

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, 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/planningpolicyprivacynote

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.

Part A

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		

Part B – Please use a separate sheet for each representation

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

Policy H2 – Housing Allocations

There is concern that the allocated housing numbers have been deliberately inflated to justify avoiding the release of green belt land. This approach undermines transparency and proper strategic planning. The necessity of meeting housing targets should not come at the expense of realistic development planning, and the plan should ensure that figures are evidence-based rather than manipulated to fit policy constraints.

Land at Spon End is identified as an allocation of 750 dwellings, however there are currently residential dwellings on site that would need to be demolished in order for this proposed development to come forward. Accordingly, the net increase in dwellings would be much lower than the 750 new dwellings that is assumed towards the housing allocation.

The site at Hawkes Mill Lane is both achievable and deliverable. The site has two points of access and highways work has been undertaken. The landowners are currently in the final stages of bringing a promotion partner on board, who will shortly be preparing a planning application for the site.

The site is located partially on brownfield land and land that was found to only contribute moderately to the purpose of the Green Belt, when assessed in the June 2015 Joint Green Belt Study, achieving a score of 11/20. When assessed as a standalone site, there is little or no contribution to the Green Belt.

The site should be allocated for housing to cater for shortfalls elsewhere within the city which will inevitably occur from a flawed plan, focussed on complex brownfield regeneration schemes and which under provides for housing, including affordable housing. The site is available, suitable and deliverable.

(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. A more in depth assessment as to realistic housing numbers that can be achieved on draft allocated sites, including a calculation of net new dwellings.

(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)

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 in respect of the Soundness issues raised.

(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.