

# 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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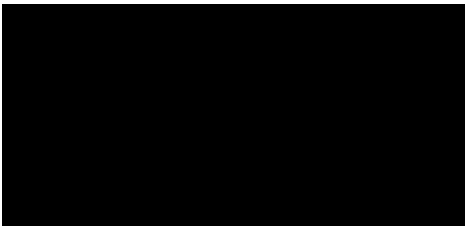
## Part A

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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="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Richard"/>	<input type="text"/>
Last Name	<input type="text" value="Foxon"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text" value="Managing Director"/>
(where relevant)		
Organisation	<input type="text"/>	<input type="text" value="Newton LDP"/>
(where relevant)		
Address Line 1	<input type="text"/>	<input type="text" value="Stockton House"/>
Line 2	<input type="text"/>	<input type="text" value="Rugby Road"/>
Line 3	<input type="text"/>	<input type="text" value="Stockton"/>
Line 4	<input type="text"/>	<input type="text" value="Southam"/>
Post Code	<input type="text"/>	<input type="text" value="CV47 8LB"/>
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: Newton LDP Ltd

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 type="text"/>	No	<input type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="X"/>

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.

Policy DS1: Overall Development Needs – Plan Period

This policy is not positively prepared, justified or consistent with the NPPF. It is therefore not Sound.

Policy DS1 defines the Plan period as 2021 – 2041 which commences at least five years prior to the earliest date at which it is anticipated that the Local Plan will be adopted, albeit it should be noted that these timescales often slip. This is not justified nor is there anything within National policy which supports this approach.

Accordingly, reference to the past 5 years means that the plan does not make sufficient provision to meet the Council's future housing requirement and manipulates the figures to avoid the release of land from the Green Belt.

Furthermore, the NPPF at Paragraph 22 states that Local Plans should look ahead over a minimum 15 year period from adoption. There is no flexibility built into the existing draft to cater for any delay associated with adoption of the Local Plan.

The policy also fails to state that the Council will review the Local Plan within 5 years of adoption and therefore is not consistent with Paragraph 33 of the NPPF 2023. The policy should be amended so that it is in line with the NPPF.

(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.

1. Alter the Plan period so that it commences from the date of adoption, with sufficient time to allow for slippage.
2. Remove the previous 5 years' housing completions from current calculations for housing requirement/supply.
3. Review the Local Plan within 5 years of adoption, in line with the NPPF.

(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:

Provide advice regarding issues raised above.

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

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