bodies in the area. In addition, the LLFA is a statutory consultee on all major planning applications and a consultee on a non-statutory basis on all minor applications whilst also advising on the approval of all sustainable drainage and related systems, surface flooding and ground water for all planning applications.

13.18 In respect of SuDS, it is important to emphasise the need for a management train where drainage techniques can be used in series to change the flow and quality characteristics of the runoff in stages. For a management train to work effectively the train must contain the right type of SuDS. The detail for this would be set out in the SPD, but all consideration should be given to the principle by ensuring developments implement source controls as part of the management train. In environmental terms this approach is good for water quality. With respect to future maintenance, it places the responsibility with the development owner and reduces or eliminates runoff from the small rainfall events which constitute the majority of rain events.

13.19 Separate guidance will detail how SuDS schemes will be designed, adopted and maintained in accordance with the technical standards set out by the Sustainable Drainage Systems Approval Bodies (SABs). As part of the Transport and Infrastructure Design Guide, a separate guide will indicate the National and Local technical standards for SuDS schemes.

## Policy EM5 Sustainable Drainage Systems (SuDS)

1. Schedule 3 of the Flood and Water Management Act (FWMA) 2010\* provides the framework by which all new developments are required to apply SuDS and should ensure that surface water runoff is managed as close to its source as possible. The FWMA gives SuDS Approval Bodies (SABs) statutory responsibility for approving and where appropriate, adopting, the approved SuDS features.
2. SuDS are the preferred way of managing and conveying surface water. All developments will consider and demonstrate how the following hierarchy for the discharge of surface water from a site will be applied:
  - a. Discharge by infiltration, attenuation, water reuse technologies and green roof technology;
  - b. Discharge to a watercourse allied with attenuation, water reuse technologies such as green roof technology;
  - c. Discharge to surface water sewer allied with attenuation, water reuse technologies and green roof technology.
3. Where proven that infiltration allied with water reuse technologies is not possible, surface water should be discharged into a main river or ordinary watercourse (in agreement with the Environment Agency and the LLFA) at a rate no greater than Qbar greenfield runoff, or an appropriate minimum rate for small sites, agreed by the LLFA. If there is no watercourse available then, allied with water reuse technologies, surface water should be discharged to a surface water sewer at a rate no greater than Qbar greenfield runoff.
4. In exceptional circumstances where a sustainable drainage system cannot be provided, it must be demonstrated that it is not possible, and an acceptable alternative means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation with a reduction in peak and total discharge.
5. The developer must agree all long-term maintenance arrangements for all SuDS with the SAB, including the means for funding the maintenance for the lifetime of the development.

\*Flood and Water Management Act (FWMA) 2010 or future equivalent.

## Previously Developed Land

- 13.20 When promoting land affected or potentially affected by contamination developers and site promoters are actively encouraged to engage with the Environment Agency as early as possible in the planning process to follow the risk

management framework provided in Land Contamination Risk Management (LCRM) 2020. Furthermore, it is advised to refer to the Environment Agency's Guidance on Requirements for Land Contamination Reports (2005) for the specific type of information that we require to assess the risks to Controlled Waters. It is recommend that developers should:

- Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination
- Refer to the Environment Agency's Guiding principles for land contamination for the type of information that they require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land
- contamination risks are appropriately managed
- Refer to the contaminated land pages on:  
[www.gov.uk/government/collections/land-contamination-technical-guidance](http://www.gov.uk/government/collections/land-contamination-technical-guidance)

13.21 The Environment Agency require the risk to groundwater of any significant contamination to be considered by a desk study, site investigation and subsequent conceptual model and risk assessment, where necessary leading to suitable remedial action and related method statement. This is in accordance with the NPPF (Para 109 -112), which indicates that where development is proposed on land that is known or suspected to be affected by contamination then the risks to human health and the wider environment should be assessed by the applicant for consideration by the LPA prior to determination.

13.22 The assessment should provide such information as is necessary to determine whether the proposed development can proceed. Where such assessment shows that remediation is required then the standard of remediation that should be achieved through the grant of planning permission for new development is the removal of unacceptable risk and making the site suitable for its new use, including the removal of existing pollutant linkages. All receptors relevant to the site should be protected to an appropriate standard. As a minimum, after carrying out the development and commencement of its use, the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

13.23 Development proposals will need to comply with the Environment Agency publication 'Groundwater Protection: Policy and Practice' (GP3) which may require development to be restricted at certain locations with a need to give careful consideration given to the potential water quality risks and impact on flooding and surface water drainage.

## **Policy EM6 Redevelopment of Previously Developed Land**

- 1.** Development will be supported where proposals do not have a negative impact on water quality, either directly through pollution of surface or groundwater or indirectly through the treatment of wastewater by whatever means.
- 2.** Prior to any potential development, consultation should be held with Severn Trent Water Ltd to ensure that the required wastewater infrastructure is in place in sufficient time. In line with the objectives of the Water Environment Regulations, development must not affect the water bodies' ability to reach good status or its potential, as set in the Humber and Severn River Basin Management Plans and where possible should support improving the status class.
- 3.** Developers and operators must provide adequate information when submitting their proposals so that the potential impact on groundwater resources and quality can be adequately assessed. This should include a risk assessment demonstrating there would be no adverse effect on water resources.
- 4.** Development will not be permitted within a groundwater Source Protection Zone 1 which would physically disturb an aquifer. This will include situations where proposed wastewater infrastructure could pose an unacceptable risk of pollution of the underlying aquifer or receiving watercourse.
- 5.** Development must meet a water efficiency target of 100l/pd using a fittings-based approach.
- 6.** New build non-residential development greater than 1000sqm to achieve at least 4 credits in the Wat01 Measure for water in the Building Research Establishment Environmental Assessment Method (BREEAM) New Construction standard.

## **Air Quality**

13.24 As previously highlighted in the Accessibility chapter of this Plan, the whole of Coventry is designated as an Air Quality Management Area and has been since 2009. Emissions from road transport are the major source of pollution in Coventry, with emissions from industry also contributing. It must be recognised that transport requirements associated with the construction phase itself has a negative impact upon air quality. Under Part IV of the Environment Act 1995, the Council carries out annual review and assessment of air quality in the city, within the context of national air quality standards and objectives.

- 13.25 As a partner of the Low Emissions Towns and Cities programme (LETCP), the Council is working together with its West Midlands neighbours to improve air quality and reduce emissions from road transport. This is alongside the emerging 'West Midlands Metropolitan Transport Emissions Framework' which sets out transport's role in tackling air quality issues and has proposed a range of policies. The intention is to do this by promoting the uptake of low emission fuels and technologies, establishing and sharing best practice policies, and developing various tools and resources. The objectives of the programme are to investigate and produce various regional strategies designed to improve air quality, with a view to meeting national air quality objectives.
- 13.26 Funded through the DEFRA Air Quality Grant, the aims of the LETCP and West Midlands Transport Emissions Framework are to:
- Improve air quality through the reductions in road transport emissions, and simultaneously reductions in carbon emissions;
  - Establish best practice policies and measures for the West Midlands, creating transferable models for other towns and cities;
  - Improve health; and
  - Maximise opportunities for economic development through the transition to a green economy.
- 13.27 To support the improvement in the city's air quality this policy should be applied in conjunction with the Low Emissions Strategy and Good Practice Guidance on Planning and Procurement for the West Midlands (2014) developed by the LETCP. All major developments will therefore be required to undertake full air quality assessments. Where appropriate exposure assessments will also apply to smaller developments in accordance with this guidance.
- 13.28 Exposure assessments will need to include an understanding of potential exposure to pollutants, as well as a proposal for mitigation measures such as:
- designing buildings to ensure local people are less exposed;
  - green areas are incorporated into development to help create barriers to pollutants;
  - that building layout and design prevents the creation of wind tunnels and canyons to help the dispersal of pollutants.
  - This policy should be applied in conjunction with the Low Emissions Strategy and Good Practice Guidance on Planning and Procurement for the West Midlands.
- 13.29 Specific attention should be paid to location of sensitive developments, e.g. schools, hospitals, residential areas. Detailed methodology for full air quality and exposure assessments should however be agreed with the Council. Mitigation and compensation measures, ensuring that all developments are sustainable from an air quality perspective, should be submitted with all proposals. Where

appropriate, such measures may be secured through a legal agreement. Recommended measures for all types of developments can be found in the LETCP Air Quality Planning Guidance.

### **Policy EM7 Air Quality**

1. Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development should be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality and be in accordance with the West Midlands Transport Emissions Framework and associated policies.
2. Major Development proposals will be required to demonstrate that they do not lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address:
  - a. The existing background levels of air quality;
  - b. The cumulative background levels of air quality (related to the cumulative impact of developments in an area); and
  - c. The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of the air quality deterioration.
3. This policy will be applied in line with the Air Quality SPD.

### **Waste**

13.30 The Council recognises the importance of sustainable waste management both locally and in cooperation with its neighbours to ensure that all the waste management needs of the area are met. The key challenges for future growth in waste will be balancing economic prosperity and associated growth with the financial strains of providing necessary infrastructure. Waste policy of the Local Plan is applied in accordance with the Council's [Waste Strategy](#).

### **Policy EM8 Waste Management**

1. The Council's Waste Management Strategy will be supported through:
  - a. encouraging less consumption of raw materials through the reduction and re-use of waste products;

- b.** a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles;
  - c.** encouragement of new methods of processing and recycling at waste management sites;
  - d.** supporting recycling proposals for aggregate materials subject to the criteria in part 2 of this policy;
  - e.** Existing waste management facilities or land allocated for waste management uses being protected from encroachment by incompatible land uses that are more sensitive to odour, noise, dust and pest impacts; and
  - f.** Proposals for waste management facilities only being permitted where they would not have an unacceptable impact on the quantity or quality of surface or groundwater resources.
- 2.** Proposed new or expanded waste management facilities will be assessed against the following criteria:
  - a.** The effect of the proposed waste facility upon the environment and neighbouring land uses;
  - b.** The impact of traffic generated by the proposal and the availability of alternative transit modes, such as rail and waterways;
  - c.** The need for pollution control measures appropriate to the type of waste to be processed or handled;
  - d.** The impact of proposals on residential amenity. New waste facilities will not normally be approved adjacent to existing housing and proposals for anaerobic digestion will not be approved in close proximity to existing housing;
  - e.** The effect of proposals on aircraft safety; and
  - f.** The design of the proposal. Careful consideration should be given to the need to minimise environmental and visual impact. Wherever feasible, waste operations should be enclosed within buildings or sealed structures in order to minimise impacts on adjacent uses from noise, ordure, vermin and wildlife. Proposals advocating open air unenclosed storage of organic odour producing material will not be supported.
- 3.** Proposals will be supported where it is demonstrated that these criteria are satisfied.
- 4.** Development proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that

provide adequate space to facilitate waste storage, reuse, recycling and composting.

## Minerals

- 13.31 The continued supply of aggregates and other material, including recycled and secondary materials is required to meet current and future needs of the development and construction industry. Promoting the use of recycled and secondary materials will help to minimise both primary extraction and waste and so is reflected in Policy EM8.
- 13.32 The National Planning Policy Framework requires local planning authorities to define Mineral Safeguarding Areas (MSAs) in Local Plans in order that proven mineral resources are not needlessly sterilised by non-mineral development, although there is no presumption that resources defined in MSAs will be worked.
- 13.33 MSAs are required to identify what are considered to be economic deposits of mineral. The purpose of MSAs is to ensure that mineral resources are adequately taken into account in all spatial planning decisions. They do not automatically preclude other forms of development taking place, but highlight the presence of economic minerals so that it is considered, and not unknowingly or needlessly sterilised.
- 13.34 In areas where extraction is permitted or is planned, Mineral Consultation Areas will be designated. None are proposed for Coventry during this plan period as there are no anticipated active mineral sites that are being brought forward during the plan period. This has been evidenced through the British Geological Society's Mineral Safeguarding Project, which has been undertaken for the Coventry, Solihull and Warwickshire authorities.
- 13.35 In Coventry, the predominant economic mineral resource is coal. MSAs for this mineral have been identified having had regard to advice in the 'Guide for Mineral Safeguarding in England' produced by the British Geological Society (BGS) in November 2007. The former coal mining site at Daw Mill (which lies outside Coventry's boundaries) previously had a direct impact on the extensive concealed coal reserves that extend across the southern coalfield. These areas lie in the north western areas of Coventry's administrative boundary. Following the closure of the site however, the mining of this area is now highly unlikely.
- 13.36 Local authorities are required to prepare a Local Aggregate Assessment (LAA) to assess the capacity and outputs from existing sources, and to assess future supply options. Work is undertaken collaboratively by the seven West Midlands Metropolitan Authorities in order to address cross boundary mineral planning issues. The Council will continue to proactively work with its neighbours through

joint working and collaborative efforts via the West Midlands Aggregate Working Party.

### **Policy EM9 Safeguarding Mineral Resources**

Mineral Safeguarding Areas are defined for mineral reserves that are considered to be of current or future economic importance. Where developments are proposed in these areas, the application needs to acknowledge the presence of these mineral reserves. The extent of Mineral Safeguarding Areas are defined on the Policies Map.

13.37 In terms of non mineral development in Mineral Safeguarding Areas, the policy aims to take a balanced approach to protecting minerals resources in Coventry against the need to attract investment and urban regeneration to a primarily built up area.

13.38 This policy ensures that all proposals for non-mineral working within the designated MSAs are properly considered and evaluated in partnership with the Coal Authority. The Policy also aims to ensure that development proposals within the Plan are deliverable without complete sterilisation due primarily to the extensive deep cast coal reserves to the West and North West of the city. Within this location this has been further emphasised by the closure, and planned redevelopment of the Daw Mill Colliery, which would have provided the primary access point for the extraction of such reserves. Development identified within policies H2 and/or JE2 would not therefore be subject to this policy

### **Policy EM10 Non Mineral Development in Mineral Safeguarding Areas**

All non-mineral development proposals in the designated Mineral Safeguarding Areas should assess and evaluate the legacy of past mining heritage and should consider this in accordance with Policy EM2. It should also ensure that development does not entirely sterilise any potential future mineral extraction should this become viable and desirable. This should be considered in partnership with the Coal Authority.

## **Energy Infrastructure**

13.39 The ways in which heating and power are delivered to and used in development will need to change to meet the requirements of a zero-carbon future and the intended reduction of greenhouse gas emissions. The use of fossil fuels and traditional forms of energy generation will need to be phased out and replaced by zero-carbon, non-polluting and energy-efficient sources. These methods will

include the use of heat networks and communal heating systems, wherever possible.

- 13.40 Sections 1 – 4 of the policy should be addressed at design and post-completion stages, to ensure that the development has been built to intended standards. Post-completion resubmission of the original energy statement including energy performance calculations, informed by the relevant tests to systems and fabric, should be required as a condition as part of the planning application process. Compliance with sections 6 and 8 should also be demonstrated post-completion through planning condition.
- 13.41 Sections 1, 4 and 9 should also be demonstrated at planning application stage through the submission of an energy statement (and corresponding Viability Assessment if required), which should include associated output reports from energy modelling software (e.g. Standard Assessment Procedure (SAP), Building Research Establishment Domestic Energy Model (BREDEM), Passive House Planning Package (PHPP), or Home Energy Model (HEM) when available for general use).

## **Fabric efficiency**

- 13.42 Applicants are expected to target reductions in the energy demand of buildings under section 1; a minimum 63% improvement is sought. Reducing the total energy demand of a building will reduce the overall provision of renewable energy required by section 4. The Council will expect applicants to deliver energy savings to the greatest extent possible before renewable energy provision is designed, or if offsetting is proposed.
- 13.43 In addition, where it is not feasible or viable to deliver the required renewable energy generation to meet section 4, the Council will expect applicants to reduce the energy demand of the building(s) to the greatest extent possible. This seeks to ensure that the building reduces its energy demand first and operational costs are minimised for occupiers.

## **Non-mandatory energy targets in section 2**

- 13.44 Achievement of these energy efficiency performance levels will reduce the amount of solar PV required under section 4. This can save the applicant costs in renewable energy provision and / or energy offsetting.
- 13.45 Performance against these non-mandatory targets would need to be calculated using a method that accurately predicts energy use. SAP is not suitable for this due to its poor predictive accuracy. PHPP is a suitable methodology. The Council may subsequently take a view on whether the incoming HEM may be suitable when HEM's final form is known.

## Steps to calculating and narrating amount of renewable energy provision

- 13.46 First, calculate the total predicted annual energy use in Kilowatt Hour (kWh) for all proposed new buildings (whole buildings, regulated and unregulated, after all the measures proposed in the application towards compliance with section 1). This can be modelled using SAP, BREDEM (the methodology on which SAP is based), or PHPP. PHPP is the preferred model due to its accuracy, to avoid SAP's inaccuracies at predicting actual energy use in operation (SAP underestimates space heat demand, overestimates unregulated energy, and may overestimate hot water use). The Council may later take a view on whether the incoming HEM is a suitable method for energy use prediction when the final form of HEM is available.
- 13.47 Second, calculate the annual renewable energy generation for whole site in accordance with the Microgeneration Certification Scheme (MCS) guidance for the relevant renewable energy technology (anticipated to be solar PV in most cases as this is typically the most suitable technology in an urban setting). This does not have to be exclusively on the buildings themselves and can include provision of new standalone renewable energy installations within the site. The figure does not include renewable heat delivered by heat pumps, as that would count instead towards section 1.
- 13.48 Third, deduct the annual renewable generation from the annual energy use. The result should be zero or less. If the result is not zero or less, explore how to provide more on-site renewable energy (for example through an adjustment to roof orientation, and ensuring PV area provision has been explored up to at least equivalent of 70% of projected building footprint including roof overhangs and with reasonably efficient panels available on the market).
- 13.49 If it proves unfeasible to increase renewable energy generation on-site to result in an annual balance of energy generation with energy use, then divide the total annual renewable energy generation by the building footprint. This result should be at least 114.9kWh. If this is impossible, provide evidence as to why this is not possible even with a PV area equivalent to 70% of projected building footprint and reasonably efficient panels available on the market.
- 13.50 Finally, calculate the residual energy demand (whole building, not per m<sup>2</sup>) for all proposed new buildings after all measures proposed in sections 1 and 4, then proceed to use this figure to calculate the required amount of offsetting provision in section 5.

## Offsetting calculations

- 13.51 This is a one-off payment, where the annual shortfall in on-site renewable energy generation is multiplied by the energy offset price. Because the kWh energy use of the home and the kWh of energy generation that the offset fund will install are both annual figures, this amount does not need to be multiplied by a number of years.
- 13.52 The requirement for offsetting may be applied flexibly where it is demonstrated that this makes social and affordable housing unviable due to unique site circumstances that result in cost uplifts significantly higher than assessed in the Whole Plan Viability Assessment. As detailed previously, the flexibility could include a reduction in the scope of energy that has to be offset, or a reduced price per kWh if the Council is confident the scheme can still deliver the required amount of PV for that reduced price. The per-kWh price stated in the policy reflects an average of several recent years' per Kilowatt Peak (kWp) median cost for PV installations sized 4-50kWp (source: Department for Energy Security and Net Zero data), divided by a typical output (kWh per kWp) with Sandwell's annual average sunlight. The national data set gives costs for installations at three different sizes: 0-4kWp, 4-10kWp, or 10-50kWp. The larger-scale installations have a lower cost per kWp.
- 13.53 If the Council chooses to allow a lower offset price, a good guideline minimum would be no lower than the lowest price stated in the most recent available version of that national data set – unless the Council can deliver the PV at an even lower price (for example, via the Council's access to more affordable sites, local supply chains or combining the PV installation with other planned works). The degree of flexibility will depend on the unique scheme characteristics and evidence submitted the local authority about what could be viably accommodated.

## Assured performance methods

- 13.54 These are processes to follow throughout design, construction, commissioning and building handover that reduce the energy performance gap (the gap between predicted energy use and actual energy use). These not only help keep the building's actual carbon emissions to a minimum (as opposed to their predicted emissions using inaccurate methods like SAP), but they also help to ensure occupant satisfaction. Suitable methods include Building Services Research and Information Association (BSRIA) Soft Landings<sup>119</sup>, NEF / GHA Assured Performance Process<sup>120</sup>, and Passivhaus certification. Other processes may be available or become available during the course of the plan. Alternative processes proposed by the applicant will be subject to consideration by the Council on their evidence-based merits. There are also some additional tools available that are not in themselves an assured performance process but

that can assist in improving the energy performance of a building in use, such as BS40101121.

## **Applicability to outline applications**

- 13.55 Compliance with the policies will be conditioned at outline stage and must be confirmed in detailed reserved matters. However, the Council accepts that the degree of detail provided in the outline energy strategy will be less than that for full and reserved matters applications. It is also recognised that this means the outline energy calculations may be largely based on assumptions. The aim should be to demonstrate that options have been identified by which the development could comply with the policy targets, considering the broad mix of anticipated floorspace, typologies and site conditions. Statements made about estimated carbon and energy performance based on a high degree of assumptions at outline stage should be reassessed at detailed reserved matters, albeit the reserved matters may diverge in how the required compliant performance will be achieved.
- 13.56 Where more detail is known, it should be reflected in the outline application; for example, if development is expecting to connect to a site-specific low-carbon energy source. As a further illustration, if a limited number of repeated home types are expected on a site, the energy modelling would ideally reflect similar house types and identify a specification by which they could meet the policy targets for energy efficiency and renewable energy (taking into account site conditions). The modelled homes could reflect, for example, a sample of the intended housebuilder's house types that are most likely to be built on the site. This exercise benefits the developer in that it gives an early understanding of the degree of amendment needed to their existing regular specifications. This will then allow them to set up supply chains and benefit from economies of scale in advance of commencing on site; outline proposals typically relate to large-scale developments that can take several years to reach commencement.
- 13.57 The estimated offsetting contribution (if required) for an outline application should be stated in the outline Energy Assessment. These will be subject to a Section 106 agreement, but not paid at the time of the outline application. In that case the offset contribution must be recalculated within the subsequent reserved matters application and paid prior to occupation.

## **Post-occupancy energy monitoring**

- 13.58 The purpose of this element is to reveal the real energy performance of buildings compared to the energy use predicted using Building Regulations calculations. This is not intended as a policing or enforcement mechanism but as means of gathering data for both developers and the Council, to inform both future development and construction work and ongoing policy development. This data will help enable the development of local performance benchmarks.

There is often a significant difference between Building Regulations energy use predictions and reality, because there is currently no nationwide feedback mechanism on actual energy performance for those who consented, designed or built the homes. This is an issue which will need to be improved in order to meet the UK's carbon targets; this policy is intended to contribute to that learning process. Similar policies have been successfully implemented elsewhere for several years.

13.59 At design stage (and therefore planning application stage), it will be important to put metering arrangements in place to enable this data collection, with as little disturbance to occupants as possible (e.g. ideally automated meters and /or meters located in an area accessible by the reporter without entering individual homes or units). Residential data should be aggregated to a level that enables anonymisation before reporting (other locations' similar policies suggest a minimum of 5 homes' data should be aggregated together before reporting). For residential data collection, households' consent should be acquired.

13.60 The use of Heat pumps will be considered as a energy efficiency measure rather than a renewable energy measure. As a measure in aid of this Target Emissions Rate (TER) target, achieve an improvement (reduction) on Part L 2021 Target Fabric Energy Efficiency (TFEE) as follows:

- End terrace:  $\geq 12\%$
- Mid terrace:  $\geq 16\%$
- Semi detached with room in roof:  $\geq 15\%$
- Detached:  $\geq 17\%$
- Bungalow:  $\geq 9\%$
- Flats / apartments:  $\geq 24\%$  (weighted average, whole block).

## Policy EM11 Energy Infrastructure

All new build dwellings (use class C3 and C4) are required to submit an energy statement demonstrating that the development meets the requirements set out in section 1.

### 1. Building Efficiency Part L % improvement:

- a.  $\geq 63\%$  improvement (reduction) on Part L 2021 TER, from energy efficiency measures.
- b. Heat pumps are to be calculated as an energy efficiency measure, rather than a renewable energy measure.

All the above should be calculated using SAP10.2 or an updated version (or the Home Energy Model, HEM, once it is implemented).

### 2. Alternative Compliance

- a.** Positive weight will be given to applicants who can demonstrate the following absolute energy metrics:

- i.** Total Energy Use: 35 kWh/m<sup>2</sup>/year
  - ii.** Space heating demand: 15 kWh/m<sup>2</sup>/year

Performance in these targets must be evidenced using a methodology that accurately predicts buildings' operational energy use. Suitable methodologies include PHPP.

Where a building achieves Passivhaus certification, it will be deemed to have complied with these targets.

- b.** Where this section is demonstrated to have been achieved, it will be assumed that Policy EM11 section 1 is also achieved, as the section 2 targets reflect an improved and preferable standard that more robustly reflects actual energy performance based on energy metrics guidelines.

### **3. Clean energy supply**

- a.** The use of fossil fuels and connection to the gas grid will not be considered acceptable.

In addition to the requirements in sections 1 and 2, positive weight will be given to applicants who can demonstrate the following requirements:

- b.** Major developments (residential development of ten or more dwellings) should include an assessment of decentralised energy networks within the Energy Statement.
- c.** This assessment should outline existing or planned decentralised energy networks in the vicinity of the development and should assess the opportunity to connect to them.
- d.** Where there is an existing or imminently planned network, the general expectation to pursue a connection may be waived if it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised energy networks, or that an individualised solution would result in lower overall carbon emissions than connecting to the decentralised network, taking into account that network's carbon emissions factors.
- e.** For developments of over 10+ dwellings, applicants are expected to identify and address:
  - i.** Current or proposed major heat supply plants, or networks (for example, industrial uses, data centres)
  - ii.** Possible opportunities to utilise energy from waste, or waste heat from an industrial process
  - iii.** Opportunities for private wire electricity supply from renewable sources
  - iv.** Utilisation of natural and engineered heating or cooling systems.

### **4. On-site renewable energy:**

Where viable, all major development should seek to deliver the following on site renewable energy generation standards.

- a. On-site annual renewable energy generation capacity (in kWh) at least equal to the predicted annual total regulated and unregulated energy use (residual energy use in kWh after section 1 has been achieved, plus unregulated energy use).
- b. Where an on-site net zero regulated and unregulated energy balance is not possible or viable<sup>5</sup>, it should be demonstrated that the amount of on-site renewable energy generation equates to >114.9 kWh/m<sup>2</sup> projected building footprint/year.
- c. Where a building in a multi-building development cannot individually achieve the requirements in a. and b above, this shortfall is to be made up across other units onsite before carbon offsetting (section 5) is considered.
- d. Large-scale development (50 residential units or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks, have been explored.
- e. Regulated and unregulated energy use can both be calculated with Part L SAP or BREDEM, but a more accurate method such as PHPP is advised. Any other proposed methods are subject to Council confirmation of acceptability.
- f. The annual renewable energy generation and the annual energy use are whole-building figures, not per-m<sup>2</sup> figures.
- g. Renewable energy output should be calculated in line with MCS guidance for the relevant technology (expected to be PV in most cases).

## 5. Energy offsetting:

- a. Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve an on-site net zero regulated and unregulated energy balance, any shortfall in on-site renewable energy generation that does not match energy use is to be offset via S106 financial contribution, reflecting the cost of the solar PV that will need to be delivered off-site.
- b. The energy offset price will be based on cost of solar PV data from the Department for Energy Security and Net Zero. The price should be revised annually. This is set as a one-off payment, where the annual shortfall in on-site renewable energy generation is multiplied by the energy offset price. This amount does not need to be multiplied by any number of years.

## 6. Reduced performance gap:

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<sup>5</sup> Exceptional circumstances where an on-site net zero energy balance is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (4 storeys or above) or where overshadowing significantly impacts solar PV output

When enacting section 4, developments will need to consider the following requirement:

- a. An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

**7. Smart energy systems:**

When enacting section 4, developments will need to consider the following requirements:

- a. Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.
- b. Where the on-site renewable energy generation peak is not expected to coincide with sufficient regulated energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for energy storage and/or smart distribution systems. The purpose being to optimise on-site or local consumption of the renewable energy (or waste energy) that is generated by the site. Where appropriate, proposals should demonstrate that they have integrated these to optimise these carbon- and energy-saving benefits and minimise the need for grid reinforcements.
- c. This may include smart local grids, energy sharing, energy storage and demand-side response, and/or solutions that combine elements of the above.

**8. Post-occupancy evaluation:**

- a. Large-scale development (50 units or more) should monitor and report total energy use and/or renewable energy generation values on an annual basis. An outline plan for the implementation of this should be submitted with the planning application. The monitored in-use data are to be reported to the local planning authority for 5 years upon occupation.

## **Reducing operational carbon in new build non-residential development**

13.61 Sections 1 - 4 of Policy EM12 must be addressed at design and post-completion stages, to ensure that the development has been built to intended standards. Post-completion resubmission of the original energy statement including energy performance calculations, informed by the relevant tests to systems and fabric, should be required as a condition as part of the planning application process. Compliance with sections 6 and 8 should also be demonstrated post-

completion through planning condition. Sections 1 - 5 should be demonstrated at planning application stage through the submission of an energy statement, alongside associated output reports from energy modelling software (e.g. Simplified Building Energy Model (SBEM)).

## **Compliance with section 1 target emission rates (TER) reductions**

13.62 TER reduction targets are not limited to delivery solely through energy efficiency measures. There could be an element of clean energy supply or renewable energy measures included in them. However, further renewable energy will be needed to subsequently meet the requirement of section 4; applicants are advised to pursue energy efficiency measures as far as feasible in the first instance in pursuit of section 1, so that section 4 renewable energy requirements (to match 39% 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. The Council therefore expects applicants to demonstrate that energy efficiency has been maximised to the greatest extent feasible and viable, before renewable energy generation and / or offsetting is provided.

13.63 Applicants should be aware that in 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 improvements will be made simply by switching from a gas or oil boiler to a heat pump or other all-electric or otherwise low-carbon heat system. However, Part L does define an assumed efficiency rate for each heating system type. Therefore, TER improvements can be made through selecting a heating system that is more efficient than Part L 2021's notional efficiency for that heating type.

## **On-site renewable energy target**

13.64 As with the residential approach, first calculate the total predicted annual energy use in kWh for all proposed new buildings (whole buildings, regulated and unregulated, after all the measures proposed in the application towards compliance with section 1). This can be modelled using SAP, BREDEM (the methodology on which SAP is based), or PHPP. PHPP is the preferred model due to its accuracy, to avoid SAP's inaccuracies at predicting actual energy use in operation (SAP underestimates space heat demand, overestimates unregulated energy, and may overestimate hot water use). The Council may later take a view on whether the incoming HEM is a suitable method for energy use prediction when the final form of HEM is available.

13.65 Second, calculate the annual renewable energy generation for whole site in accordance with the MCS guidance for the relevant renewable energy

technology (anticipated to be solar PV in most cases as this is typically the most suitable technology in an urban setting). This does not have to be exclusively on the buildings themselves and can include provision of new standalone renewable energy installations within the site. The figure does not include renewable heat delivered by heat pumps, as that would count instead towards section 1.

- 13.66 Third, deduct the annual renewable generation from the annual energy use. The result should be zero or less. If the result is not zero or less, explore how to provide more on-site renewable energy (for example through an adjustment to roof orientation, and ensuring PV area provision has been explored up to at least equivalent of 70% of projected building footprint including roof overhangs and with reasonably efficient panels available on the market).
- 13.67 If it proves unfeasible to increase renewable energy generation on-site to result in an annual balance of energy generation with energy use, then divide the total annual renewable energy generation by the building footprint. This result should be at least 114.9kWh. If this is impossible, provide evidence as to why this is not possible even with a PV area equivalent to 70% of projected building footprint and reasonably efficient panels available on the market.
- 13.68 Finally, calculate the residual energy demand (whole building, not per m<sup>2</sup>) for all proposed new buildings after all measures proposed in sections 1 and 4, then proceed to use this figure to calculate the required amount of offsetting provision in section 5.

## **Assured Performance Processes for energy performance**

- 13.69 Regarding assured performance processes, in addition to those mentioned in SCC1 (paragraph 4.23), there is also one additional method for non-residential development: National Australian Built Environment Rating System (NABERS) UK129 (administered by Chartered Institution of Building Services Engineers (CIBSE)). NABERS is currently only available for offices but is likely to extend to other building types in future.

## **Offsetting**

- 13.70 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. 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 this 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 justification for Policy SCC1 includes further information on the available national guidance on

cost of solar PV, which achieve economies of scale with greater amounts of PV installation. The degree of flexibility available will depend on the unique scheme characteristics and evidence submitted to the Council about what can 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 (such as for healthcare, education, or similar).

Please see also the supporting text for Policy EM11 regarding:

- a. calculating renewable energy provision and offset payments,
- b. applicability to outline applications, and
- c. assured performance processes.

## **Policy EM12 Reducing operational carbon in new build non-residential development**

All new build non-domestic development over 1,000sqm of non-residential floorspace including C1, C2 and C2a and C5 are required to submit an energy statement demonstrating that the development meets the following requirements:

1. Building Efficiency Part L % improvement
  - a. % improvement on Part L 2021 TER (or equivalent reduction on future Part L updates), through on-site measures as follows:
    - Offices:  $\geq 25\%$
    - Schools:  $\geq 35\%$
    - Industrial buildings:  $\geq 45\%$
    - Hotels (C2, C5) and residential institutions (C2, C2a):  $\geq 10\%$
    - Other non-residential buildings:  $\geq 35\%$
2. Energy metrics guidelines
  - a. Positive weight will be given to applicants who can demonstrate the following absolute energy metrics:
    - Total Energy Use: 65 kWh/m<sup>2</sup>/year
    - Space heating demand: 15 kWh/m<sup>2</sup>/year.
  - b. Employing absolute energy metrics reduces the amount of solar PV required under policy element 3 below for an on-site net zero balance of regulated energy. Applicable methodologies to calculate this include CIBSETM54 and the Passivhaus Planning Package. At present, the Part L calculation method (SBEM) is not considered suitable as it does not provide accurate predictions of a building's actual energy use.
  - c. must achieve at least 4 credits in the Wat01 Measure for water in the BREEAM New Construction standard.

### 3. Clean energy supply

- a. The use of fossil fuels and connection to the gas grid will not be considered acceptable.
- b. Major non-residential developments (over 1,000sqm of non-residential floorspace including C1, C2 and C2a and C5) should include an assessment of decentralised energy networks within the Energy Statement.
- c. This assessment should outline existing or planned decentralised energy networks in the vicinity of the development and should assess the opportunity to connect to them unless it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised energy networks.
- d. For developments over 10,000sqm of non-residential floorspace, applicants are expected to identify and address:
  - i. Current or proposed major heat supply plants, or networks (for example, industrial uses, data centres)
  - ii. Possible opportunities to utilise energy from waste, or waste heat from an industrial process
  - iii. Opportunities for private wire electricity supply from renewable sources
  - iv. Utilisation of natural and engineered heating or cooling systems.

### 4. On-site renewable energy

Where viable, all major development should seek to deliver the following on site renewable energy generation standards.

- a. On-site annual renewable energy generation capacity to at least equal predicted annual total regulated energy use (residual energy use after policy element 1 has been achieved).
- b. In buildings subject to Part L's requirement for energy forecasting, that forecasting should be the source of the 'annual total regulated energy' figure. Where an on-site net zero regulated energy balance is not possible or viable<sup>6</sup>, it should be demonstrated that the amount of on-site renewable energy generation equates to >114.9 kWh/m<sup>2</sup> projected building footprint/year. Where a building in a multi-building development cannot individually achieve the requirements of Policy EM11 (3), this shortfall is to be made up across other units on-site before carbon offsetting (Policy EM11 (5) is considered.
- c. Large-scale development (5000 m<sup>2</sup> floorspace) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks have been explored.

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<sup>6</sup> Exceptional circumstances where an on-site net zero energy balance is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (4 storeys or above) or where overshadowing significantly impacts solar PV output.

## **5. Energy offsetting**

- a. Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve an on-site net zero regulated energy balance, any shortfall in on-site renewable energy generation that does not match regulated energy use is to be offset via S106 financial contribution, reflecting the cost of the solar PV delivered offsite.
- b. The energy offset price will be based on cost of solar PV data from the Department for Energy Security and Net Zero. The price should be revised annually. This is set as a one-off payment, where the annual shortfall in on-site renewable energy generation is multiplied by the energy offset price.

This is set as a one-off payment, where the shortfall in annual on-site renewable energy generation is multiplied by the energy offset price.

## **6. Reduced performance gap**

- a. An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

## **7. Smart energy systems**

- a. Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.
- b. Where the on-site renewable energy generation peak is not expected to coincide with peak onsite energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for energy storage and/or smart distribution systems. The goal is to optimise on-site or local consumption of the renewable energy (or waste energy) that is generated by the site. Where appropriate, proposals should demonstrate that they have integrated these to optimise carbon- and energy-saving benefits and minimise the need for grid reinforcements.

## **8. Post-occupancy evaluation**

- a. Large-scale development (over 5000 m<sup>2</sup> floorspace) should monitor and report total energy use and renewable energy generation values on an annual basis. An outline plan for the implementation of this should be submitted with the planning application. The monitored in-use data are to be reported to the local planning authority for 5 years upon occupation.

## Overheating in new buildings

- 13.71 Compliance with sections 1 and 2 of the policy should be demonstrated within an energy statement at planning application stage, with supporting output reports from CIBSE assessments.
- 13.72 Although mechanical ventilation is listed down the cooling hierarchy as part of section 1, the use of mechanical ventilation with heat recovery (MVHR) should not be viewed negatively as this may assist compliance with operational energy policies. However, MVHR should have the ability to bypass the heat recovery function in periods of warmer weather in order to support the overheating risk mitigation goal.
- 13.73 Overheating assessments are a requirement of Building Regulations Part O (for residential), and is a common measure performed in the design of good-quality non-residential new buildings especially where a BREEAM rating is sought. Therefore, it should not inflict any significant additional burden on the development industry to deliver these policy requirements.

### Policy EM13: Overheating in new buildings

All new build residential and non-residential buildings must meet the following requirements:

#### 1. Cooling hierarchy:

- a. Demonstrate that overheating risk measures have been incorporated in accordance with the cooling hierarchy:
  - i. Minimise internal heat generation through energy efficient design.
  - ii. Reduce the amount of heat entering the building in summer using:
    - Building orientation;
    - Shading;
    - Albedo;
    - Fenestration; and
    - Insulation.
  - iii. Manage heat within the building through exposed internal thermal mass and high ceilings.
  - iv. Passive ventilation.
  - v. Mechanical ventilation.
  - vi. Active cooling measures.

#### 2. Overheating Assessment

- a. Residential development should complete CIBSE TM59 overheating assessment as their route to compliance with Building Regulations Part O. The simplified Part O route will not be considered acceptable. Non-residential development should complete CIBSE TM52 overheating assessment.

## **Embodied carbon and waste**

13.74 Compliance with sections 1, 2 and 3 of the policy are to be demonstrated within an energy statement. If applicable, output reports for section 4 should be submitted alongside an energy statement. For section 5, it is accepted that the level of detail will be lower the smaller the development proposal.

13.75 The aim is to ensure applicants explore the topic of embodied carbon, but without setting requirements that are impractical or excessively costly at small sites. Points of narrative encouraged in the fulfilment of section 5 could include, but are not limited to:

- Reuse of existing features and materials on site, where present
- Design for material efficiency (reducing the amount of material needed) such as through structural design or use of space and layouts to avoid unnecessary material use.
- Substitution of low-embodied-carbon materials (such as timber) in place of higher-carbon materials (such as steel, aluminium, and unadulterated Portland cement)
- Material sourcing for reduced 'product miles' or from manufacturers with low-carbon manufacturing credentials
- Construction processes that reduce the typical rates of material wastage.

13.76 Proposals for new development of 1 or more homes or  $\geq 100\text{m}^2$  non-domestic floor space, but below the size thresholds for embodied carbon reporting and targets as noted above, are encouraged to include a general narrative on the options that have been considered to minimise embodied carbon of the proposed development.

## **Policy EM14 Embodied carbon and waste**

Residential and non-residential buildings (thresholds given below) must meet the following requirement:

### **1. Embodied carbon reporting**

- a. All major new residential (10 dwellings or more) and non-residential (1000 m<sup>2</sup> 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.

## 2. Limiting embodied carbon

- a. All large-scale major development (50 dwellings or more; 5000 m<sup>2</sup> non-residential floor space or more) is required to limit embodied carbon (RICS/BS 15978 modules A1 – A5) to 600 kgCO<sub>2</sub>e/m<sup>2</sup> GIA.

## 3. Building end-of-life

- a. All new buildings are to be designed to enable easy material re-use and disassembly, subsequently reducing the need for end-of-life demolition.

## 4. Demolition audits

- a. All major development that contains existing buildings/structures to carry out a pre-redevelopment and/or pre-demolition audit, following a well-established industry best practice method (e.g. Building Research Establishment (BRE)).

## Noise

13.77 As with other types of pollution, noise pollution has the potential to impact adversely on environmental amenity and biodiversity. Particularly significant, however, are its impacts, both direct and indirect, on health and wellbeing, for instance through loss of sleep or other negative health externalities such as stress that can be caused by exposure to sustained noise over a longer term. This policy seek to address and mitigate these impacts.

13.78 In terms of noise mitigation in assessing such schemes for either a noise-generating or noise sensitive development, account should be taken of:

- The location, design and layout of the proposed development
- Land levels and existing topographical features
- Existing levels of background noise;
- Hours of operation and servicing (where relevant);
- Potential for cumulative impact with nearby noise-generating uses;
- Measures to reduce noise within the development to acceptable levels, including external areas where possible; and
- The need to maintain adequate levels of natural light and natural ventilation to habitable areas of the development.
- The need to ensure that where ventilation is required in areas of poor air quality, measures do not impact the amenity of end users where open windows may be inappropriate.
- The need to ensure mitigation schemes can be satisfactorily verified and adequately maintained for the life of the development.

## **Policy EM15 Noise**

- 1.** Development which could result in an unacceptable impact on amenity, biodiversity or the surrounding environment by reason of noise pollution and / or increased levels of general disturbance will only be permitted if a noise assessment and associated scheme of mitigation (if necessary) demonstrates that noise and / or general disturbance can be adequately controlled through design, planning conditions or other means of mitigation.
- 2.** Proposals for uses which are sensitive to noise will not be permitted close to existing or proposed potentially noise polluting uses unless it can be demonstrated that adequate mitigation measures can be provided to ensure adequate levels of amenity can be provided for future occupiers and the existing potentially noise polluting uses will not be prejudiced by the development proposed.
- 3.** Development will not be permitted if mitigation cannot be provided to an appropriate standard with an acceptable design.

## 14. Coventry City Centre

### Key evidence

Area Action Plan Background Paper 2024

One Coventry Plan 2022

Coventry City Council Climate Change Strategy

### Context

- 14.1 Coventry City Centre was the focus of the City Centre Area Action Plan which was adopted in 2017 alongside the Local Plan. As part of the review, it was assessed which parts of the AAP were out of date, which parts duplicated core Local Plan policies, and which were up to date and would add local detail. This chapter therefore sets out locally specific policy for the city centre. Further information about the review of the AAP is set out in the City Centre Area Action Plan Background Paper.
- 14.2 The city centre boundary is defined within Appendix 9(d), alongside a 'transitional area' surrounding the centre. This transitional area, outside of the defined city centre is acknowledged to be informed by both the contexts of the City Centre and those areas beyond. Any development within this area should therefore make reference to both policy contexts, whilst density guidance (policy H9) and parking standards (Appendix 6) also reference the identified transitional area to the City Centre Boundary.

### City Centre Development Strategy

- 14.3 The overall aims of the development strategy (Part A) accord with the key aims visions and objectives of Coventry City Council.

#### **Policy CC1 (Part A) Coventry City Centre – Development Strategy**

The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture.

This will be achieved by:

- Enhancement of its position as a focus for the entire sub- region and as a national and international destination to live, work and play;
- Enhancement of its retail and leisure offer to strengthen the city's sub-regional role;
- Provision of high quality office space;

- Becoming a hub for education;
- Including a variety of places to live which cater for different needs;
- Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;
- A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;
- Accessibility for all;
- Providing an attractive and safe environment for pedestrians, cyclists and motorists;
- Provide a high-quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;
- Being a gigabyte city that offers high speed Wi-Fi and broadband facilities throughout the city centre;
- High quality sustainable built design;
- Continuing to develop a vibrant and attractive night time economy;
- Providing opportunities to improve health and wellbeing;
- Continuing to support greater integration of the university within the wider city centre
- Respecting key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch in line with the Tall Buildings Design Guide and View Management Framework SPD
- Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible; and;
- Contributing to the key aims, vision and objectives of Coventry City Council.

## City Centre Green and Blue Infrastructure

14.4 Part B sets out the Councils expectations around considerations of Green and Blue infrastructure within the city centre. Similar to many urban centres, the availability of such environments within the urban core can become constrained and as such the policy is seen to remain a necessary policy objective in the delivery of a high quality and resilient City Centre. The necessity for the policy

is also seen to be further reinforced with the anticipated growth of residential living in the city centre.

- 14.5 The policy addresses a number of environmental issues which are specific to the City Centre and therefore justify a standalone policy, including the considerations of development adjacent to the central ring road.

### **Policy CC1 (Part B) – Green and Blue Infrastructure**

- a. New development will be expected to maintain the quantity, quality and functionality of existing green and blue infrastructure. In line with the city's Green Space Strategy and Local Flood Risk Management Strategy, development proposals should enhance blue and green infrastructure, and create and improve linkages between the areas. Any development which is likely to adversely affect the integrity of a blue or green corridor will be required to be robustly justified and where appropriate, mitigation measures put in place. Development shall support meeting the objectives of the Severn River Basin Management Plan through ensuring that no deterioration of the River Sherbourne or its tributaries shall occur that may result in it failing its objectives under the Water Framework Directive.
- b. Development adjacent to the Ring Road should maximise all opportunities to develop the greening of vertical surfaces as far as reasonably possible. Opportunities to add greenery to areas adjacent to the Ring Road will be encouraged.
- c. Trees that contribute towards public amenity shall be retained and protected unless they are of poor quality, have a short life expectancy (less than 10 years), are dangerous, or the benefits of removing the tree significantly outweighs the harm that would be caused by its removal. Where trees are lost, replacement planting must be provided to a commensurate value to that which is lost.
- d. Introduction of new, accessible green spaces in the City Centre will be encouraged. Proposals which positively contribute toward the open space objectives of Coventry City Council will be encouraged.

### **City Centre Drainage and Flood Risk**

- 14.6 Part C relates to Drainage and Flood Risk. The core of the City of Coventry is located along the route of the River Sherbourne, this route being largely culverted and unavailable for access and viewing. The Council maintains an aspiration to make this watercourse available for view to capitalise upon the opportunity for environmental quality enhancements. Consideration of drainage and flood risk issues are key throughout the administrative area: the policy reinforces this important consideration alongside the aspirations of de-

culverting the river Sherbourne and acknowledging the that the increased levels of impermeability found in Urban Centres reinforce this important consideration and is to be read in conjunction with Policy EM4.

### **Policy CC1 (Part C) Drainage & Flood Risk**

- a. Development shall be designed in line with the requirements of policy EM4 and located to minimise the risk of flooding and if permitted development, be resilient to flooding. The opportunity must be exercised to maximise the absorption of surface water run-off by the ground. Sustainable Drainage methods shall be incorporated into new developments including treatment for water quality. Such provisions should consider opportunities to reflect the alignment of the River Sherbourne and/or its tributaries.
- b. When development occurs, a Flood Risk Assessment will need to be produced to appropriately consider the risk of flooding from all sources.
- c. When development occurs, it must consider the evidence in the Local Flood Risk Management Strategy, Surface Water Management Plan and Strategic Flood Risk Assessment. This includes all sites being treated as a Greenfield site when calculating permissible discharge rates in line with Policy EM5 of the Local Plan.
- d. When development is proposed it should utilise water use reduction systems such as grey water harvesting to reduce the water usage within the proposed developments.
- e. 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.

### **City Centre Environmental management**

Part D. Environmental management policies are a key consideration in the creation of high quality environments, and may be considered of heightened importance within urban areas where higher density development takes place and close proximity interfaces between uses. In line with this it is assessed that policy this policy ensures such considerations are carefully considered in development proposals in the City Centre. In line with the integration of City Centre policies into the core local plan, minor referential wording updates are proposed to ensure that the policy is read across other relevant policy areas within the local plan

## **Policy CC1 (Part D) – Environmental Management**

New development must be designed to minimise environmental impact within the city centre and ensure that any impacts of pollution are appropriately considered and mitigated. In doing so new development schemes (including conversions and changes of use where appropriate) must ensure that:

- a.** All construction and demolition schemes adhere to a construction environmental management plan which must be submitted to and approved by the council before works commences. The CEMP must specify how the developer will mitigate noise and dust emissions from the works.
- b.** All opportunities to connect to heat line or implement renewable energy generation have been explored and included as part of new development unless shown to be unviable or inappropriate.
- c.** Ground contamination needs have been assessed and remediated using the Environment Agency Model Procedures for the Management of Land Contamination.
- d.** Proposals for site investigation and remediation schemes (where appropriate) utilise appropriate risk assessment and are approved by the Council in advance of development. Such measures should ensure that sites are ‘fit for purpose’.
- e.** New residential and commercial development schemes and the introduction of fixed plant machinery have been designed to meet internal and external noise levels specified in BS4142 and BS8223, or subsequent replacement standards.
- f.** Appropriate odour extraction systems are incorporated where the sale / preparation / consumption of food takes place within the relevant buildings. Appropriate consideration has been given to the West Midlands LETC Air Quality guidance (or replacement guidance) and necessary mitigation measures incorporated into schemes.
- g.** Have regard to all other relevant policies within the Local Plan.

## **City Centre Character areas**

Part E relates to a series of City Centre Areas which are distinct in terms of their character, both in terms of reflecting the current situation, and in terms of changes to character which will continue to take place during the forward plan period such as the recently consented City Centre South regeneration scheme. The character areas have been defined to reflect forthcoming expected change in the City

Centre. Additionally the nature of uses in the City Centre has undergone significant evolution in the last plan period as the economics of City Centres continues to evolve on a national level, therefore the character areas reflect their existing and foreseeable urban character. The Character Areas are mapped in Appendix 9(f).

This policy should also be read in conjunction with Density Policy H9 in that an area of higher density urban character is seen to existing in the periphery to the defined City Centre. The plan, read as a whole, proposes to be responsive to this character by incorporating elements of city centre policy into core plan policy. A transitional area is therefore identified beyond the defined City Centre boundary, acknowledging this periphery character area.

Whilst City Centre policies remain applicable within the defined City Centre boundary, development proposals within the transition zone should seek to acknowledge this 'transitional area' and consider how planned development may positively interface with the adjacent character areas within the defined City Centre

### **Policy CC1 (Part E) – City Centre Character Areas**

- All Development within the City Centre should reference the individual character area of its location and deliver high quality, contextually responsive proposals.
- All development proposals within, or with the setting of, Conservation Areas will only be considered acceptable if they demonstrate that they preserve and enhance the historic environment of the area and are in adherence with the policies of the respective Conservation Area Appraisals and Management Plans.

#### **The Friargate Area**

- a. Development within this area should deliver high quality office and residential development, alongside a mix of uses within its highly sustainable location. Uses considered to be acceptable include:
  - Office Development
  - High quality City Centre Residential Dwellings
  - Leisure and recreation uses, including hotels;
  - Social and community uses;
  - Provisions for public transport infrastructure.
- b. Improvements to and expansion of the Coventry Railway Station will be supported so long as it does not negatively affect heritage assets.

### **Cathedral and Cultural Area**

- a. Development in areas adjoining Conservation Areas should enhance their setting and improve linkages between them and other areas of the city centre.
- b. Development proposals must reference inter-relationships to heritage assets and ensure the primacy of Coventry Cathedral is retained in townscape.
- c. Development proposals must fully explore opportunities to reinforce the cultural offering of the City.

### **Civic Area**

- a. New development within the Civic Area must have regard to its historic characteristics of public service provision. As such, the following uses are encouraged :
  - High Quality Residential Dwellings
  - Social and community uses;
  - Leisure and recreation uses;
  - Educational uses, including new university and research provisions;
  - Office use;
- b. Other commercial activities will be supported where they support the provision of active frontages within a mixed use development.
- c. The provision of new retail development is unlikely to be supported within the Civic Area unless it can be demonstrably shown to form an integral part of a mixed-use scheme.
- d. Opportunities to expand the programme of public realm improvements will be supported

### **Far Gosford Street Area**

- a. New developments, changes of use and conversions within the Far Gosford Street Area must respect and reflect the area's historic character. As such all development proposals, including applications for signage and the provision of new and improved parking (for cars and cycles), within the area will only be considered acceptable if they demonstrate that they respect the historic environment of the area.
- b. To support the local centre designation a mix of creative industries, employment, residential and social and community uses will be supported within the Far Gosford Street Area.

- c. The use of upper floors of buildings for residential or office use will be supported and encouraged providing that appropriate noise insulation is included to ensure that the use is compatible with ground floor commercial activity.
- d. Opportunities to enhance the setting of the exposed River Sherbourne within this Area through improvements to green infrastructure will be encouraged. This should include opportunities to improve wider green linkages beyond the city centre boundary, especially towards the Heritage Park at Charterhouse.

#### **Stoney Stanton Road Area.**

- a. New developments within the Stoney Stanton Road Area must have regard to its established character; respond to the environmental issues associated with its proximity to the Ring Road and deliver high quality buildings and public space which reflect this areas position as a gateway to the city centre.
- b. All prospective developments should:
  - reflect and enhance the area's character through mixed-use developments;
  - improve and introduce high quality buildings;
  - Promote active travel and ensure it becomes easier and safer to move within the area and into adjoining parts of the city centre
  - Mitigate the negative environmental impacts of the Ring Road;
- c. The conversions of existing buildings, where appropriate, and the development of small infill opportunities for new residential developments will be encouraged and supported in principle.

#### **Corporation Street Area**

- a. All development proposals within the Spon Street Conservation Area, including applications for signage, will only be considered acceptable if they demonstrate that they respect the historic environment of the area.
- b. Spon Street will be encouraged as a suitable and attractive location for specialist and independent retailers. In order to protect the availability of property for such use, further hot food takeaways will be resisted.
- c. Development must be of high-quality design that both relates well to the modern Belgrade Plaza development whilst ensuring the setting of adjacent listed buildings and Spon Street Conservation Area is preserved
- d. Opportunities to improve the linkages into the precinct area will be encouraged from Corporation Street, Spon Street and Belgrade Plaza

- e. Opportunities to improve the linkages into the Corporation Street Area from the West will be encouraged.

### **Mixed Use Core**

Including the Primary Shopping Area

- a. The primary shopping area is defined as per core Retail policy R2.
- b. Other proposals that would introduce new town centre uses within the PSA will be encouraged and supported where they do not undermine or conflict with this or any other policy.
- c. Opportunities for new residential provision above new or existing ground floor town centre uses will be supported with a view to supporting the vitality and viability of the city centre as a whole.
- d. Opportunities to reinforce the original design concept of the Gibson plan and the precinct cross will be encouraged and supported
- e. Development proposals should reference the variety of typologies found in the surrounding context, including the heritage assets of the precinct area.

### **Parkside Area**

- a. Development proposals within the Parkside area, should support the hi-tech character that has been developed within this part of the city centre. As such, the following uses will be acceptable:
  - Hi-Tech industry use;
  - Research and Development activity;
  - Other Education facilities;
  - Residential provision;
  - Leisure and recreation uses;
  - Social and community uses;
  - Office use;
  - Car parking;
- b. Improvements in pedestrian connections from the area around Junction 5 toward London Road Cemetery to the South will be encouraged

### **University and Enterprise Area**

- a. Within the University and Enterprise Area, proposals for redevelopment, refurbishment, extension or conversion of buildings for the following uses will be supported subject to high quality building and landscape design:

- i. Education and faculty buildings;
  - ii. University administrative facilities;
  - iii. Supporting ancillary sport, recreation, retail and maintenance facilities;
  - iv. Research facilities;
  - v. Residential provision including student accommodation.
- b.** Proposals to bring the Grade I listed Whitefriars Monastery into appropriate and regular use will be strongly supported subject to that use not having a detrimental impact upon the architectural and historic interest of the building and surrounding public realm. Proposals shall respect the design unity of this part of the University and Enterprise area.
- c.** University Square shall remain as an attractive public square at the interface of Coventry Cathedral, the Herbert Art Gallery and Museum and Coventry University.

### **Northern Regeneration Area**

- a.** Proposals supporting the aims of mixed-use redevelopment of the Area will be encouraged.
- b.** The area will be primarily promoted for new residential development in a range of types and tenures although a range of other uses will be acceptable subject to conformity with other parts of this AAP. These include:
- Office;
  - Retail and commercial;
  - Social, community and leisure uses;
  - Education uses (including those linked to the university);

Such uses should contribute towards active frontages at ground floor level.

- c.** Green and blue infrastructure should form an integral part of all development proposals within the area. This should include the consideration of deculverting where possible and viable.
- d.** New development opportunities should not conflict with any other policies within this Local Plan.
- e.** Swanswell Pool is of historic importance to the local area and the city centre as a whole. Opportunities to expand the park and enhance its quality will be supported. This should include opportunities to improve its linkages to the wider city centre.

- f.** Proposals for the redevelopment of White Street Coach Park will be encouraged, where they are linked to appropriate amendments to Ring Road junction 2

#### **The Warwick Row Area**

- a.** Proposals for limited and sympathetic infill development in the Warwick Row area will be encouraged and supported where appropriate.
- b.** Applications for conversions or changes of use will be considered on the basis of their relationship with adjoining buildings and uses. Where appropriate, proposals should complement existing styles and designs of adjoining buildings.
- c.** Proposals should enhance the character and quality of the local environment and be compatible with other Local Plan policies.
- d.** Greyfriars Green will continue to be protected as a conservation area and an important 'green' asset to the city centre. Any development proposals that would erode the character of the Green and damage the setting of the listed buildings will not be accepted.

# 15. Infrastructure Delivery, Implementation and Monitoring

## Context

- 15.1 The delivery of infrastructure to support the growth identified in the Local Plan will require a partnership approach. As a Local Authority, Coventry City Council has a number of responsibilities and obligations it has to meet and therefore has a pivotal role as an infrastructure and service provider. The roles the Council currently fulfils include:
- Local Planning Authority
  - Local Highway Authority
  - Local Education Authority
  - Waste and Minerals Authority
  - Strategic Housing Authority
  - Social Care Service Provider
  - Lead Local Flood Authority
  - Public Health
- 15.2 The Council has an important role to play in setting the level of and securing developer contributions to deliver the necessary infrastructure to support development. The Council will work closely and in partnership with a number of organisations across both the public and private sector to achieve this. As a major landowner within Coventry, the Council will play a leading role in bringing sites forward for development.
- 15.3 There are close links between Coventry and the rest of the West Midlands and Warwickshire. This includes Local Authorities, and the West Midlands Combined Authority, and ongoing discussions have taken place on a number of key issues, including housing and economic growth. The Council will work with these neighbouring authorities and organisations to ensure that cross boundary infrastructure issues are addressed to help deliver growth and development in the area.
- 15.4 Organisations in the public sector as well as other agencies are also responsible for meeting their statutory obligations and responding to growth.
- 15.5 The Council will continue to work closely with partners to maximise funding opportunities and to identify the most effective and timely delivery mechanisms for the necessary infrastructure.
- 15.6 The Infrastructure Delivery Plan along with explanatory text is contained at Appendix 7

## **Policy IM1: Developer Contributions for Infrastructure**

- 1.** Development will be expected to provide, or contribute towards provision of:
  - a.** Measures to directly mitigate its impact and make it acceptable in planning terms;
  - b.** Physical, social and green and blue infrastructure to support the needs associated with the development
- 2.** Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Plan.
- 3.** The Council will, where appropriate, seek to secure 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 of development and its potential impact on the site and surrounding area. The cumulative impact of developments will also be taken into account.
- 4.** Developer contributions will contribute towards strategic infrastructure required to support the overall development in the Plan as defined in the Infrastructure Delivery Plan.
- 5.** Where site specific issues generate viability concerns, applicants should discuss these with the Council at the earliest possible stage in the development process. Proposals that are unable to comply with the Plan's policies on viability grounds must be accompanied by a detailed Viability Assessment.
- 6.** The Council will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan to ensure an up to date evidence base regarding infrastructure requirements and costs is maintained.

## Coventry City Council Local Plan Review

### Erratum statement

- 1) The Regulation 19 Proposed Submission Document is missing Policy DS4 (Part C) which relates to Keresley SUE Specific Masterplan Principles. This should have been included on page 23 /24 after Paragraph 3.25 of the [Proposed Submission Document](#). The proposed policy change is minor as set out in the Guidance Note <https://www.coventry.gov.uk/downloads/file/44128/guidance-note-local-plan-proposed-policy-updates-and-changes>

Policy DS4 (part C) should read:

#### **Keresley SUE Specific Masterplan Principles**

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

- i) Incorporate the recommendations of the Council's SUE Design Guidance SPD;
- ii) Ensure that the planned Local Centre is in accordance with Policy R1;
- iii) Ensure the new defensible boundaries to the Green Belt are clearly supported on the western side of the site to Tamworth Road and to the north around Thompsons Lane;
- iv) Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall Brook. This corridor should run north-south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south east; and
- v) Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site. This should include:
  - a. The provision of a new Link Road in accordance with Policy H2. The Link Road should be operational to traffic prior to the full completion of all development components within the SUE;
  - b. The delivery of the Link Road should not be to the detriment of ProLogis Park; and
  - c. The management of the existing highway junctions at Bennetts Road, Tamworth Road, Fivefield Road, Sandpits Lane, Thompsons Lane, Long Lane and Watery Lane to ensure they continue to operate in a safe and appropriate way.

- 2) The Regulation 19 Proposed Submission Document contains policy R1, points 2 and 3 incorrectly within the table of policy R1 point one 'New Eastern Green Local Centre'. The proposed policy change is minor, and listed within the Regulation 19 Guidance Note
- <https://www.coventry.gov.uk/downloads/file/44128/guidance-note-local-plan-proposed-policy-updates-and-changes>