

# 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

Mr

First Name

Richard

Last Name

Foxon

Job Title

Managing Director

(where relevant)

Organisation

Newton LDP

(where relevant)

Address Line 1

Stockton House

Line 2

Rugby Road

Line 3

Stockton

Line 4

Southam

Post Code

CV47 8LB

Telephone Number

E-mail Address

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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"/>

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 H1 – Housing Land Requirements**

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

The policy identifies a housing requirement of 29,100 over the plan period, which is 1,455 per annum. During the period from 2021 – 2024, (prior to the plan being adopted) there were 7,351 completions, which is 2,450 per year. This figure is 2,986 completions in excess of the identified need for this period.

The inclusion of this supply prior to the Local Plan being adopted means that the housing land requirement for the fifteen-year period from 2026 – 2041 is understated and not sound. This is at odds with the NPPF and does not satisfy the Governments objective to significantly boost the supply of homes.

Affordability issues in Coventry are such that the HEDNA calculates an affordable need of approximately 2,000 affordable dwellings per annum in Coventry. Addressing this overwhelming social issue, will require a significant uplift on the

HEDNA's calculation of 1,964 dwellings per annum, even prior to the Council's removal of the 35% 'urban uplift'.

Notwithstanding the fact that the HEDNA uses outdated economic growth forecasts from Cambridge Econometrics dating back to 2021, it still identifies 551 hectares of logistics floorspace being required across the housing market area to 2041. The location of this land has not yet been confirmed and as such the job creation has not been factored into the HEDNA housing requirement.

We are aware of more up to date evidence which suggests that there is demand for over 150 hectares of Industrial & Logistics space within Coventry over a 25 year period, generating an Unmet Need of approximately 85 hectares. This job growth must be considered and factored into the housing need for Coventry, else the Local Plan housing requirement will be flawed.

(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. The previous 7,351 completions should be removed from the supply figure.
2. The housing requirement does not satisfy the Government's objective to significantly boost the supply of homes.
3. The Local Plan must allocate sufficient sites to help address the identified affordable housing need as referred to in the HEDNA.
4. Factor in realistic economic growth forecasts and associated job creation into the housing requirement.

(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.