

# Coventry Local Plan Review

## Regulation 19

### Proposed Submission (Publication) Stage Representation Form

(guidance note below)

Ref:

(For official use only)

Name of the Plan  
to which this  
representation  
relates:

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

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

Please refer to the following data protection/privacy notice:  
[www.coventry.gov.uk/planningpolicyprivacynotice](http://www.coventry.gov.uk/planningpolicyprivacynotice)

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

This form has two parts:

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

**Part B** – Your representation(s).

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

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## Part A

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### 1. Personal Details\*

### 2. Agent's Details (if applicable)

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

Title	<input type="text" value="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Jane"/>	<input type="text"/>
Last Name	<input type="text" value="Chatterton"/>	<input type="text"/>
Job Title	<input type="text" value="Proper Officer"/>	<input type="text"/>
(where relevant)		
Organisation	<input type="text" value="Allesley Parish Council"/>	<input type="text"/>
(where relevant)		
Address Line 1	<div></div>	<input type="text"/>
Line 2		<input type="text"/>
Line 3		<input type="text"/>
Line 4		<input type="text"/>
Post Code		<input type="text"/>
Telephone Number		<input type="text"/>
E-mail Address		<input type="text"/>

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

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Name or Organisation: Allesley Parish Council

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

Paragraph  Policy

4. Do you consider the Local Plan Review is:

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

Please tick as appropriate.

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

APC cannot find where to submit their comments to the Local Plan so have included them here:

**General comments:**

1. Further to detailed assessment work which considered how development needs might be accommodated (contained in the Background Paper on Growth Needs, the Housing and Employment Background Papers and the HELAA), no further releases of Green Belt are proposed in the Coventry Local Plan which would require a revision of GB1. The only changes to GB1 are therefore proposed to be as follows:
  - To split the policy into Green Belt (GB1) and Local Green Space (new policy GB3)
  - To ensure policy wording reflects that of national policy.
  - To remove the list of sites which were listed in GB1: this is not necessary now as the designations were made through the adoption of the 2017 Plan and these are now reflected on the adopted Policies Map. No changes to these designations are proposed through the Local Plan Review.

2. In terms of future Green Belt policy, at the time of writing the Background Paper the Government were proposing to introduce a new designation of "Grey Belt" which could potentially accommodate new development where a series of tests were met. Notwithstanding this, the principles of 'brownfield first' and making 'effective and efficient use of brownfield' looked set to remain.
3. Requirement for land south Parish side of the A45. We believe this is the historic reference to the land required to "bring forward" the Eastern Green SUE, by building the road access over the bridge and associated roundabout and slip roads. This land was NOT in Coventry CCs initial request to remove land for the development from the Greenbelt. Further creep our way was discussed at the Government Planning Inspector's meetings, however, Colin Knight and other CCC Officers stated there were no plans to either spur off the new roundabout with a new road running north towards Keresley/M6 or bring further land forward for housing etc. The large (now remote and isolated field adjacent north of the roundabout also bordered by Brick Hill Lane and Oak Lane is owned by the same landowner who sold the land for the SUE. We understand that the same developer as the SUE has the first option on this land.
4. Re Greenbelt/protected green spaces. It is our understanding that the "protected green spaces" was an enhancement to isolated pockets of non Greenbelt land, not a higher level of protection for Greenbelt. If this is not correct then we would request for renaming/redesignation.
5. Eco protection and mitigation. Elsewhere in the Plan it transpires that even areas of high ecological importance CAN be built on if there is a strong enough case, with the developers, simply paying to offset the eco damage caused at a specific site elsewhere (if biodiversity gains cannot be made onsite)
6. As the plan covers land use and housing over the next decade plus, Allesley parish Council strongly hope, desire and intend to redraw our Parish boundaries and become a part of North Warwickshire should be formally recorded and included in the review. The City Council need to be aware that there is a strong possibility that residents will vote for change.
7. Our concern, as mentioned in the supporting material of the recent building surge and now oversupply of purpose built student accommodation in the City. It is noted that providers are offering incentives to students and less desirable accommodation (due to location or quality) are under occupied to the point the owners may be considering exiting the student market and repurposing the units.
8. We disagree with the Council's transport proposals, particularly their unrealistic assumptions regarding the modal shift expected within the City. Just because the City Council believe that more people will take up cycling does not mean that it is appropriate for everyone. Having a car is more than just aspirational

in this day and age, especially in a rural area such as ours, and forcing people to do otherwise will drive people and business away from the City.

9. There is no mention of the fact that Allesley Parish is currently consulting on a boundary review which would see the parish area, containing most of the city's remaining green belt, leaving the jurisdiction of Coventry to become a parish within Warwickshire. This should be taken into consideration when drawing up the new local plan.

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

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

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

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

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

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

Paragraph

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

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

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

☐

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

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

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

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

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

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