

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/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.

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

Mr

First Name

Sam

Paul

Last Name

Rogers

Hill

Job Title

Senior Planning Manager

Senior Planning Director

(where relevant)

Organisation

St Modwen Homes

RPS

(where relevant)

Address Line 1

1 Newhall St

Line 2

Birmingham

Line 3

Line 4

Post Code

B33NH

Telephone Number

E-mail Address

Part B – Please use a separate sheet for each representation

Name or Organisation:

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 DS2: The Duty to Co-operate and partnership working

RPS welcomes the Councils' stated commitment (in criteria 1) to working across the housing market area to support the delivery of the development needs that originate from the City.

Housing need matters

Nonetheless, as we have explained in our response to Policy DS1, the housing requirement is over 10,000 more than suggested under the December 2023 standard method (when applied correctly), resulting in a notional shortfall of 7,787 number of dwellings emanating from the City. This unmet need must be re-distributed to neighbouring areas, primarily to neighbouring authorities within the Coventry & Warwickshire Housing Market Area. In doing so, this will ensure CCC accords with national policy on joint working to determine whether development needs that cannot be met wholly within a particular plan area, in this case in Coventry, could be met elsewhere (NPPF 2023, para 26).

However, it is very clear that CCC has no intention to work ‘actively, constructively, and on an ongoing basis’ or work jointly with its neighbours (in accordance with Duty under the Localism Act) in respect to addressing future housing need in the City. This is largely due to the artificial suppression of the stated housing requirement in Policy DS1 (and Policy H1), which includes the unjustified exclusion of the urban centres uplift applicable to Coventry under the December 2023 standard method set out in Planning Practice Guidance (PPG). This has resulted in a lower housing requirement and, consequently, wiping out any apparent unmet need for housing coming from the City (a completely different scenario to the current, adopted strategy).

Taken together, the approach to defining the housing requirement does not constitute an effective and justified strategy and so is not soundly-based. Furthermore, due to a unilateral decision to suppress the housing figure, this also arguably does not comply with the Duty to Cooperate obligations that requires constructive engagement to address strategic matters under the Localism Act.

Meeting the affordable housing needs of the City

Furthermore, criteria 2 of the policy states that:

“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”

RPS acknowledges the approach to addressing the need for affordable housing emanating from the City, including working with neighbouring authorities to help deliver this outside the City.

However, meeting affordable need should not be considered as separate to addressing the wider housing needs of Coventry, which includes market housing. This is because the vast majority of new affordable homes delivered as part of mixed-tenure housing schemes involve joint partnerships between private house builders and registered providers, irrespective of location. It is unclear how this policy will be delivered without the market-led schemes coming forward and, as currently drafted, the policy is not effective and so not soundly-based.

(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.

Work with its neighbours to identify a suitable mechanism for re-distributing the unmet need from the City under the December 2023 standard method (7,787 dwellings) ideally through a revised Memorandum of Understanding (MOU) signed between the C&W HMA authorities.

Amend criteria 2 as follows (additional text):

"In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities and housing providers (private and public) 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, including mixed-tenure housing development."

(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:

To represent the views of St Modwen and respond to issues raised at the hearing sessions.

(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.